

Processing rules, division of tasks and quality assurance of the automated decision-making procedure for National Certificates of Language Proficiency

National Certificates of Language Proficiency

National Certificates of Language Proficiency (YKI) tests are language tests for adults. The tests measure functional language proficiency in everyday situations. The YKI certificate awarded for completing a YKI test can be used as proof of language skills in different languages.

The assessment criteria for the YKI tests are based on the Common European Framework of Reference for Languages. The system is audited by international assessment organisations.

The authority responsible for the YKI system is the Finnish National Agency for Education. It is responsible for the maintenance and development of the system, as well as for YKI regulations and the awarding of YKI certificates. The Finnish National Agency for Education has contracted out the practical implementation of the YKI tests to the Centre for Applied Language Studies (CALS) at the University of Jyväskylä. YKI tests are organised all over Finland.

YKI tests are objective from an equality perspective, and the process is neutral. This is ensured through the careful preparation of the tasks included in the tests. Normal adherence to the principles of good governance ensures that the system is non-discriminatory.

Processing process and division of tasks

Test-takers register for the YKI tests by filling in an online form on the registration page of the YKI system. The registration instructions and a link to the registration form are available on the Finnish National Agency for Education's website. The registration system is maintained by the Finnish National Agency for Education, which is responsible for the registration process. When a test-taker registers for a YKI test, the Finnish National Agency for Education provides them with information about the digital YKI certificate and the procedures for issuing it. This information includes an explanation of the criteria for issuing the digital certificate in the My Studyinfo service and of the notification messages related to the issuing of the certificate (electronic Suomi.fi Messages). A description of how the test-taker is informed of the certificate is provided on the registration form and on the website of the Finnish National Agency for Education.

When a test-taker registers for a YKI test, information about them is recorded in the learner number register maintained by the Finnish National Agency for Education. The grounds for and purposes of this personal data processing are described in the privacy statement of the learner number register. Persons added to the learner number register must be identified so that they can be assigned a unique identity and data related to their identities can be processed reliably in services and data resources. This identification process is carried out automatically if the test-taker has a Finnish personal identity code and their name matches the data recorded in the Population Information System. This can be done upon registration if the test-taker uses strong identification (Suomi.fi e-identification). The identification is also possible when the test-taker logs in to the YKI system with their email and provides their Finnish personal identity code and all other information necessary for the identification process on the registration form. If the test-taker does not have a Finnish personal identity code, they cannot be identified in the learning number register based on data recorded in the Population Information System.

Test-takers take the YKI test at a test centre of their choice. The appropriateness of the test centre and the individual test event are the responsibility of the test recipient, who acts on behalf of

the Finnish National Agency for Education on the basis of a contract. The Finnish National Agency for Education provides the necessary instructions to the organisations that receive and organise the tests to ensure that the test conditions are uniform and that the test is conducted appropriately, regardless of the test centre. The test centres receive the test questions and tasks from and submit the completed tests to CALS for assessment.

Completed YKI tests are assessed and graded by assessors who are registered in the register of assessors for National Certificates of Language Proficiency. The work of the assessors is guided and supervised by CALS. Due to the nature of the matter (language test), the process does not, as a general rule, include an examination by an authority and a hearing of the views of the parties as provided for in the Administrative Procedure Act. After receiving their YKI certificate, the test-taker may request information on how the assessment criteria were applied to their test. In practice, the grounds for these decisions are not stated because the test-taker receives a certificate attesting to the level of language proficiency that they achieved in the test. The test-taker will not be disqualified even if they do not reach the proficiency level that they registered for.

The results of YKI tests are stored in a processing system maintained by CALS, the YKI database. CALS's part of the processing ends with the recording of the test results in this processing system. From then on, the party responsible for the process is the Finnish National Agency for Education.

From CALS's processing system, the data is transferred to the filing system for National Certificates of Language Proficiency maintained by the Finnish National Agency for Education. From the filing system for National Certificates of Language Proficiency, the data is transferred to the study and degree information service (KOSKI service) maintained by the Finnish National Agency for Education, which aggregates the test-taker's information and provides them with centralised access to it via the My Studyinfo service.

The KOSKI service generates the test-taker's YKI certificate (PDF) based on defined processing rules. The Finnish National Agency for Education adds an electronic seal to the file to verify its authenticity and integrity. After the certificate has been generated for the first time in the service, the test-taker can log in to the My Studyinfo service to download and view the certificate at any time.

Once the digital YKI certificate is generated and ready to download, the KOSKI service sends a request to the Studyinfo Tiedotuspalvelu service maintained by the Finnish National Agency for Education to send a notification message to the test-taker.

The notification messages are sent primarily as electronic Suomi.fi Messages, provided that the test-taker is using the Suomi.fi Messages service. In order to use the Suomi.fi Messages service, the test-taker must have both a Finnish personal identity code and an identification token, such as online banking credentials, that allows them to log in to e-services. Similarly, in order to use the My Studyinfo service, the test-taker must also have an identification token that allows them to log in to e-services (Suomi.fi e-Identification), so in order to use the My Studyinfo service, the test-taker needs online banking credentials, a mobile certificate or an ID card with a chip.

The Tiedotuspalvelu service checks whether the test-taker is using the Suomi.fi Messages service from the Suomi.fi Messages service of the Digital and Population Data Services Agency (so-called mailbox status check). The electronic mailbox to be checked is identified by the test-taker's personal identity code. In response, the Suomi.fi Messages system returns the entered personal identity code to the Tiedotuspalvelu service if the associated mailbox is in use. If the

electronic mailbox is in use, the test-taker will receive the messages sent to them electronically. If the mailbox is not in use, the personal identity code is not returned, which indicates to the Finnish National Agency for Education that the test-taker can only receive messages by post. In these situations, the Finnish National Agency for Education issues the notification concerning certificates according to the physical notification process.

If the test-taker has activated the Suomi.fi Messages service, they receive a Suomi.fi message informing them of a new matter in the My Studyinfo service. The sender information of the Suomi.fi message indicates that the sender is the Finnish National Agency for Education, My Studyinfo service. The Suomi.fi message does not contain the certificate file. Instead, the content of the message directs the test-taker to view the notified matter in the My Studyinfo service.

After logging in to the My Studyinfo service, the test-taker can view the received message in the My Messages inbox of the service. The content of the message informs the test-taker that their new YKI certificate is ready. The message also contains instructions on how to download the certificate from the My studies section of the My Studyinfo service, which displays the information on completed studies and degrees available in the KOSKI service and where digital certificates can be downloaded. In addition to this, the message includes instructions on how to request an administrative review.

If it is not possible to send an electronic notification message to the test-taker, their YKI certificate and the instructions on how to request an administrative review are sent by post. Even in these situations, the certificate file is still generated in KOSKI, but the test-taker receives both the certificate file and the instructions on how to request an administrative review by post. The printed certificate does not have an electronic seal, as it is replaced by a unique OID generated in the KOSKI service. The OID always follows the format 1.2.246.562.15.XXXXXXXXXXX, with the ending being unique for each certificate.

It is not possible to send an electronic notification message to the test-taker if they have never activated the Suomi.fi Messages service or if they have closed their Suomi.fi Messages account at the time when the message is to be sent. However, if the test-taker logged in using strong identification when registering for the YKI test, or logged in using their email and provided their Finnish personal identity code and all the information requested on the registration form that is necessary for identification in the learner number register, they can still download the digital YKI certificate from the My Studyinfo service or view it at any time after the certificate has been generated for the first time.

The possibility of sending an electronic notification message cannot be checked and an electronic message cannot be sent if the Finnish National Agency for Education does not know the test-taker's Finnish personal identity code. A test-taker who has not been uniquely identified on the basis of the Population Information System at an earlier stage of the process is also unable to view their own information by logging in to the My Studyinfo service. In these situations, the test-taker can only receive their YKI certificate by post along with the instructions on how to request an administrative review, but cannot receive a digital version of the certificate on the My Studyinfo service.

If the test-taker does not have the option to operate digitally, they can operate according to the physical alternative, which is available if necessary.

Quality assurance

The quality assurance of the YKI test system is described in detail in the publication *Yleiset kielitutkinnot 30 vuotta* (Finnish National Agency for Education's Reports and Surveys 8/2024), which is available on the Finnish National Agency for Education's website (only in Finnish).

Quality assurance is aimed at ensuring that the language test is objective and neutral from an equality perspective. Normal adherence to the principles of good governance ensures that the system is non-discriminatory in other respects.

Quality assurance of the certificate process is aimed at ensuring legality, good governance and data protection. The quality expectations of the process are focused on the people working on the implementation of the YKI system, the information systems used and the general characteristics of the process, such as accuracy and ease of use.

High-quality employee performance is ensured through careful recruitment, good onboarding and guidance, competence development and continuous monitoring.

The test system or other information systems used in the process are subject to continuous monitoring, evaluation and improvement. The systems are subject to the usual data protection and security assessments and descriptions. Quality is also ensured by the integration of the YKI system into the national Studyinfo system. This integration will continue to deepen as the digitalisation of the test system and YKI process progresses.

The overall functionality of the process is ensured through appropriate process descriptions, work instructions and employee training.

The public official responsible for quality assurance is the head of the unit responsible for National Certificates of Language Proficiency at the Finnish National Agency for Education.

Request for an administrative review and updating of the certificate

If completion data previously submitted to the KOSKI service is updated so that the assessment data changes, the YKI certificate is also updated automatically. This is the case if a test-taker's grade changes as a result of a reassessment, for example. If a test-taker requests an administrative review of their test assessment and one of the grades on their certificate changes following the review (reassessment), the digital certificate is automatically updated in My Studyinfo. The changed grade or grades are transferred from the filing system for National Certificates of Language Proficiency to the KOSKI service once the reassessment process has been completed and a decision has been made by the Certificate Committee. The test-taker can then download the updated YKI certificate from the service in the same way as they could download the previous copy they received before the administrative review. The new certificate replaces the previous one.

The test-taker is informed of the decision of the Certificate Committee through the case management system of the Finnish National Agency for Education. The updated certificate can also be sent to the test-taker by post through the physical process if they do not have access to the My Studyinfo service.

Validation of the authenticity and integrity of the certificate

A test-taker logged in to My Studyinfo can download and save the PDF certificate file to their own devices or share it with third parties of their choice, such as an employer or another authority.

Any holder of the document can check the electronic seal added to the PDF file by the Finnish National Agency for Education using the validation service for electronically sealed documents operated by the Digital and Population Data Services Agency. The service allows you to validate an electronically signed or electronically sealed document. The service checks how many signatures a document contains, whether they are in valid format and whether the issuer of their seal is trusted. The documents submitted to the service for validation are not saved, as they are destroyed after the validation.

The electronic seal is not transferred from the digital file to a printed version. If a test-taker needs an additional paper printout of their YKI certificate with a physical OID to confirm authenticity, they can order a paper copy from the Finnish National Agency for Education according to separate instructions. The instructions are available on the website of the Finnish National Agency for Education.

In the version of the YKI certificate sent by post by the Finnish National Agency for Education, the electronic seal is replaced by the certificate's unique OID. Any holder of the document can validate the OID added to the printed document by the Finnish National Agency for Education with the Finnish National Agency for Education according to separate instructions. The instructions are available on the website of the Finnish National Agency for Education.