

**Submission to the Inquiry by the Productivity Commission
into the Migrant Intake into Australia**

Submission prepared by

**Dr David E. Ingram, AM,
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June, 2015**

EXECUTIVE SUMMARY

Scope of the Submission: The submission is limited in scope to the issue of English language proficiency testing and its impact on migrants and Australian industry and economy.

Author: The author of the submission is Dr David Ingram, AM, an applied linguist whose specialisations include language policy and language testing. He was a member of the team that developed IELTS and was Chief Examiner (Australia) for ten years. Earlier he had initiated and co-developed the International Second Language Proficiency Ratings (ISLPR®).

Effects of the Current Arrangements: The principal test used for visa purposes at all levels is IELTS. While IELTS is a highly regarded test, it was developed specifically to test the English of international students wishing to enter English-speaking universities or other training programmes. Its content and design do not meet the needs of tests to assess proficiency for vocational purposes or for general survival purposes.

The inappropriateness of IELTS for migration purposes imposes a punitive load on visa applicants, many of whom take the test many times without success. Yet many who have been tested on a test that better reflects their language background and needs have shown that they have high proficiency at a level that would enable them to perform satisfactorily in their chosen vocation. Harmful results from this include:

1. The test results do not accurately reflect the candidates' practical proficiency or the proficiency needed for employment in their vocation.
2. The cost to the candidates of taking and re-taking IELTS is punitive especially since they are either unemployed or working at a low level because they have not been able to achieve the IELTS scores needed for visas or registration and employment in their vocation.
3. Many migrants who have skills needed in Australia are forced to leave the country resulting in a considerable loss to Australia of skills and otherwise productive workers.

The submission does not recommend that IELTS be dropped but that the International Second Language Proficiency Ratings (ISLPR®) also be available as an option for temporary or permanent migrants.

The ISLPR®: ISLPR® refers to both a test and a scale that provides a very detailed description of how a second or foreign language develops from zero to native-like proficiency. The test aims to elicit candidates' maximum language behaviour which is matched against the scale descriptions.

ISLPR is an adaptive test in which the test content can readily be adapted to match the needs of the candidate and the purposes of the test. An ISLPR® test, properly administered, always matches the individual candidate's needs and is readily

designed to measure both general proficiency and proficiency in English in whatever academic or vocational field is relevant to the individual candidate.

Acceptance of the ISLPR®: The ISLPR® was initially released in 1979 and has been in widespread use around Australia ever since. It is increasingly used internationally and is accepted by institutions in many countries. It is already accepted for migration purposes as a test of Functional English.

Validity and Reliability: ISLPR® has been demonstrated many times to provide valid and reliable test results when administered by properly trained testers. Like all major tests, in practice, the validity and reliability of the ISLPR® rely on the quality of the training of the testers and the quality assurance procedures that are in place.

ISLPR International Accreditation Authority (IIAA): The ISLPR International Accreditation authority (IIAA) has been established to oversight all matters related to the quality assurance of ISLPR® tests, including the training and accreditation of testers, the accreditation of testing centres and the moderation and accreditation of test results. IIAA also issues all accredited results. As applies to all “high stakes” tests and their owners, only results that have been accredited and issued by IIAA should be accepted.

Uses of the ISLPR®: The ISLPR® is already used for a variety of purposes wherever a test is required of general or specific purpose proficiency, including (but not exclusively) for in-house purposes in English centres, for Functional English for migration purposes, for entry by international students to universities, TAFE and other educational institutions, for teacher registration by overseas trained teachers, to demonstrate the English proficiency of taxi drivers, and in tests for legal purposes.

Test Preparation and Feedback: Some test preparation courses (e.g. some IELTS Preparation courses) focus more on test-taking techniques than on developing real proficiency. The best preparation for an ISLPR® test is a good communicative language course supported by individual needs-based tutorials. An accredited ISLPR® testing centre can provide individual tutorials and also test feedback to alert candidates who are unsuccessful in their test to what they need to do to improve their proficiency.

Recommendations:

1. That IELTS continue to be accepted as an approved test but that the *International Second Language Proficiency Ratings (ISLPR®)* be also accepted, thus giving candidates who feel that they are discriminated against by the irrelevant content of IELTS tests access to an alternative test more appropriate to their needs. It is recommended that the accepted test be shown thus: ISLPR® (IIAA accredited) or, if the full name is to be used, *International Second Language Proficiency Ratings (ISLPR®, IIAA accredited)*.
2. That centres administering the ISLPR® be required to undertake an appropriate quality assurance process through the ISLPR International Accreditation Authority (IIAA) and that only IIAA-accredited test results be

accepted. This expectation is no different from the quality assurance requirements built into and enforced by such tests as IELTS or TOEFL.

3. It is recommended that, rather than a blanket proficiency level being specified for vocational or competent levels, specific ISLPR proficiency profiles be established for, at least, the priority vocations. Such needs-analyses and the resultant proficiency profiles should identify the actual language needs of a vocation ensuring that the level required is not unreasonable (i.e. unnecessarily high or unreasonably low) and that persons who attain the results are both able to survive in the Australian community and able to work successfully in their chosen industry without English proficiency inhibiting their performance.

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SCOPE OF THE SUBMISSION

This submission is limited in scope to the issue of English language proficiency testing and its impact on permanent or temporary migrants and Australian industry and the economy. It does not address the desirability or otherwise of testing migrants' English skills though, granted the importance of English in Australian society, the present writer would agree that it is reasonable to try to ensure that all Australian citizens and residents have at least some level of English; however, if migrants' English proficiency is to be tested as a condition of their eligibility to live and work in Australia, it is essential that the test be fair, reliable, valid for the specific purposes, and relevant to each candidate.

In particular, the submission draws attention to the serious problems both for individual migrants and Australian industry and social development that arise from the present policies on English language testing, including the heavy reliance that is placed on the IELTS Test. Though the submission does not argue for IELTS not to be used, it draws attention to the desirability of having a test available that can better cater for the diverse backgrounds and needs of migrants. Specifically, the submission recommends that the International Second Language Proficiency Ratings (ISLPR[®]) be accepted as a suitable test, optionally available, for all tests for migration purposes since (1) it is an adaptive test whose content can readily be made relevant to the needs of each candidate and (2) the test, testers and test results are now subject to strict quality assurance through the ISLPR International Accreditation Authority (IIAA). Thus, the submission also argues for the acceptance of accredited ISLPR[®] test results.

THE AUTHOR OF THIS SUBMISSION

The author of this submission is Dr David Ingram AM, an applied linguist whose specialisations include language policy and language testing.

In brief, it might be noted that David Ingram is a widely published academic with vast experience in applied linguistics, especially in language policy and language testing.

He was one of the original developers of IELTS and was IELTS Chief Examiner (Australia) for the initial ten years after the test's release. He is also the initiator and co-author of the ISLPR. After working in education for over 50 years, he retired from his position as Professor of Applied Linguistics and Director of the Centre for Applied Linguistics and Languages at Griffith University and, subsequently, as Executive Dean in Melbourne University Private and Professorial Fellow in the University of Melbourne and, in 2007, started a private language testing business, ISLPR Language Services Pty Ltd (ILS) now at 9 Gowrie Street, Mt Gravatt in Brisbane.

EFFECTS OF CURRENT ARRANGEMENTS

At present, for visa purposes, the commonest test in use for temporary and permanent migrants at all proficiency levels and for whatever purpose their English is being tested is IELTS though, at the Functional English level, the *International Second Language Proficiency Ratings* (ISLPR[®]) is also approved. IELTS is the largest test in the world and is available in most countries, administered and quality assured under the supervision of its owners, the British Council and IELTS Australia and managed by the University of Cambridge Local Examinations Syndicate (UCLES). IELTS was carefully designed and developed in 1987-88 by a joint British and Australian team, in which the present writer, Dr David Ingram, was the Australian representative and Dr Carolyn Clapham and Dr Charles Alderson, the British representatives. Dr Ingram became IELTS Chief Examiner (Australia) and IELTS Consultant Examiner in Chief for 10 years from the test's release to 1998 and subsequently was on the Board of Directors of IELTS Australia for approximately 4 years.

IELTS was specifically designed to assess the English proficiency of international students seeking enrolment in English speaking universities and training programmes, especially in Australia and Britain, though its use now extends to many other countries. It is important to note that it was developed specifically for that purpose even though it has come to be used for many other purposes since its release. Important ethical questions are raised by the use of a test for purposes for which it was not specifically designed.

In fact, this problem of the relevance of IELTS to candidates was aggravated by decisions made immediately prior to its release and several years later. Specifically, when IELTS was first developed and released, there were two modules: an academic module and a general training module. In the academic modules in reading and writing, there were initially five modules, which were reduced prior to release to three broad academic areas covering the health sciences, the physical sciences and the humanities. These multiple modules were intended to ensure that the test was relevant to candidates in those three broad areas but, several years after the test's release, these three academic modules were reduced to one. As a result, many candidates find that they are confronted with reading texts and writing tasks that are unrelated to their background or language experience and unrelated to the field they are going to study or work in.

The fact that IELTS was developed specifically for academic or training purposes and that there is now just one "academic" version means that IELTS does not meet

the need to be able to assess proficiency for vocational purposes or for general everyday survival purposes. It also means that the content of IELTS will not be appropriate to the backgrounds, knowledge or future needs of most applicants taking the test for visa purposes, especially at vocational or competent levels. It can, therefore, be argued that the requirement to be tested using IELTS amounts to unreasonable discrimination, pre-determining migrant candidates to failure and, in many cases, the loss of significant skills to Australia, including skills on the basis of which many of the applicants originally came to this country.

It might also be noted that ISLPR[®] is an Australian test, administered in Australia by Australians using the Australian variety of English. At a high proficiency level (above ISLPR 3 or IELTS 6), this is not a major issue since, at levels above ISLPR 3 candidates must be able to cope with different varieties. However, it is a much more serious issue for migrants whose proficiencies are below ISLPR 3, as is generally the case for candidates taking tests for Functional English, 457 visas or vocational tests. Because IELTS draws on British, Australian and other varieties, this is an especially serious issue for migrants who have experienced Australian English in contexts where Broad or General Australian English is most experienced as is probable, for example, for the foreign workers referred to in the beekeeping case study in Appendix One.

The discrimination that results from the use of an inappropriate test with no satisfactory alternative offered also imposes a punitive financial load on many applicants, many of whom take IELTS not just once but many times over at great cost and with little hope of achieving the results required because the test content is irrelevant to them and to their needs. The present writer in his day-to-day tutoring and testing activities has encountered many candidates who have taken IELTS anywhere from ten to fifty times. This imposes great cost on people who, in the many cases encountered, have been unable to get employment in their chosen profession because they could not meet the IELTS requirements and yet they are either unemployed or employed at a low level with commensurately low income; yet when they were tested on the ISLPR[®] with test content relevant to their vocational needs and everyday survival, their proficiency was more than adequate, often close to native-like.

It is clear from this discussion, supported by the case studies in Appendix One, that, as good a test as IELTS undoubtedly is when it is used for the purposes for which it was designed, the over-reliance on IELTS for migration purposes has a number of very deleterious consequences:

1. Many candidates' results are simply not an accurate representation of their actual practical proficiency, in some cases those results being inferior to their real ability and, in other cases, being too high (see the case studies in Appendix One).
2. Some candidates who achieve what is required, in practice may be quite unable to cope with the language demands of their vocation or, in the case of students, with their course whereas a test better focussed on their real needs in the language area of their needs would have identified any problems.

3. Other candidates who are able to cope with the work requirements of their vocation are excluded, they might take and re-take the test until they happen to receive texts and tasks more relevant to their previous language experience but many will be forced to leave Australia with their real vocational skills being lost to this country.
4. In brief, many migrants or foreign workers on temporary visas who are able to survive adequately in the Australian community and contribute appropriately to their vocation here are excluded. In some cases, they will spend hundreds if not thousands of dollars taking and re-taking the test. In other cases, if for other reasons they are permitted to remain in Australia, they might remain unreasonably on the unemployed list or work in positions considerably inferior to their qualifications, interests and abilities. In yet other cases (probably the majority), they will be forced to return to their countries of origin with the needed skills that formed the basis of their original acceptance as migrants being wastefully denied to Australia.

The harmful effects from over-reliance on IELTS or any other test that was developed for purposes very different from the purposes of an Australian migration programme are most clearly seen in the case studies in Appendix One.

In brief, in practice, the use of IELTS for purposes for which it was not designed also means that many candidates seeking vocational registration or to demonstrate their proficiency at the vocational or competent levels for visa purposes are confronted with tests that are not relevant either to their language experience or to their current or future needs whether in everyday living or in employment. In addition, however, the use of foreign tests or tests that refund some or all of their profits overseas has a further impact on the Australian economy in that substantial funds are lost to Australia whereas ISLPR[®], no matter who administers it, accredited or not, is an Australian test whose profits remain in this country.

Nevertheless, it is **not** the purpose of this submission to argue that the use of IELTS should be discontinued. It is a high quality test, available in most countries and it has proven its practical usefulness over some 25 years. However, it is also desirable that another test, better suited to the many purposes for which visa applicants need to use English and better able to assess their English proficiency at the various levels required for visa purposes, should be optionally available.

This submission proposes that the *International Second Language Proficiency Ratings* (ISLPR[®]) be accepted as an additional test available to be taken for visa purposes.

The ISLPR[®]

What it is: The term, ISLPR[®], is used to refer to two things: a test procedure and, fundamentally, a scale that provides a detailed description of a person's language behaviour in a second or foreign language as it develops from zero to native-like proficiency in each of speaking, listening, reading and writing. The ISLPR[®] test is designed to elicit a candidate's language behaviour, enabling it to be matched

against the scale. It is an essentially practical test focussing directly on the candidate's practical language ability and not just on the candidate's formal knowledge or his or her ability to tick boxes or write in a word or two. In other words, it is a "direct proficiency test".

The ISLPR[®] scale provides a detailed description of language behaviour at 9 of its 12 levels, the other three levels being intermediate points [see Ingram, D. E. and Elaine Wylie. 1978/2012. *International Second Language Proficiency Ratings – General Proficiency Version for English*. Mt Gravatt, Queensland: ISLPR Language Services Pty Ltd]. Each "macroskill" of speaking, listening, reading and writing is described in detail. The descriptor for each macroskill at each level consists of a general description of language behaviour together with a second column that provides examples of the language behaviour and language tasks that occur at that level, and a "Comment" column that defines terms and explains issues in the other two columns. A summary of the scale is provided in Appendix Two though, in that summary, the four macroskills are shown together in a single abbreviated summary sentence.

The slightly strange numbering system of the levels is of historical origin but its justification lies in the fact that it prevents the four macroskills being added together and averaged, as is done in IELTS, to obtain an "Overall Bandscore". Since proficiency levels commonly differ between the four macroskills, the notion of an "overall bandscore" is inherently erroneous and clouds the real differences that may occur between macroskills. Hence, the outcome of an ISLPR test is a profile showing the candidate's proficiencies in each of the four macroskills, e.g. S:3+, L:4, R:3, W:2+.

Purpose: The ISLPR[®] was developed specifically to focus on a candidate's practical language ability. It is an individual test administered in a one-on-one, face-to-face interview for speaking, listening, and reading plus a writing test which can be administered individually or *en masse*. As already noted, its aim is to elicit a candidate's practical language behaviour and match it against the detailed scale description in each of speaking, listening, reading and writing. In appropriate circumstances with reliable local administrative support, the ISLPR can also be administered on-line using communication software such as Skype or Windows Live.

The ISLPR[®] is an adaptive test in which the test content is routinely adjusted to match the language experience and, most importantly, future needs of the individual candidate. Thus, it is readily adapted to match, for instance, the particular vocational or academic area of the individual candidate and his or her previous language experience. It can be adjusted, also, to fit whatever the proficiency level of the candidate or the visa requirements might be. This means that an ISLPR[®] test, properly administered, always matches the individual candidate's needs and is readily adapted to measure both general proficiency and proficiency in English in whatever academic or vocational field might be relevant to the individual candidate or to the purposes of the test. In other words, an ISLPR[®] test, properly administered, will more closely match the purposes of the visa testing than a "one size fits all" test such as IELTS.

Acceptance of the ISLPR®: The ISLPR® was initially released in 1979 and has been in widespread use both around Australia and, increasingly, internationally since then. It has been continually subjected to review, on-going development and trialling. In Australia, it is accepted for international student entry purposes in many universities, most TAFEs, and other educational institutions. Ever since it was first released, the ISLPR® has been accepted many times in courts of law in Australia for such purposes as to testify to the English proficiency of plaintiffs or defendants where their ability to understand English in general or police interrogators in particular was in question. It is accepted by all teacher registration authorities in every State and Territory. It has been accepted by the National Transport Council for the specification of the minimum English proficiency taxi drivers across Australia should have [see ISLPR Language Services. 2010. *Report on the English Language Requirements for Taxi Driver Recruits*. Mimeograph].

Internationally, the ISLPR® has long been used in New Zealand and Kiribati for the proficiency testing of teachers and, in Kiribati, teacher education students and trades students. Most recently, the National Organisation for Educational Testing, the Iranian Government organisation that oversights all educational testing in Iran, has given ISLPR® priority over both TOEFL and, especially, IELTS. In addition, ISLPR® has already been accepted by universities overseas, not least in Britain, Canada and the United States. It is only recently that efforts have been made to promote the test internationally and the response so far has been rapid and highly favourable, not least because its content is more readily adjusted to the needs of the candidates and the institutions. This is, in fact, just continuing a trend that started soon after the release of the first versions of the ISLPR® as witnessed in the contributions it and its approach to testing have made to such testing systems as IELTS and the American scale, the ACTFL Guidelines.

Over the years since its release, the ISLPR® (or, under its former name, the ASLPR) has been used to state English proficiency in legislation and regulations, e.g. that for Functional English for visa purposes. The document “Immigration (Education) Act 1971 – Specification under subsection 3 (2) – Procedures of Standards for Functional English – December 2010 – F2010L03242” states:

I, Chris Bowen, Minister for Immigration and Citizenship, acting under subsection 3(2) of the “Immigration (Education) Act 1971 (‘the Act’) SPECIFY, for the purposes of the definition of Functional English in subsection 3(1) of the Act that Functional English is basic social proficiency in English assessed at International Standard (sic) Language proficiency Rating¹ (sic) 2 across all four macro skills (reading, writing, listening and speaking)

This instrument, IMMI 10/057, commences on 1 January 2011.

Validity and Reliability: The high validity and reliability of the ISLPR when administered by trained interviewers and raters has been demonstrated many times. The earliest formal study was published in Ingram, D. E. 1984. *Studies in Adult*

¹ Despite the errors in the name of the scale, this clearly intends the *International Second Language Proficiency Ratings*. It is noteworthy that both the level name, Basic Social Proficiency, and the level number, 2, are as in the ISLPR®.

Migrant Education: Report on the Formal Trialling of the Australian² Second Language Proficiency Ratings (ASLPR). Canberra: Australian Government Publishing Service. See also Lee, Tony. 1993. "A Many-Faceted Rasch Analysis of ASLPR ratings". Nathan: Centre for Applied Linguistics and Languages, Griffith University. Mimeograph.

In practice, the validity and reliability of the ISLPR rely on the quality of the training given to testers and the quality assurance procedures that are in place. To ensure that the highest levels of quality control are available for the ISLPR[®], the ISLPR Accreditation Authority (IAA) has been established and, in future, only test results that have been accredited by the IAA should be accepted.

Quality Assurance in the ISLPR[®]: In the ISLPR, the maintenance of validity and reliability relies on the proper training of the testers in interviewing, test design and rating and on an on-going quality assurance process. The QA process starts with the thorough training of testers and their progressive accreditation through various stages during which their tests or a decreasing proportion of them are reviewed by senior testers in each centre and, finally, by the ISLPR International Accreditation Authority (IAA), with feedback given on the quality of the interviews, writing tests and test results. Accredited test results are issued by the IAA.

This insistence on quality assurance for testing centres, testers and test results is at least comparable to other major tests with the difference in the case of the ISLPR[®] being that it focuses on real language performance and tester competence and not just on statistical criteria that disguise what happens to individual candidates.

ISLPR International Accreditation Authority (IAA): All reputable tests administered for high stakes purposes and on a large scale are backed by a thorough quality assurance process. In most cases like IELTS, that quality assurance depends on some training of the testers together with a statistical monitoring process which, however, focuses on the overall statistical validity and reliability as administered to thousands of candidates. This fails to identify what might be happening to individual candidates and whether or not their results accurately show their real practical language ability. In addition, a major theoretical and practical difficulty exists in trying to relate essentially numerical scores on a test (e.g. in listening and reading in IELTS) to a candidate's practical ability. The ISLPR[®] overcomes this difficulty by focusing directly on real language behaviour. For more information on this issue, see Ingram, 2003. "Towards More Authenticity in Language Testing". In Cunningham, Denis and Anikó Hatoss (eds.). 2005. *An International Perspective on Language Policies, Practices and Proficiencies*. Melbourne: FIPLV and Editura Fundației Academice AXIS, pp. 313 – 333. ISBN 973 7742 20 6. Also published in various other places including in *Babel*, Vol. 39, No. 2, 2004, pp. 16 – 24, 38 and in *Teacher*, April 2005, pp. 32 – 37 (ISSN 1449-9274).

The ISLPR International Accreditation Authority (IAA) has been established to ensure the highest possible quality control over the ISLPR[®] and ISLPR[®] test results. Unlike other major "high stakes" tests such as IELTS and TOEFL, for a long time

² The ISLPR[®] was originally named the ASLPR but the name was changed in the 1990s in recognition of its widespread use and relevance.

many people and language centres have used the ISLPR[®] with no regard for intellectual property, the trade mark or quality assurance. The IIAA is responsible for tester training and accreditation, accreditation of testing centres that meet the required high standards in their use of the ISLPR[®], accreditation of trained testers who proceed through 4 stages of accreditation, and moderation and accreditation of tests and test results. As with other major tests such as IELTS and TOEFL, only ISLPR[®] test results that have been accredited and issued by the accrediting body, the IIAA, should be accepted since only those results can be relied upon to meet the highest standards. For this reason, it is recommended that the accepted test be identified thus: ISLPR[®] (IIAA accredited) or, if the full name is required, *International Second Language Proficiency Ratings* (ISLPR[®], IIAA accredited).

Uses: As an adaptive test, the ISLPR[®] is used for a variety of purposes for the measure of general proficiency and specific purpose (especially vocational and academic) proficiency. Since its release, it has been successfully used in many thousands of tests every year to test immigrants in AMEP English language programmes and other persons requiring certification of their proficiency for vocational and academic purposes including, for instance, international students, overseas trained teachers seeking Australian registration, taxi drivers, and for other vocations. In ISLPR Language Services, for instance, which is owned and managed by the present writer who also initiated and developed the ISLPR[®], international students are tested for entry to various universities (especially Griffith University), TAFEs, and schools while overseas trained teachers from all States and Territories are tested for teacher registration purposes. Tests are also offered for Functional English for visa purposes in collaboration with the main AMEP centre in Brisbane (TELLS, located in Southbank Institute of Technology). In addition, tests are, or have been, conducted in a number of overseas countries including Kiribati, New Zealand, the Middle East, Japan, Korea and Iran. Vigorous marketing activity has ensured that, as indicated above, many more countries, universities and other authorities accept the ISLPR[®] and accredited testing centres are being established in those countries.

Test Preparation and Feedback: Appropriate test preparation is an important issue for any test: candidates wish and often need to get tuition to assist them to meet the requirements of the test. However, it is also the case that many test preparation courses (especially common IELTS Preparation courses) focus more on test-taking techniques than on real language proficiency development. This has two very negative effects: first, candidates can be coached to cope with the particular types of items that the test uses and so demonstrably gain higher grades without their real, practical English proficiency being significantly improved. Many IELTS Preparation Courses, for example, focus on test taking techniques, often inculcating strategies (such as word-matching in reading) that are actually detrimental to practical language proficiency and its skills. Secondly, the impact of such courses leads to a common experience much reported in the press and anecdotally by international students that, for instance, many international students gain access to their university courses or even graduate with high IELTS scores but without sufficient English to cope with their studies or the workplace. The first case study in Appendix One illustrates the problem. On the other hand, some candidates who do not cope so well with the particular test techniques or texts but who, nevertheless, have high

proficiency fail to gain the scores that one might reasonably expect, in most cases, it seems, because the test content is irrelevant to their previous language experience.

The ISLPR[®], in contrast, focuses on real, practical language ability and the test result reflects that ability rather than mere test-taking techniques. In addition, the best preparation for an ISLPR test is a good communicative language course supported, as in ISLPR Language Services, by individual needs-based tutorials and feedback.

One of the limitations of IELTS and most other tests is also that candidates may fail to gain the result they require but, other than a brief statement of results, they receive no feedback on where their limitations are and what to do about them. This contributes to the phenomenon of candidates' taking multiple IELTS tests without success. On the other hand, the ISLPR[®] as an individual test allows a test centre to provide detailed feedback on a candidate's performance, the state of his or her language development and what he or she needs to do to improve their proficiency.

RECOMMENDATIONS

It is recommended:

1. That IELTS continue to be accepted as an approved test but that the *International Second Language Proficiency Ratings* (ISLPR[®]) be also accepted, thus giving candidates who feel that they are discriminated against by the irrelevant content of the IELTS test access to an alternative test more relevant to their needs. It is recommended that the accepted test be shown thus: ISLPR[®] (IIAA accredited) or, if the full name is to be used, *International Second Language Proficiency Ratings* (ISLPR[®], IIAA accredited).
2. That centres administering the ISLPR[®] be required to undertake an appropriate quality assurance process through the ISLPR International Accreditation Authority (IIAA) and that only IIAA-accredited test results be accepted. This expectation is no different from the quality assurance requirements built into and enforced by such tests as IELTS or TOEFL.
3. It is recommended that, rather than a blanket proficiency level being specified for vocational or competent levels, specific ISLPR proficiency profiles be established for, at least, the priority vocations. This can readily be done through industry needs-analyses as illustrated in the studies referred to in this submission and undertaken for the taxi driver industry for the National Transport Council as well as for the beekeeping industry. Such needs-analyses and the resultant proficiency profiles should identify the actual language needs of a vocation ensuring that the level required is not unreasonable (i.e. unnecessarily high or unreasonably low) and that persons who attain the results are both able to survive in the Australian community and able to work successfully in their chosen industry without English proficiency inhibiting their performance.

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APPENDIX ONE: CASE STUDIES

The following examples of actual candidates or situations have been chosen to exemplify some of the issues that have been discussed. The descriptions and the names have been amended to the extent required to preserve the anonymity of the candidates.

1. An international student from China came to ISLPR Language Services for tutorials and tests. She had recently taken IELTS after taking IELTS Preparation Courses in her home country. She gained IELTS 5 or 5+ in each of the four macroskills. However, she was found to be barely able to communicate at all in spoken English, could understand in a face to face conversation only if the interviewer's speech was kept at the simplest possible level and every utterance was repeated several times, she could not understand even the simplest recordings, and had great difficulty understanding even very simple texts. Her writing was slightly better but was still full of basic errors. A more accurate representation of her proficiency would have been S:1, L:1, R:1-, W:1+ (approximately equivalent to IELTS S:3.5, L:3.5, R:3, W:4.5).
2. A male nurse originally from India was referred to ISLPR Language Services for testing. He had been educated in India in an English speaking school, he had done his nursing training in English and had worked for some time in a hospital where English was the main language of communication. He migrated to Australia and had taken IELTS many times, having spent some \$10,000 on IELTS tests, even, on one occasion, returning to India in the vain hope that it would be easier to take the test there. When asked what the problem was, he replied that every time he took IELTS the reading texts and writing tasks bore no relationship to the language of nursing. When tested on the ISLPR, his proficiency was found to be little short of native-like.
3. In fact, ISLPR Language Services has encountered many instances of nurses who have taken IELTS many times (many from 10 to 20 times) but have been unable to achieve the levels required for registration yet their actual practical proficiency when tested on the ISLPR[®] was, in the majority of cases, very high and more than the level required for their work as a nurse or for registration purposes. Invariably, when they were asked why they had failed to achieve a higher score on the IELTS tests they had taken, they replied that, each time they did IELTS, the test content was remote from their vocational and language experience. Yet most, when tested on the ISLPR[®], were found to have very high proficiency (some near native-like). Indeed, it was reported anecdotally that most of those tested were granted registration by the Queensland Nursing Council on the basis of the ISLPR[®] test result and the report provided.

4. C was a chef who had been trying to obtain the required IELTS score to obtain a visa to remain in Australia. He had taken IELTS many times but always with a score insufficient to meet visa requirements. Despite being a chef, Candidate C was required to obtain IELTS 6 in each macroskill since he was a tradesperson applying for a permanent visa, Subclass 885.

In fact, when C was tested on the ISLPR, he was found to have quite a high level of practical proficiency, much more than enough to be able to survive in an English-speaking community and far more than he would require to be able to successfully perform his work as a chef (as he had been doing for a long time at the time he was tested).

The following is an excerpt from the report written on his ISLPR test:

C was rated at S:3+, L:3, R:3+, W:2+. Universities that require IELTS 6 for entry to particular courses usually require 3 in all macroskills on the ISLPR®. In fact, if one compares the scale descriptors, ISLPR® 3 is at least equivalent to IELTS 6 and is nearer to IELTS 6.5. ISLPR 2+ is commonly related to IELTS 5.5 but, if one compares the descriptors, it is nearer to IELTS 6.

There is no doubt that C's proficiency in all four macroskills is sufficient that English should not intrude on his capacity to carry out the duties of his vocational area and, equally, that he has sufficient general English proficiency in all macroskills for everyday purposes. I cannot comment on his overall vocational competence since that relies on much more than language proficiency and involves areas such as vocational knowledge and skills that lie outside my expertise to comment upon. However, I understand from the documentation I have received and from what he told me during the interview that he successfully trained as a cook and completed an Advanced Diploma in Hospitality Management since coming to Australia. He has also successfully held a position as a cook for several years and received a promotion during that time.

Granted his proficiency levels, the fact that he has successfully completed an Advanced Diploma in Australia, and that he has held a position successfully for several years and been promoted during that time, there seems to be strong evidence that he has a level of practical proficiency in English at least sufficient for his current employment and for everyday living purposes and that he can carry out his duties without English inhibiting his performance.

I rated his writing proficiency at ISLPR W:2+, as discussed above, only slightly lower than the equivalent of IELTS 6. Indeed, the errors that he made in writing did not intrude on the comprehensibility of what he wrote and he seemed very well able to express his ideas quite clearly and precisely. Furthermore, I would be confident that, if C were to be able to take individual tutorials in writing with a properly trained ESL teacher, he should be able to eliminate most of his errors fairly quickly.

In brief, I believe that C has appropriate English language skills to enable him to work safely in his chosen vocation whether as a cook or in another area of hospitality and he has sufficient English proficiency to cope adequately in using English for everyday purposes.

5. The adverse effects on both candidates and Australian industry are well illustrated in a recent project undertaken by ISLPR Language Services Pty Ltd. The aim of the project was to identify the English language proficiency requirements for foreign workers in the Australian beekeeping industry. The beekeeping industry is of vital importance to Australia not only for the production of honey and other related products but also because the Australian agricultural industry is largely dependent on beekeeping and honey bees for pollination of the plants. The problems that prompted the request for this investigation are:
- i. The industry finds it impossible to attract enough Australian workers and so relies heavily on recruiting foreign workers who come in on 457 visas.
 - ii. To obtain a 457 visa, the worker needs to have at least 5 years' experience in the industry and achieve an IELTS Overall Bandscore of 5 with no score below 4.5. Some of the present workers came into Australia before this requirement came in but now, in order to renew their visas, they must take IELTS but many find this requirement impossible to achieve and are required to leave Australia despite the fact that they are valued workers whom the employer wishes to retain.
 - iii. The problem with the proficiency requirement is two-fold: first, the content of the IELTS test is inappropriate to the foreign beekeepers; second, the required proficiency levels are too high, certainly significantly higher than is required for work purposes in the industry and higher than is required for everyday survival purposes beyond the farm.
 - iv. Consequently, the individual foreign beekeepers, most of whom wish to remain in Australia, end up taking the test several times at considerable expense, they give up and leave the country, the Australian beekeeper and Australian industry in general lose valued workers, and the employers have to try to recruit new foreign workers and train them in accordance with their own requirements. The departure of the foreign workers amounts to a significant cost to the beekeeper and a serious loss of talent to Australia.

The project is on-going at the time that this submission is being lodged but, for further information, the following is the draft executive summary from the interim report [Ingram, D. E. 2015. "Interim Report on the English Language Requirements and the Suitability of Tests for Foreign Workers in the Australian Beekeeping Industry". Mimeograph]:

Executive Summary of the Report on the Needs Analysis of the Beekeeping Industry:

I The aim of the project was to specify the minimum English language proficiency requirements for foreign workers in the Australian beekeeping industry and to consider the appropriateness of the IELTS test and the current English proficiency requirements.

II The consultant initiated and developed the ISLPR[®], he was the Australian representative on the joint British-Australian project to develop IELTS and was subsequently Chief Examiner (Australia) for 10 years. He has extensive experience in language testing, needs analysis and language needs profiling.

The ISLPR® is most appropriate for the measurement of the English proficiency of beekeepers because the content of the test can be readily adapted to match their needs.

III The current English proficiency requirements for 457 visas are an IELTS Overall Bandscore of 5 with at least 4.5 in all macroskills. There are 5 tests listed as approved though the commonest is IELTS. None are relevant to the needs of foreign beekeepers working in Australia. Applicants for a 457 visa are also required to have worked for at least 5 years in the industry.

IV Australian and foreign beekeepers were interviewed and two beefarms visited. The aim of the visits and discussions was to identify the English language needs of foreign beekeepers working on Australian beefarms, the needs arising from both their need or otherwise of English for work purposes and their general survival needs in Australia.

V The report outlined the nature and importance of the beekeeping industry both as a food source and as a major support of Australian agriculture through its pollination services. The report went on to describe the industry, its scattered nature, the nature and activities of the work involved and the extent to which English is required. The report described the foreign workers who were interviewed, their roles and the level of their English proficiency. The consultations all emphasised the importance of foreign beekeepers to the Australian beekeeping industry, not least because of the difficulty the beefarms have had in recruiting Australian workers and the unsatisfactory nature of their work and commitment in contrast to the foreign workers.

The English language needs of the foreign workers were discussed. It was evident that their English language needs for work purposes are very low, certainly lower than the present requirements. They do, however, need some English for basic survival purposes outside of the workplace. Overall, their English needs are significantly lower than the current requirements suggest. The minimum proficiency level for visa purposes was proposed as S:1, L:1+, R:1, W:1- though, under certain .. conditions [specified in the report], this could be raised to S:1+, L:1+, R:1+, W:1-, still lower than the current requirements. It was also evident that the language content of IELTS is irrelevant to beekeeping.

The possibility of training courses for beekeepers was discussed and recommendations made for English courses to be available, perhaps on-line but with support also being offered in short vacation courses or classes taught by Skype or videoconferencing.

Three problems were repeated throughout the interviews with both the Australian beekeepers and the foreign workers. These related to the difficulties inherent in trying to attract and train Australian workers, the inappropriateness of the IELTS Test and the proficiency requirements, and the claimed lack of government support for the industry, that lack being manifested in the failure to date to do anything about the problems caused by the current unsatisfactory English proficiency requirements for 457 visas.

VI The report recommended:

- 1. That the requirements for 457 visas for foreign workers be set in accordance with the real English proficiency needs for work in the beekeeping industry and for general 'survival' purposes.*
- 2. That the International Second Language Proficiency Ratings (ISLPR®) be added to the list of tests approved for 457 visa applicants.*
- 3. That the minimum proficiency level for a 457 visa for foreign beekeepers be set at S:1, L:1+, R:1, W:1- on the ISLPR and its equivalent on other approved tests provided that a course be available as in Recommendation 4. If such a course is not available, the visa requirement should be S:1+, L:1+, R:1+, W:1- or its equivalent on the other tests (e.g. IELTS S:4.5, L:4.5, R:4.5, W:3.5).*
- 4. That a course or courses be developed to promote the development of the English proficiency of foreign workers in the beekeeping industry. The course or courses should focus on English proficiency for both the beekeeping workplace and general survival needs. The course should be available on-line or be taught via Skype or videoconferencing and be supported by a short face-to-face course during the March to August "down period" for beekeeping in Australia.*
- 5. That, prior to the preparation of the English course in Recommendation 4, a short investigation be carried out to determine which model will be most successful in terms of attracting the foreign workers as students: Skype, videoconferencing, on-line or a centralised classroom-based course.*
- 6. That ISLPR® test results be accepted only from those centres that participate in the appropriate quality assurance through the ISLPR International Accreditation Authority to ensure that only adequately trained testers conduct the test and that results are quality assured (conditions inherent in the management of all the other tests currently approved for 457 visas).*

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APPENDIX TWO: SUMMARY OF THE ISLPR

The following table provides the number of the ISLPR® proficiency level, the short name of each proficiency level, and the introductory summary description from the “General Description of Language Behaviour” of each level. The full description of the proficiency at each level is much longer. Each description of each macroskill at each level fills an A4 page in three columns: General Description of Language Behaviour, Examples of Language Behaviour, and Comment. A full proficiency statement identifies each macroskill separately, e.g. S:1+, L:2, R:1, W:1+.

Number	Name	Short Description of Language Behaviour	Examples of how the Language can be used at this Level
S:0, L:0, R:0, W:0	Zero Proficiency	Unable to communicate in the language.	Unable to use the language for any purpose.
S:0+, L:0+, R:0+, W:0+	Formulaic Proficiency	Able to perform in a very limited capacity within the most immediate, predictable areas of own need, using essentially formulaic language.	Single word utterances or simple formulae in predictable areas of need.
S:1-, L:1-, R:1-, W:1-	Minimum ‘Creative’ Proficiency	Able to satisfy own immediate, predictable needs, using predominantly formulaic language.	Can make simple material purchases or give predictable information about self or immediate others.
S:1, L:1, R:1, W:1	Basic Transactional Proficiency	Able to satisfy own basic everyday transactional needs.	Can make basic transactions in familiar shops, institutions, public transport, restaurant, or in very basic social interactions (e.g. making an appointment).
S:1+, L:1+, R:1+, W:1+	Transactional Proficiency	Able to satisfy own simple everyday transactional needs and limited social needs.	In ‘vocational’ (e.g. work) situations can communicate simple routine needs and provide basic details of less predictable occurrences; in social situations, can make introductions, give basic biographical information, and convey simple intentions or attitudes.
S:2, L:2, R:2, W:2	Basic Social Proficiency	Able to satisfy basic social needs, and the requirements of routine situations pertinent to own everyday commerce and recreation and to linguistically undemanding ‘vocational’ fields	In social situations, can participate in informal conversations on everyday topics in face-to-face situations or on the telephone. In ‘vocational’ situations, can generally communicate own needs and wishes to those with whom they regularly interact. In academic situations, can give a simple spontaneous recount of a personal experience. Some TAFE courses allow entry at this level. The level required by the Immigration Department for Functional English.
S:2+, L:2+, R:2+, W:2+	Social Proficiency	This level is significantly better than Level 2 but has not reached Level 3.	Many TAFE courses require 2+ in all or most macroskills for entry.
S:3, L:3, R:3, W:3	Basic ‘Vocational’ Proficiency	Able to perform effectively in a wide range of informal and formal situations pertinent to social and community life and everyday commerce and recreation, and in situations which are not linguistically demanding in own ‘vocational’ fields.	Some universities accept this as the minimum level for entry to undergraduate degree programmes.
S:3+, L:3+, R:3+, W:3+	Basic ‘Vocational’ Proficiency Plus	This level is significantly better than Level 3 but has not reached Level 4.	Some universities require this as the minimum level for entry to undergraduate degree programmes. Some will accept 3+ for entry to postgraduate degree programmes.
S:4, L:4, R:4, W:4	‘Vocational’ Proficiency	Able to perform very effectively in almost all situations pertinent to social and community life and everyday commerce and recreation, and generally in almost all situations pertinent to own ‘vocational’ fields.	Teacher registration authorities in Australia require 4 in all macroskills as the minimum level of proficiency in English for a non-native English speaker applying for teacher registration. In some situations, may produce language which is virtually indistinguishable from that of native speakers of the same sociocultural variety. Some universities require 4 in all macroskills for entry to some courses.
S:4+, L:4+, R:4+, W:4+	Advanced ‘Vocational’ Proficiency	This level is significantly better than Level 4 but has not reached Level 5.	At this level, people are able to operate as effectively as native speakers in most situations with only slight features of the language differentiating one from the other.
S:5, L:5, R:5, W:5	Native-like Proficiency	Proficiency equivalent to that of a native speaker of the same sociocultural variety.	In even the most complex situations (e.g. delicate diplomatic or business negotiations), no limitations are attributable to language proficiency. In everyday situations and own ‘vocational’ fields, can convey meaning accurately and fluently in informal consecutive interpreting from the person’s first language.