



THE UNIVERSITY OF  
MELBOURNE



**Submission to the Australian Government Department of Immigration and Border  
Protection  
on the discussion paper 'Strengthening the test for the Australian Citizenship'**

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## **1 Background to the Language Testing Research Centre**

Since its establishment in 1990, the Language Testing Research Centre (LTRC) at the University of Melbourne has earned a national and international reputation for its contributions to language testing and assessment as well as program evaluation. The mission of the Centre is:

1. to carry out and promote research and development in language testing;
2. to develop tests and other appropriate proficiency measurement instruments for English and other languages;
3. to evaluate programmes of language learning and teaching;
4. to provide consultancy services in evaluation and testing; and
5. to provide education and training in the area of language assessment.

The LTRC engages in a broad range of projects, some of which are commissioned and others which are grant-funded. Information about the Centre's work is available on the LTRC website: <http://arts.unimelb.edu.au/ltrc>

For more than 20 years, the LTRC has been linked with language assessments used in the process of migration and professional registration. In the 1990s the Centre was part of a consortium responsible for developing the Access (The Australian Assessment of Communicative English Skills), an English test designed to assist the then Commonwealth Department of Immigration and Multicultural affairs (DIMA) in the migration selection process (Brindley & Wigglesworth, 1997), Centre staff have also, for example, done research on the use of IELTS in the migration and professional registration pathways of graduate accountants and engineers (Knoch, May, Macqueen, Pill, & Storch, 2016) and we have a long-standing association with the Occupational English Test (OET), a specific-purpose language test recognised for the purpose of registering overseas-trained health professionals seeking to practise in Australia (see e.g. Elder et al., 2013; McNamara, 1996). Professor Tim McNamara, the developer of the current format of the OET, is closely associated with the LTRC and was Centre Director for several terms. The LTRC also has experience with other workplace assessments such as the assessment of language proficiency of teachers (both English and LOTE) (Elder, 2001; Elder & Kim, 2014) and aviation personnel (see e.g. Knoch, 2012).

Staff and associates of the LTRC are also involved in research projects for providers of other major English language tests, including the International Language Testing System (IELTS), the Pearson Test of English Academic and the Test of English as a Foreign Language (TOEFL). Consequently, a high level of expertise is available in the area being considered in the current discussion paper.

## **2 Response to discussion paper**

We would like to thank the Department of Immigration and Border Protection for providing us with the opportunity to make a submission in response to the discussion paper entitled 'Strengthening the test for Australian citizenship'. We comment on two areas in this submission, (1) the proposed introduction of a separate upfront English language test and (2) the proposed changes to the Australian citizenship test.

## 2.1 Introduction of separate upfront English language test requirement

We would like to comment on five separate areas in relation to the proposed introduction of a separate upfront English language test requirement: (1) the appropriacy of testing language as part of citizenship requirements, (2) the suitability of the IELTS test in this context, (3) the scope of what should be tested in this context, (4) the level required on an English language test and (4) the appropriacy of re-testing English for applicants who have previously applied for permanent residency. Each of these areas is discussed in more detail below.

### 2.1.1 Appropriacy of testing English language as part of citizenship requirements

The requirement of knowledge of English has a symbolic function, which was reflected in the 1948 legislation calling for a 'basic' knowledge of English, a requirement that was implemented sympathetically, so that the assessment of English at interview became a ritual of inclusion. The current insistence on 'competent' English changes the requirement into a means of exclusion for many would-be citizens. The symbolic function of English underlying the changes is now being exploited politically to draw a line between 'us' English speakers and 'them', which is unnecessary and divisive. The role of language in citizenship requirements is often justified on practical grounds ('you need English to function in Australian society'). While some knowledge of English can reasonably be expected, the question is how much. Research has shown that in a multilingual and multicultural society such as ours, people can function adequately within their own multilingual networks, and at the same time contribute effectively to the society with relatively low levels of English. This is further discussed in 2.1.4 below.

### 2.1.2 Suitability of IELTS

IELTS was developed as an academic skills test and in our view is not suitable as a general proficiency test for establishing readiness for citizenship. It was developed to establish whether people were ready for two kinds of education and training: academic education via the Academic module, and general training in the General Training module – the latter was developed in the context of people coming to the UK for training as firemen, policemen, etc. It is therefore important to understand that the IELTS General Training module, while called 'general', is not a test of general English language skills but a test of academic English. We therefore do not deem IELTS suitable for use in this context. If an English test is recommended, this should be one which focuses on functional English rather than on academic English skills.

### 2.1.3 Scope of testing

The IELTS test is designed to test four skill areas, listening, reading, writing and speaking. It is important to remember that many potential applicants for citizenship come from areas in the world where they may not have had the opportunity to access formal schooling and therefore may not be literate or sufficiently literate to complete the IELTS test. However, this does not mean that their English language skills are inadequate for everyday communication and for functioning in the Australian society. We therefore advocate that the DIBP consider either using a different existing test for these applicants or commissioning a custom-designed test which focuses on general communicative abilities in English with a particular focus on speaking and listening ability rather than on the highly developed literacy skills measured by the IELTS test (which, as already noted, was developed for academic training purposes). Using an interview format, which does not rely on the test taker being able to read prompt materials or other written texts, may be sufficient to assess the language level of such applicants. In Section 2.1.4 below we also present an alternative model used in some European countries which acknowledges a person's commitment to learning English, rather than requiring English literacy skills that are unattainable for many aspiring citizens in a short time period.

#### 2.1.4 Level required on English language test

We have pointed to problems associated with the range of English skills tested by IELTS, but the minimum required level of performance that has been proposed is also problematic. Acquiring high levels of English proficiency takes many years and IELTS 6 is an unreasonably high level in the context of citizenship. IELTS 6 corresponds to level B2 on the well-known scale of the Common European Framework of Reference (<https://www.ielts.org/ielts-for-organisations/common-european-framework>) and may be beyond the reach of many Australian born citizens with low literacy backgrounds. Research has moreover shown that the levels required for citizenship in various European countries are lower, ranging from A1 to B1 (Pulinx, Van Avermaet, & Estramiana, 2014). The Australian level (B2) is above this range and represents a more severe requirement than that of any country in Europe; there can be little justification for this. In addition, in the UK, an alternative pathway was created to show a person's commitment to learning English: completion of ESL courses and demonstration of progress met the language requirements of citizenship. We recommend that the latter model is followed in Australia thereby providing incentives for aspiring citizens to learn English over time rather than imposing what may in some cases be insuperable barriers to their achieving their goals. Allowing an alternative (non-test) English learning pathway of course also requires that ample opportunities be provided for appropriate English language tuition, access to which is currently severely limited.

#### 2.1.5 Appropriacy of re-testing people who have previously passed language requirements for permanent residency

Many potential applicants for Australian citizenship will have previously applied for permanent residency through various pathways, such as skilled migration. To meet the requirements for skilled migration, these people would have had to fulfil a requirement to prove their language ability. We consider it unfair and redundant to ask these people to have to prove their language proficiency again. There is no evidence that any of these people would lose their English language skills while working in Australia. On the contrary, their skills are more likely to develop over time as a result of exposure to English and opportunities for English use in the community. It is not therefore reasonable to ask potential applicants to face the additional burden of having to pay for another English language test. While IELTS and other recognized test scores are officially only valid for two years, this is an arbitrary stricture with no underpinning in research (see e.g. Roever, 2013). There is no reason not to accept a previous IELTS result after four or more years as long as the applicant has continued to reside in Australia.

## **2.2 Proposed changes to Australian citizenship test**

In this section our comments relate to 1) the language levels required to understand the citizenship test materials, 2) the possibility of offering the citizenship test in multiple languages and 3) the proposed limitations on opportunities to resit the test in the event of repeated failures.

#### 2.2.1 Research into language level required to understand materials in citizenship test

Research (e.g., McNamara & Ryan, 2011) has shown that the materials in the current knowledge of society test for citizenship, which is offered only in English, demand a high level of English (B2 on the CEFR scale). This, as we have argued above, is unreasonably high. The complexity of the materials makes the test in its current form unnecessarily difficult for people with English proficiency below this level; research confirms that failure rates among refugees, many of whom have limited education, are high (Ryan, 2013). Any proposed revisions to the current citizenship test should bear the factor of English difficulty in mind (see further discussion under 2.2.2. below). Ignoring this English barrier threatens both the validity and the fairness of the instrument used, which risks failing to assess what it was designed to assess and instead imposes an arbitrary barrier preventing

vulnerable groups in particular from attaining their goal of becoming fully participating members of Australian society.

### 2.2.2 Possibility of presenting citizenship test materials in applicants' language

Given that knowledge of society is required in the citizenship test, it should be possible to demonstrate that knowledge in any of the major languages of immigrant communities. The same should be true for any testing of cultural values, of the kind proposed in the government brief. Test preparation booklets explaining the format of the test and signalling the kinds of content to be covered on the test could also be provided in these immigrant languages. Recasting the citizenship test as a measure of learning achievement (similar to what occurs with a driving test, where candidates may study manual of road rules before performing the test itself) would serve the purpose of encouraging applicants to acquire the relevant understandings that would assist them in adjusting to the Australian culture and living harmoniously in this country rather than restricting access to these understandings. The testing of English, if implemented, should be a separate matter, and aimed at the lower level needed for day-to-day transactions, rather than that required to read and understand material about Australian history, society and institutions.

### 2.2.3. Test resit policy

The current proposal that applicants for citizenship be given a limited number of chances to retake the test is presumably based on the notion that repeated failures can be taken as evidence that the applicant neither understands the workings of Australian society nor shares its values and that this situation is irredeemable. If the candidate fails the test due to limitations in English literacy this assumption cannot reasonably be drawn, hence our recommendation that the test be administered in immigrant languages that are easy for the applicant to understand (see above). In any case, we believe that repeated attempts to pass the test (which will come at considerable cost to the candidate) are more likely to be a measure of determination to become a full voting member of Australian society, than an indication of any fundamental incapacity or unsuitability. The provision of pathways (e.g. test preparation courses) that will facilitate relevant learnings and understandings seems a more productive approach to integrating people who have already been admitted to this country and ensuring their readiness to become full members of the society. We are therefore opposed to the idea of placing limits on repeat testing.

## **3 Summary**

In this submission we have commented on two major policy changes outlined in the government discussion paper "Strengthening the test for Australian citizenship": the first being to introduce a compulsory language testing regime which demands high levels of competence to be demonstrated in English speaking, listening, reading and writing skills before aspiring citizens can take the Australian Citizenship Test and the second being to make the citizenship testing requirements more extensive and stringent than is currently the case. While we understand that these measures are intended to signal that becoming an Australian citizen is a privilege which should not be taken lightly and to ensure that only those who understand Australian society and share Australian values can be accorded this privilege, we are concerned that the measures proposed will be counterproductive.

The decision to adopt a test designed to assess readiness for formal study which places high demands on literacy skills will unfairly disadvantage vulnerable candidates, including older migrants and refugees who have

experienced interrupted schooling and may lack the relevant literacy skills. The high level of English required to achieve the stipulated band score of 6 on this test (or equivalent measures) is unrealistic and means that many worthy candidates will struggle to reach the proposed passing standard and therefore be unable to affirm their allegiance to the Australian society. If an English test is introduced (and we have some doubts about its necessity) it should be a different kind of measure assessing everyday communicative competence in English to a level that is eventually attainable by all categories of applicant. The proposal to extend the scope and rigour of the Australian Citizenship Test is likewise unfair and unrealistic unless the test and associated test preparation materials are made available in the applicant's own language.

In both cases we believe the emphasis of government policy should be on facilitating access to English tuition and encouraging the understandings needed for applicants to make a more informed and effective contribution to Australian society. This is best done by providing further avenues for the learning of English and other relevant knowledge and by certifying achievements in these learnings, rather than through a punitive testing regime which may have the unintended consequence of further disenfranchising those already on the margins of our society.

The Language Testing Research Centre hopes this submission makes a positive contribution to the Department of Immigration and Border Protection consultation. The Director of the LTRC can provide further supporting information if required.

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