

# The Unsuitability of English Proficiency Tests as a Criterion for Citizenship in Light of the Definition of Competency and Test Candidate Performance

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## Executive Summary

In April 2017, the Australian Government proposed replacing the requirement of 'basic' proficiency in English with 'competent' proficiency in English as a criterion for citizenship. The Australian Government Department of Immigration and Border Protection (thereafter, 'the Department') currently provides that competency in English can be proved by undertaking certain tests of English proficiency, the most common of which are IELTS and TOEFL, and achieving minimum scores in the different assessment components of each test.

This level of English is extremely high. While the Department accepts the tests of English proficiency as proof of competency, the threshold which the Department has devised is much higher than that of the tests themselves. While the tests require overall satisfactory performance, the Department requires satisfactory performance in each of the four assessment components; namely reading, writing, speaking and listening. This will lead to the disqualification of many aspiring citizens who have underperformed in one component but have nonetheless achieved overall competency by compensating in another component. Countries from which many citizens would be likely be disqualified include China, Hong Kong, Korea, Japan and India.

Data compiled by the academic institutions responsible for conducting these tests show that candidates who undertake these tests for migration purposes have a much lower chance of meeting the high threshold of competency. In 2016, for example, the average migrant completely failed to achieve satisfactory results in the speaking component of TOEFL.

Many recipients will most likely never be able to achieve this required level of English language proficiency, particularly in their writing skills. This has been discussed in Gillian Stevens, 'Age at immigration and second language proficiency among foreign-born adults' (1999) 28 *Language in Society* 555.

Applicants for many permanent visas are currently not required to possess such English language competency. For instance, the parents visa, business visa, spouse visa, protection and many other types of visa do not currently require an applicant to have sat an English test to attain their permanent visa. These holders of permanent visas often have quite basic English language competency and will most likely never be able to achieve the new proposed competency as defined in the aforementioned English language tests.

I personally have in the past assisted many business visa-holders who are now established in Australia, operating their respective businesses and employing Australian citizens and permanent residents. They have sufficient English language skills to run their businesses and to make positive contributions to their Australian communities. It is my opinion that very few of these migrant success stories will be able to attain an IELTS score of 6.0 in the writing component, and therefore will never be able to become citizens of this country, the only home they have and where their children were born. This sounds no more dramatic than it is in reality for them.

## The Impact of the Proposed Changes on Multiculturalism

Australian multiculturalism is a shining example to every nation on earth that it is possible to create a cohesive, vibrant prosperity by attracting and integrating migrants from all corners of the world to a nation which expects the respect of certain shared values from them but which promises respect for who they are when they come. This has been a tremendously successful paradigm shift in Australia's modern history, perfectly suited to the modern globalised world in which we must compete. This mutual respect is at the very heart of multiculturalism.

The proposed English language competency requirements for citizenship will cause significant damage to Australia's successful multiculturalism as it sends a clear message that some people, even though fully integrated (as employed or self-employed tax-payers) are never welcome to become 'full' Australians. It will create divisions within Australian society which are unnecessary and corrosive.

### Citizenship brings no new burdens

Citizenship is not in any way any new burden in terms of cost to the Australian community or governments. People whom will be affected are already living here and are presently benefiting from, as all Australian residents are entitled to benefit from, access to Medicare, public education and social security. Financially, it does not make sense to restrain such people from attaining citizenship.

### Competency: A New Requirement

In April 2017, the Australian Government (2017) proposed that aspiring citizens be required to sit an upfront English test to show that they are 'competent' in English before they can undertake the Australian citizenship test. The proposed requirement significantly changes current law whereby aspiring citizens need to undertake the citizenship test in English to prove that they have a level of 'basic' English.

The Department of Immigration and Border Protection (2017) states that *competency* in English can be shown by providing evidence that the applicant either is a citizen of certain English-speaking countries or has undertaken any of the five tests of IELTS, OET, TOEFL iBT, PTE Academic or Cambridge English: Advanced, and has achieved the minimum respective scores. Currently, the Department requires at minimum:

- a. a score of 6.0 in each of the four test components of an IELTS test, or
- b. a score of 'B' in each of the four test components of an OET test, or
- c. scores of 12, 13, 21 and 18 in, respectively, listening, reading, writing and speaking in a TOEFL iBT test, or
- d. a score of 50 in each of the four test components of a PTE Academic, or
- e. a score of 169 in each of the four test components of a CAE test.

By way of analysis of the two tests of IELTS and TOEFL iBT, which are the most common tests of English undertaken for migration purposes in the context of Australia, this report seeks to show that the application of these tests as a prerequisite for citizenship is prejudicial to migrants in general,

and in particular to migrants from countries from where many Australian permanent residents and aspiring citizens have emigrated. The detrimental impact of the application of English tests stems firstly from the higher threshold of *competency* which the Department has devised, as opposed to the threshold devised by the tests themselves, and secondly from the fact that generally, test candidates who undertake the tests for migration purposes on average score lower than the competent test candidate.

In reaching its conclusions, the report has utilised data provided by the Department, as well as official performance reports in the two tests of IELTS and TOEFL iBT. Citations have been provided where appropriate and references appear at the end of the report.

## IELTS and the Higher DIBP Standard

The International English Language Testing System (IELTS 2017) is one of the tests of English language proficiency which is accepted by the Department and consists of four assessment components: listening, reading, writing and speaking. IELTS candidates are categorised into nine Bands depending on their performance. A 'competent user' is one who achieves an 'Overall Band Score' of 6.0. A competent user under IELTS:

*has an effective command of the language despite some inaccuracies, inappropriate usage and misunderstandings. They can use and understand fairly complex language, particularly in familiar situations.*

The Department of Immigration and Border Protection (2017) requires a score of 6.0 in each of the four assessment components before an aspiring citizen can undertake the citizenship test. However, achieving a score of 6.0 in the test has proven to be challenging especially in the context of migration to Australia. Performance of migrants in 2015 in the IELTS shows the difficulty of achieving a score of 6.0. Many of these migrants were from countries which are top-ranking in their number of permanent residents in Australia (DIBP 2016). Most significantly, residents from five countries, including Korea and Japan, on average did not achieve a score of 6.0 in any of the four test components. These test takers would have been disqualified from sitting the citizenship test because of the difficulty in achieving a score of 6.0.

The difficulty of achieving a score of 6.0 becomes even more significant once the higher threshold of competency devised by the Department, as opposed to the actual threshold devised by IELTS, is taken into account. Under IELTS (2017), a test candidate is considered competent if they have achieved an *average* score of 6.0 across the four components. Under the definition of the Department of Immigration and Border Protection (2017), however, a competent user must have achieved a score of at least 6.0 in *each* of the four test components. This means that, for example, a test candidate who has achieved scores of 6.5, 6.5, 5.0 and 7.0 in the four test components will be disqualified from sitting the citizenship test, even though they have achieved an average score of 6.5 and are considered a competent user for the purposes of IELTS. The standard of proficiency expected by the Department is difficult to meet.

Consequently, in addition to residents from the five countries who on average fail to score an overall score of 6.0, many test candidates from another *seventeen* countries, including China, Hong Kong, India and Taiwan, will also be disqualified because they would have failed to achieve at least a score of 6.0 in one, two or three test components (IELTS 2016). Some of these test candidates, such as the

example given above, would have scored an Overall Band Score of 6.0 or above and would be categorised as a competent user under IELTS; nonetheless, they would have been disqualified as non-competent users for Department purposes. The following table lists the twenty-two countries which, in 2015, would have failed to produce satisfactory results. For a more detailed insight as to performance see Appendix 1.

Performance	Countries	Number of Countries	Result
1 component below 6.0	Hong Kong; India; Indonesia; Iran; Italy; Mexico; Philippines; Turkey	8	Ineligible to undertake the citizenship test
2 components below 6.0	Bangladesh; China; Jordan; Nepal; Syria; Ukraine	6	
3 components below 6.0	Columbia; Taiwan; Vietnam	3	
4 components below 6.0	Japan; Korea; Saudi Arabia; Thailand; United Arab Emirates	5	
	Total	22	

The proposed changes to the English language competency requirements will have a significant impact on the immigration of skilled migrants and migrants in receipt of family visas to Australia. According to data published by the Department of Immigration and Border Protection (2016) regarding immigration patterns in 2014-15, out of the 20 countries which produced the highest number of skilled people migrating to Australia on a permanent visa, on average, residents of 9 countries would be affected. These countries are, in order, India, China, the Philippines, Nepal, Iran, Bangladesh, Korea, Vietnam and Indonesia. Out of the 20 countries which produced the highest number of migrants on family visas, 10 would be affected. These consist of, in order, China, India, the Philippines, Vietnam, Thailand, Korea, Indonesia, Hong Kong, Nepal and Syria. For a more detailed insight into migration patterns see Appendix 3.

For the sake of completeness, the same set of data shows that in 2015 speakers of Thai, Korean, Albanian, Japanese, Arabic, Punjabi, Ukrainian and Gujaurati, on average failed to achieve an Overall Band Score of 6.0. In total, speakers of twenty languages failed in at least 1 test component. Data obtained from the Australian Bureau of Statistics (2017) shows that many of these languages are widely spoken in Australia. For a more detailed insight into candidate performance grouped by language see Appendix 2.

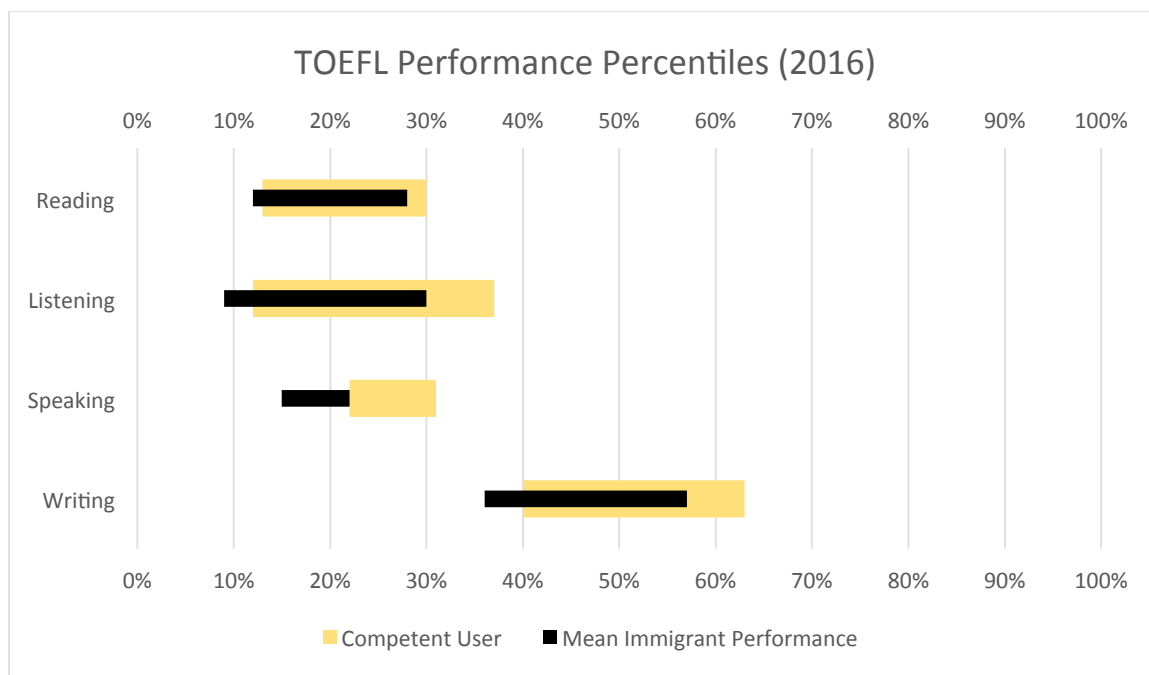
### TOEFL, the Higher DIBP Standard and Migrant Performance

The Test of English as a Foreign Language (TOEFL) is another common test of English proficiency and assesses the candidate in reading, listening, speaking and writing. According to the Educational Testing Service (2017a), the institution responsible for conducting the test, a competent user under

IELTS would score at least 13; 12; 18; and 21, respectively, in the reading, listening, speaking and writing tests. These values have been adopted by the Department of Immigration and Border Protection (2017) as criteria for proof of competency.

While the Department accepts the numerical values provided by the TOEFL as to competency in the four assessment components, it is critical to point out that, as with the IELTS, the Department has devised a much higher threshold for competency, compared with that of the Educational Testing Service itself. Under TOEFL, a test candidate which achieves an overall mark of over 60 is considered a competent user regardless of the composition of the score with respect to performance in each of the four assessment components. The Department, however, requires that the test candidate achieves minimum marks in *each* of the four test components. A test candidate who has achieved an overall score of 60 or above by compensating in one component for unsatisfactory performance in another will be disqualified from undertaking the Australian citizenship test. While the Educational Testing Service does not produce reports with respect to performance per country of origin or native language spoken, it can be expected that, as with the IELTS, the use of the TOEFL as a criterion for citizenship will produce similar results.

Other than the complexities of the higher standard of English expected by the Department, the negative impact of the proposed language requirement is further highlighted in light of the performance of test candidates who undertook the TOEFL for migration purposes. Data compiled by the Educational Testing Service (2017b), summarised in the chart below, shows that 2016 TOEFL test candidates for migration purposes performed, on average, worse than the objective competent user in *all* the four assessment components. Most significantly, the average migrant *completely* failed to meet the expectation of the Department with respect to the speaking component. It is true that some migrants would have achieved satisfactory results for speaking and more significantly, it is true that many of the migrants would have nonetheless achieved an overall score of 64 despite underperforming in the speaking or another component; yet, all of the migrants who scored below 18 for speaking would have been automatically disqualified from undertaking the citizenship test.



### Conclusion

This report has demonstrated that performance in the tests of English proficiency is unsuitable as a criterion for citizenship. The unsuitability of the tests stems from, firstly, the higher standard of English which the Department of Immigration and Border Protection has devised, as opposed to the tests themselves. English language proficiency tests such as IELTS and TOEFL categorise a test candidate as competent if this candidate has performed satisfactorily overall in the tests. The Australian Department of Immigration and Border Protection, however, requires satisfactory performance in each of the separate components of the tests, which leads to the disqualification of aspiring citizens who have underperformed in one component, but compensated in another.

The second reason that the tests are unsuitable is the difficulty in achieving *competency* by migrants and people from countries from which many Australian permanent residents and aspiring citizens have emigrated. The report's author asserts that the introduction of the proposed language requirements will be detrimental to these migrants, many of whom are, in light of data published by the Department, currently permanent residents in Australia.

The proposed changes, whose benefits are spurious, will inflict damage on Australia's successful visa programs, Australian multiculturalism and on the very fabric of the nation's diverse and successfully cohesive society.



## APPENDICES

### Appendix 1 – IELTS General Training – Average Score by Candidates' Country of Origin (2015) (IELTS, 2016)

Place of origin	Listening	Reading	Writing	Speaking	OVERALL
Saudi Arabia	4.7	3.7	4.2	5	4.5
UAE	4.9	3.9	4.5	5.2	4.7
Thailand	5.3	4.8	5.1	5.5	5.2
Korea	5.7	5.3	5.3	5.4	5.5
Japan	5.8	5.4	5.4	5.7	5.6
Taiwan	5.9	5.5	5.5	6	5.8
Colombia	5.9	5.9	5.8	6.1	6
Ukraine	6	5.9	5.8	6.2	6
Nepal	6.1	5.5	5.8	6.1	6
Jordan	6.1	5.7	5.7	6.3	6
Bangladesh	6.1	5.7	5.9	6.2	6
Vietnam	6.1	5.9	5.8	5.9	6
China	6.1	6.1	5.7	5.8	6
Iran	6.1	5.8	6	6.4	6.1
Italy	6.1	6	5.7	6.3	6.1
Mexico	6.1	6.2	5.7	6.3	6.1
Syria	6.2	5.8	5.8	6.4	6.1
Turkey	6.2	6.1	5.8	6.2	6.1
Indonesia	6.3	6.1	5.8	6.2	6.2
Philippines	6.4	5.9	6	6.4	6.2
India	6.4	6	5.9	6.3	6.2
Egypt	6.4	6.1	6	6.4	6.3
Sri Lanka	6.4	6.1	6	6.6	6.3
Hong Kong	6.6	6.4	5.9	6.2	6.3
Venezuela	6.3	6.6	6.1	6.5	6.4
Pakistan	6.4	6	6.2	6.6	6.4
Nigeria	6.3	6.1	6.3	6.9	6.5
Lebanon	6.7	6.3	6.1	6.6	6.5
Brazil	6.5	6.7	6.1	6.7	6.6
Spain	6.6	6.7	6.1	6.5	6.6
Poland	6.8	6.6	6.1	6.8	6.6
France	6.8	6.7	6.2	6.7	6.7
Russia	6.8	6.9	6.2	6.6	6.7
Australia	7	6.6	6.3	7.1	6.8
Germany	7.1	6.8	6.4	7.3	7
Malaysia	7.3	6.9	6.4	6.9	7
Singapore	7.7	7.4	6.8	7.4	7.4
South Africa	7.7	7.3	7.1	8.2	7.6
USA	7.6	7.4	7.3	8.3	7.7
Ireland	7.8	7.3	7.3	8.5	7.8

Appendix 2 – IELTS General Training – Average Score by Candidates’ First Language (2015) (IELTS, 2016)

First language	Listening	Reading	Writing	Speaking	OVERALL
Thai	5.3	4.8	5.1	5.5	5.2
Korean	5.7	5.3	5.3	5.4	5.5
Albanian	5.3	5.2	5.6	6.2	5.6
Japanese	5.8	5.4	5.4	5.6	5.6
Arabic	5.8	5.3	5.4	6.1	5.7
Punjabi	6	5.4	5.6	5.8	5.8
Ukrainian	5.9	5.8	5.7	6.1	5.9
Gujaurati	6.1	5.7	5.6	5.9	5.9
Nepali	6.1	5.5	5.8	6.1	6
Vietnamese	6.1	5.9	5.8	5.9	6
Chinese	6.2	6.1	5.7	5.8	6
Italian	6.1	6	5.7	6.3	6.1
Turkish	6.2	6.1	5.8	6.2	6.1
Farsi	6.1	5.8	6	6.4	6.2
Spanish	6.2	6.3	5.9	6.4	6.2
Bengali	6.3	5.8	6	6.3	6.2
Tagalog	6.3	5.8	6	6.3	6.2
Indonesian	6.3	6.1	5.8	6.2	6.2
Telugu	6.4	5.9	6	6.3	6.2
French	6.3	6.2	6	6.4	6.3
Tamil	6.4	6	6	6.4	6.3
Filipino	6.4	6	6.1	6.4	6.3
Singhalese	6.4	6.1	6	6.5	6.3
Ibo/Igbo	6.2	6	6.4	6.8	6.4
Yoruba	6.2	6.1	6.3	6.8	6.4
Other	6.3	6	6.3	6.9	6.4
Urdu	6.4	6	6.2	6.6	6.4
Creole	6.4	6.1	6.1	6.7	6.4
Romanian	6.4	6.3	6	6.5	6.4
Malayalam	6.5	6.2	6.1	6.4	6.4
Russian	6.5	6.5	6	6.5	6.4
Serbian	6.7	6.4	5.8	6.4	6.4
Kannada	6.7	6.2	6.2	6.7	6.5
Hindi	6.7	6.3	6.1	6.6	6.5
Portuguese	6.6	6.7	6.1	6.7	6.6
Marathi	6.8	6.4	6.3	6.7	6.6
Polish	6.8	6.6	6.1	6.8	6.6
English	7.1	6.7	6.7	7.4	7
German	7.2	6.9	6.5	7.3	7
Afrikaans	7.4	7	6.8	7.9	7.4

Appendix 3 – Australia’s Migration Programme – Country ranking 2014–15 (DIBP, 2016)

Rank	Permanent visas			
	Family Stream	Points Tested Skilled Migration	Employer Sponsored	Total Skill Stream
1	China	India	UK	India
2	India	China	India	China
3	UK	Pakistan	Philippines	UK
4	Philippines	UK	Ireland	Philippines
5	Vietnam	Philippines	China	Pakistan
6	Thailand	Iran	South Africa	Ireland
7	Afghanistan	Bangladesh	Korea	South Africa
8	USA	Sri Lanka	Nepal	Nepal
9	Pakistan	Nepal	USA	Iran
10	Korea	Malaysia	France	Sri Lanka
11	Indonesia	Ireland	Canada	Malaysia
12	Malaysia	South Africa	Italy	Bangladesh
13	Sri Lanka	Singapore	Brazil	Korea
14	Canada	Vietnam	Malaysia	USA
15	Lebanon	Egypt	Germany	Vietnam
16	South Africa	Korea	Sri Lanka	Singapore
17	Ireland	Russia	Vietnam	Canada
18	Hong Kong	USA	Indonesia	France
19	Cambodia	Indonesia	Pakistan	Indonesia
20	Nepal	Kenya	Bangladesh	Germany
Other	Iraq	Myanmar	Myanmar	Myanmar
	Myanmar	Syria	Iraq	Syria
	Syria	Iraq	Syria	Iraq

Countries shaded in Red would have been affected based on performance in IELTS in 2015, had the proposed language requirements come into effect in that year.

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