



Australian Government  
Department of Immigration  
and Citizenship

**Submission**

In-Confidence  
For decision

PCMS Reg. Number

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**To** Minister

**Subject** Alternative English Language Tests

**Purpose** To seek your approval to include the s. 22(1)(a)(ii) English language test under the Migration Regulations for visa purposes.

**Urgency** N/A

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**Alternative English Language Test Submissions**

Currently the Migration Regulations only specify one test of English language proficiency for visa purposes with a few limited exceptions. This limits the flexibility in handling language testing demands and on compliance and policy initiatives.

In May 2008 (Submission CE2008/01301) you approved benchmarks (Attachment A) which potential alternative English language tests must meet to be considered acceptable for visa purposes. You also agreed to the Department publishing these benchmarks and seeking submissions against the requirements from prospective English test providers.

To date, four testing companies have provided submissions for the following alternative English language tests (provided at Attachment B):

s. 22(1)(a)(ii)  
[Redacted]

s. 22(1)(a)(ii)  
[Redacted]

s. 22(1)(a)(ii) | s. 47C(1) | s. 22(1)(a)(ii) | s. 22(1)(a)(ii)

s. 22(1)(a)(ii)

s. 22(1)(a)(ii) | s. 47C(1) | s. 22(1)(a)(ii)

s. 22(1)(a)(ii)

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s. 22(1)(a)(ii)



**Attachments**

Attachment A Benchmarks for alternative English proficiency tests.

s. 22(1)(a)(ii)

Attachment C Assessments of submissions received.

s. 22(1)(a)(ii)

s. 22(1)(a)(ii)



**BENCHMARKS FOR  
ALTERNATIVE ENGLISH LANGUAGE PROFICIENCY TESTS**

The following benchmarks will be used to assess submissions on English Language tests for Australian visa applications.

Test owners should address their capacity to meet each of the benchmarks in respect of their English Language test/s and provide evidence to support all claims made.

**1. Integrity**

- a. Regular updating of test content to minimise potential for prior knowledge of test material. Frequency of updating would depend on rate of test usage. (Mandatory)
- b. Measures in place, and practices observed, to minimise risk of identity substitution  
**Example:** At time of application candidates must present their passport or national identity card with a number, photograph, date of birth and signature and on test day they must present the same ID document. (Mandatory)
- c. Document fraud prevention measures, including:
  - i. embedded photographic image of candidate and online results verification. (Strongly Desired)
  - ii. Test reports must incorporate security features to prevent tampering and forgery. **Example:** Security enhanced paper. (Mandatory)
- d. Standardised testing conditions including invigilators trained in detection of inappropriate use of electronic devices, maximum invigilator:candidate ratio of 1:25, and secure and independent test centre locations. (Mandatory)
- e. If computer-based testing is used, in addition to the requirements at (d) above, measures to prevent candidates accessing other tools such as the internet must be in place. (Mandatory)
- f. Standardised training and ongoing certification of test markers. (Mandatory)
- g. Security of storage and control of test material to prevent unauthorised access. (Mandatory)
- h. Systems in place to ensure that clerical test markers and invigilators have a competent level of English to enable them to fully understand the test marking policy and/or are able to understand and comply with directions concerning relevant security practices. (Mandatory)
- i. Character checks conducted on clerical test markers, examiners and invigilators. (Desired)
- j. Systems in place to ensure that clerical test markers, examiners and invigilators avoid any potential or perceived conflict of interest (that is, by not marking, assessing or invigilating candidates they have taught or with whom they have any personal connections). (Mandatory)
- k. Maintain records of previously conducted tests for a minimum of two (2) years for audit purposes and integrity checks. (Mandatory)

s. 22(1)(a)(ii)

## 2. Content of tests

- a. Testing instrument must measure all four (4) English language skills, which are reading, writing, speaking and listening. (Mandatory)
- b. Systems in place to ensure test validity and reliability **Example:** Test content provides a realistic measure of English language ability with no gender or ethnic bias, and tests are developed by appropriately qualified persons. (Strongly Desired)
- c. Stimulus materials should reflect type of materials candidates are likely to encounter in an Australian study context, and are drawn from a variety of cultural sources. (Desired)
- d. Oral materials should reflect the variety of world Englishes. (Desired)

## 3. Administration

- a. Online verification of test scores facility, and preferably capacity for electronic transmission of test scores directly into DIAC systems. (Strongly Desired)
- b. Sufficient availability of testing centres to preclude the need for applicants to travel long distances to sit a test, particularly in Australia's key market/s. (Strongly Desired)
- c. Testing available in all centres with sufficient frequency to ensure that applicants do not experience unreasonable delay in being able to access the test (while minimising exposure of test questions). (Strongly Desired)
- d. Reasonable cost to applicant to sit the test. (Mandatory)

## 4. Results

- a. Able to benchmark test scores against scores in other accepted DIAC tests (embedded in DIAC legislation) to ensure comparability of test results. (Mandatory)
- b. Descriptors for each score in each test. (Mandatory)
- c. Test provider undertakes ongoing monitoring of short and long term performance trends and investigates unusual patterns and changes. (Mandatory)
- d. Use of test by other institutions/authorities as an indicator of experience and international recognition. (Mandatory)
- e. Results to be available to candidates within four (4) weeks of sitting a test. (Strongly Desired)
- f. Test results to be valid and available for verification for a period of at least two (2) years. (Mandatory)

\*The Benchmarks set out in this document are only intended to provide a guide to some of the matters that the Minister may have regard to when considering specifying an English language proficiency test pursuant to clause 5A102 of the Migration Regulations 1994. In making his decision under clause 5A102, the Minister may also have regard to other matters which he considers are relevant to the exercise of his discretion and which are not set out in this document.

\*\*The Minister has the power to revoke the specification of a test for any reason that he considers relevant.

s. 22(1)(a)(ii)

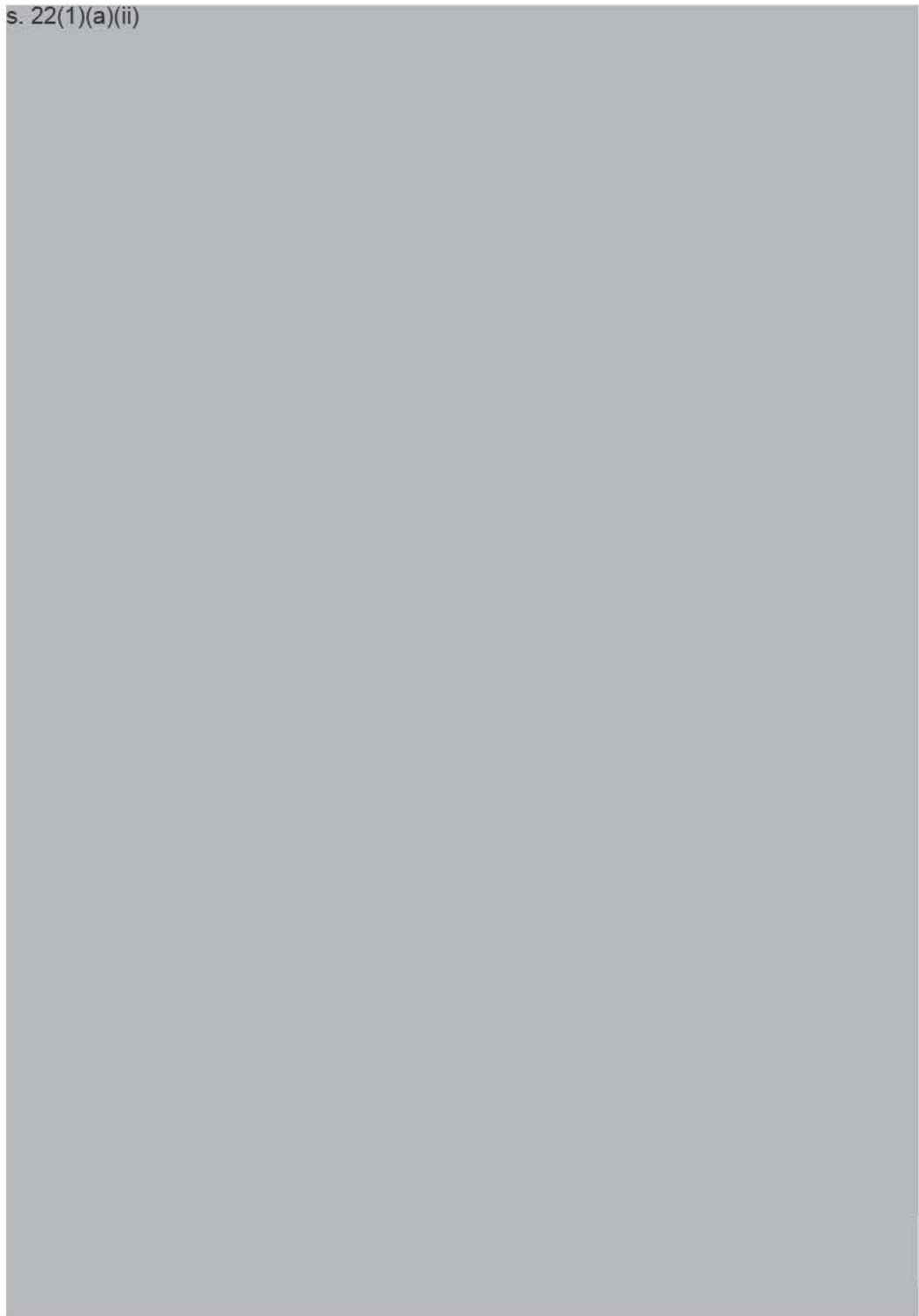




ATTACHMENT C

ASSESSMENT OF SUBMISSIONS

s. 22(1)(a)(ii)

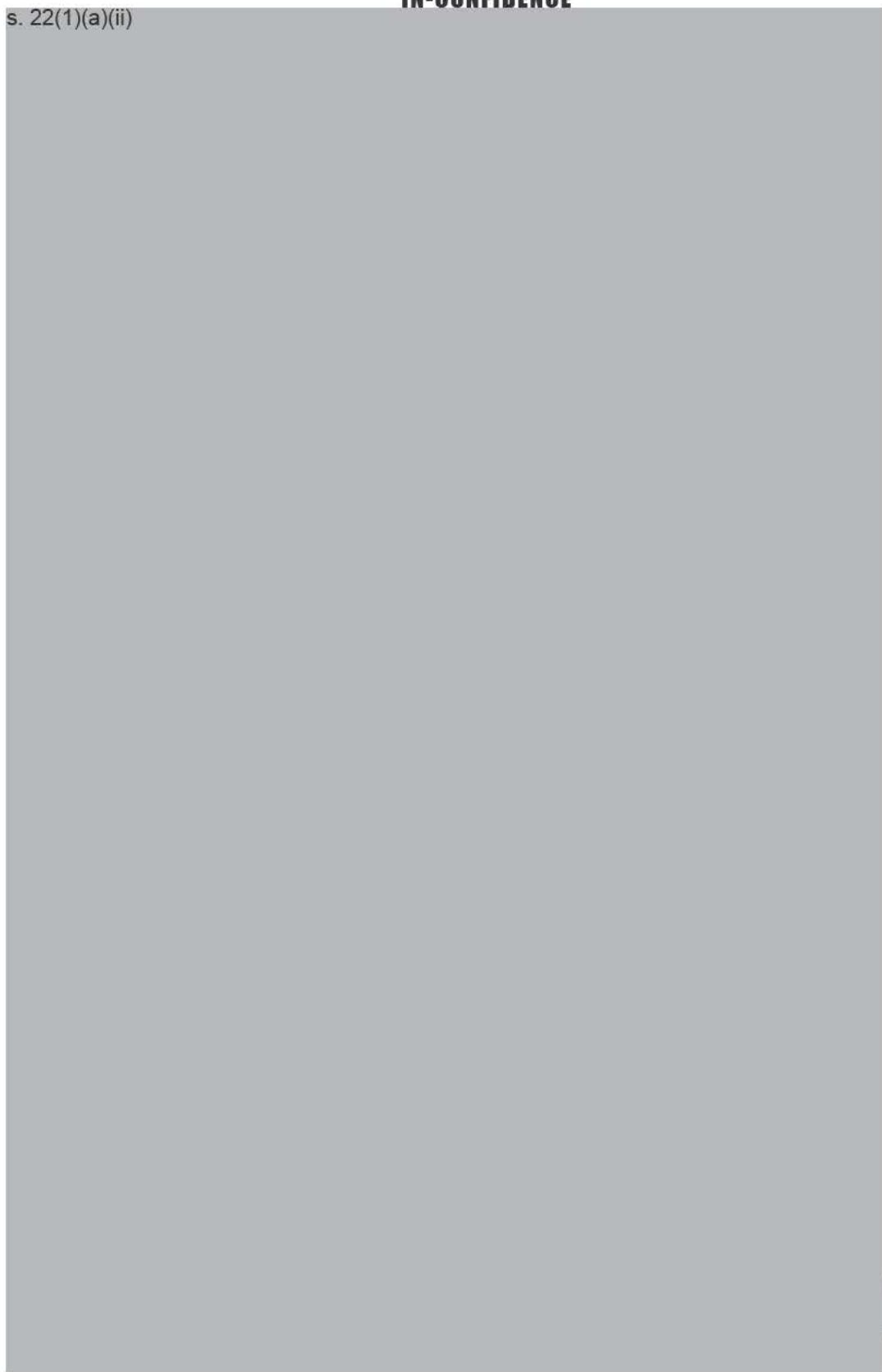


s. 22(1)(a)(ii)



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s. 47C(1)



s. 22(1)(a)(ii)

