

ISLPR LANGUAGE SERVICES PTY LTD

ABN 83 138 312 919

personalising assessment and instruction

Level 1, Office Suites
Shopping Centre
218 Padstow Road (cnr Warrigal Road)
Eight Mile Plains
Brisbane

PO Box 4659
Eight Mile
Plains
QLD 4113
AUSTRALIA

Phone/Fax: +61 (0)7 3423 2505

info@islpr.org
www.islpr.org

7 September, 2011

The Director,
Employer Sponsored and Business Skills Section,
Department of Immigration and Citizenship,
P.O. Box 25,
Belconnen, ACT, 2616.

Dear Sir/Madam,

I am pleased to attach a submission from this company to the "Permanent Employer Sponsored Visa Review".

If there is any other assistance or additional information we can provide the review, we would be pleased to do so.

Yours sincerely,



Professor David E. Ingram, AM
Co-Director
ISLPR Language Services Pty Ltd

**Submission to the “Permanent Employer Sponsored
Visa Review” of the Department of Immigration and
Citizenship**

from

ISLPR Language Services Pty Ltd

Office Suites
Eight Mile Plains Shopping Centre
218 Padstow Road (cnr Warrigal Road)
Eight Mile Plains
Queensland, 4113.

Postal Address: P.O. Box 4659
Eight Mile Plains
Qld, 4113.

Email: info@islpr.org

Webpage: www.islpr.org

This submission has been prepared by Professor David E. Ingram AM, Co-Director of ISLPR Language Services Pty Ltd on behalf of his fellow Directors.

INTRODUCTION

This submission is prepared in response to Section 3.8, on Page 16, “Further Comment”, of the *Discussion Paper: Review of the Permanent Employer Sponsored Visa Categories*¹ (henceforth referred to as “the discussion paper”). That section “welcomes further comment and suggestions” on the themes of the paper.

In particular, we wish to propose that the *International Second Language Proficiency Ratings* (ISLPR[®])² be recognised as an alternative instrument for specifying standards and for testing purposes for Vocational English.

In this submission, we do not wish to question the decision to specify Vocational English in terms of IELTS levels and to allow the use of IELTS to test candidates under the visa requirements in the discussion paper. Indeed, the present writer (David Ingram) was one of the three persons in 1987- 88 responsible for the development of IELTS as a joint Australian and British test and he has had significant involvement with IELTS since then, including as Chief Examiner (Australia) for ten years. However, we would, in passing, note that IELTS was not designed for use as a vocational test but as a test for entry to academic and training programs. ISLPR^{®3} does not have this limitation since, as will be discussed further below, its design is such that it can readily be used to test in “specific purpose” areas of the language and, in particular, it is readily adaptable for testing for vocational proficiency in any of the possible vocational areas of English.

Nor do we wish, in this submission, to question the levels specified for Vocational English in the discussion paper. We wish to observe that, for the reasons just stated and elaborated below, it is readily possible to test for and specify Vocational English proficiency in ISLPR terms, including, if required, with reference to particular fields (e.g. Vocational English for Engineers, Vocational English for Plumbers, Vocational English for Hairdressers, Vocational English for Nurses, and so on).

On p. 12 of the discussion paper, reference is made to Functional English, which is specified as IELTS 4.5 in all four macroskills (speaking, listening, reading and writing). Related to this is the specification⁴ issued by the Minister for Immigration and Citizenship on 8 December 2010, in which “Functional English” is defined as ISLPR 2 across all four macroskills. In other words, the Department of Immigration and Citizenship (henceforth, the Department) seems to define Functional English as either IELTS 4.5 or ISLPR 2. Given this, Vocational English would be deemed to be ISLPR 2+. Like IELTS, ISLPR[®] results are specified in terms of each macroskill, e.g. S:2, L:2+, R:2, W:1+ though, unlike

¹ Australian Government, Department of Immigration and Citizenship. August 2011.

² Ingram, D. E. and Elaine Wylie. 1979/2010. *International Second Language Proficiency Ratings*. Eight Mile Plains: ISLPR Language Services Pty Ltd.

³ The trade mark ISLPR[®] is owned by Elaine Wylie and David Ingram, Co-Directors of ISLPR Language Services Pty Ltd.

⁴ Commonwealth of Australia. 8 December 2010. *Immigration (Education) Act 1971 – Specification under Subsection 3 (2) – Procedures or Standards for Functional English*, issued by Chris Bowen, Minister for Immigration and Citizenship.

IELTS, for important theoretical and practical reasons⁵, ISLPR does not recognise an “Overall” rating.

However, if an outcome of the present review should be to revise the levels specified for Functional English or Vocational English, Elaine Wylie and the present writer, as the authors of the ISLPR and the present writer as one of the original developers of IELTS, would be pleased to provide advice on the interpretation of the IELTS and ISLPR proficiency scales and on the setting of ISLPR equivalences for whatever IELTS levels might be specified.

An appendix to this paper summarises the credentials of ISLPR Language Services Pty Ltd and its Co-Directors, Elaine Wylie and the present writer.

Recognition of ISLPR[®] for Testing and the Specification of Levels

As already noted, ISLPR 2+ can be equated for present purposes to IELTS 5 for Vocational English. Here, we wish to present, in summary form, the case for the acceptance of ISLPR[®] for specifying Vocational English and the case for ISLPR[®] to be accepted for testing purposes to assess whether or not a person has achieved Vocational English. This case will be stated briefly but we would be happy to elaborate on the arguments in support of each point. Alternatively, the reader may wish to refer to the ISLPR Language Services webpage where many papers are available on the ISLPR[®] and related testing matters, especially under the name of the present writer. A brief description of the ISLPR is provided in Appendix Two.

Origin: ISLPR[®] was initially developed in 1978 and released in 1979⁶, partly for use in the Adult Migrant Education Program, in which it has continued to be used for many purposes for more than 30 years. It was initiated by David Ingram and developed jointly by him with Elaine Wylie. David Ingram and Elaine Wylie have continued to research and administer the ISLPR but it has also been in widespread use by others, to measure learners’ language proficiency, and to certify English proficiency for vocational and many other purposes.

Standard: Ever since its first release, the ISLPR has been used as a standard to specify required proficiency for many purposes, e.g. for entry to universities; for legal purposes; in legislation; in stating regulations such as the Department’s “Procedures or Standards for Functional English” referred to earlier; in specifying goals and entry and exit levels for language courses; in categorising teaching and reading materials; in particular, for vocational registration or employment (e.g. for taxi drivers nationwide and for teachers throughout Australia, New Zealand and Kiribati).

⁵ It is common experience that learners’ proficiency in one macroskill may (and commonly does) differ from their proficiency in another. Since that is so, it is meaningless to add all four together and take an average as an “overall” rating.

⁶ From its initial release in 1979 to 1997, the ISLPR was known as the Australian Second Language Proficiency Ratings (ASLPR). Its name was amended in 1997 in recognition of its widespread use internationally and its appropriateness for use in other contexts besides Australia.

Recognition: As is evident from its status as a “standard” for the expression of language proficiency levels, the ISLPR is widely recognised and accepted. It is accepted by universities, TAFEs and many other educational institutions for entry by international students. The results of ISLPR tests expressed in terms of the ISLPR scale are also widely accepted for vocational registration purposes, as already mentioned above. It has been used for, challenged and accepted in courts of law in both Australia and the United States; Elaine Wylie (the co-author and Co-Director of ISLPR Language Services) has been engaged as a consultant by health professional systems to rate health professionals who were registered to practise in Australia but whose skills were in question. David Ingram has also tested numerous nurses for similar purposes. Elaine has been engaged by a shipbuilding company to determine whether overseas-trained tradesmen were capable of communicating adequately to satisfy safety concerns and by Centrelink to assess the proficiency of an overseas-born employee pre- and post- a 12-month intervention programme. In addition, ISLPR has influenced the development of other international tests such as the ACTFL Guidelines, IELTS, ACCESS and, to a lesser extent, the Common European Framework as well as other locally used tests in Australia and overseas. AMESs are able to use the ISLPR to test and certify Functional English.

Authenticity Measuring Practical Ability: The focus of ISLPR, both in its descriptions of proficiency levels and in its administration, is on the individual learner’s practical ability. In practice, it is administered by eliciting the learner’s maximum language behaviour and rating it by matching it against the detailed descriptions of language behaviour that make up the 12-level (0 to 5) ISLPR scale.

Any test is a “snapshot in time” in the hope that the performance in the test will generalise to real life. This would seem more likely to be so the more the test situation approximates to real-life situations. The gap between tests that require candidates to sit in serried ranks and tick boxes or fill gaps is obviously much greater (and the generalisability much less) than in a test such as the ISLPR where the focus is on eliciting the learner’s language behaviour in situations and tasks that approximate as closely as possible to real-life language situations and tasks relevant to the particular individual. This gap between the test and real-life language use explains much of the dissatisfaction that is voiced about tests like TOEFL or IELTS, which are compromise tests aiming to measure language ability but designed for mass administration around the globe where, often, there is little ability to control the expertise of the examiners.

In brief, the ISLPR system tests, measures and certifies practical ability with the tester observing the candidate’s practical language behaviour in situations and tasks that replicate as closely as possible the situations and tasks that the learner encounters in real life. Where the test is for vocational proficiency (e.g. measuring Vocational English), an ISLPR test is designed to put the learner into relevant vocational situations performing language tasks relevant to that vocation. No other test recognised by the Department is designed to do this.

Adaptiveness: ISLPR is an adaptive test, whose adaptiveness enables it to measure practical ability in a variety of different fields whether for general, academic or vocational purposes. The assessment procedure does not rely on a

pre-determined set of standardised items that may or, more often, may not be relevant to the learner or the actual purpose of the test. Rather, it relies on a trained and moderated assessor's ability to elicit the candidate's maximum language ability in the particular contexts (in this case, the vocational situations and tasks) that are relevant to the candidate and the purpose of the testing; that language behaviour is then matched against the elaborated "criteria" or descriptions of language behaviour that make up the 12 levels of the ISLPR scale from zero to native-like ability in each macroskill. Because the test does not rely on a pre-determined set of standardised items, its use can readily be adapted for application in a variety of vocational and other situations involving tasks relevant to those situations and to the purpose of the test. Thus, unlike most "traditional" format tests, the ISLPR can readily, validly and reliably be used for specific purpose assessment, in particular for vocational proficiency assessment or, in the present case, to test for and certify Vocational English.

It is appropriate to consider further the difference between general proficiency and specific purpose proficiency and its implications both for a test and for a candidate's ability to use the language in real-life situations. Any speaker with general proficiency may still not be able to perform in a specific purpose area; for example, even a native speaker who is not medically trained may have difficulty understanding a discussion between medical people or even the instructions of a medical practitioner and, linguistically, may be quite unable, themselves, to discuss a medical issue in the forms used by doctors or nurses. Thus, on the one hand, a more general test may not give a valid or reliable measure of a person's ability to communicate and understand in a specific vocational register (e.g. nursing, hairdressing, cooking, carpentry, physics teaching). On the other hand, candidates are routinely found to be able to perform better in a test focusing on the specific purpose language of the vocation in which they have most experienced the language and, regularly in our testing of students, teachers and nurses in ISLPR Language Services, we find candidates who have failed to achieve their desired results on IELTS (often on many occasions), who complain about the relevance of items encountered, but who we find, when tested in their particular academic or vocational area, are highly proficient.

In other words, if one wants to measure the extent to which a person who has learned English as a second or foreign language and experienced it in a particular vocational context can cope (i.e. can communicate and understand) in the language used in that vocation, the test itself should focus around the specific language of that vocation. Only ISLPR as an adaptive test can do this readily and for each candidate though, if required, it can also, and routinely does, test in the context of general proficiency.

In summary, the ISLPR is an adaptive test, which enables the test procedure to focus specifically on the practical language ability of candidates in specific vocational areas (as well as, if required, on general, academic or other proficiency). It is not a test of specific grammatical knowledge or knowledge of individual elements of the language but focuses on each candidate's ability to put all the elements of the language together for practical communication purposes: it measures a candidate's ability to carry out realistic language tasks in realistic situations and how (i.e. in what language forms) they are carried out.

ISLPR is already recognised and used for Vocational Registration: As has already been discussed, the ISLPR is already widely recognised and used for vocational purposes, including vocational registration. Soon after its initial publication, it was adopted by the then Queensland Board of Teacher Registration (now the Queensland College of Teachers) to measure and certify the English of overseas-trained teachers applying for registration in Queensland. It has continued for 30 years to be used for that purpose in Queensland and its recognition has spread to other States and Territories and has recently been accepted under new national specifications. As noted above, the ISLPR is also used for vocational registration for teachers in New Zealand, where Elaine Wylie regularly tests overseas-trained teachers and the Kiribati Government has adopted it for the specification of teachers' minimum English proficiency. For many years, it was formally accepted by the Queensland Nursing Council as an English test for overseas-trained nurses and there is currently a formal submission before AHPRA for it to be recognised under the new national arrangements for nurse accreditation. In addition, the present writer regularly tests nurses who have been unsuccessful in taking the IELTS test on referral from the Queensland Nurses Union: those who achieve an appropriate ISLPR level and are recommended for registration have generally gained that registration. In 2009, the National Transport Council adopted the ISLPR for the specification of English language standards for non-native English speaking taxi drivers. In NSW, the NSW Adult Migrant English Service uses the ISLPR to test overseas-trained professionals, students enrolled in workplace courses, and other groups such as police trainees, compensation insurance applicants, and applicants for taxi driver licenses.

Combining results from Two Tests: Though, in most ISLPR tests, all four macroskills are tested and the results certificate shows the scores for all four macroskills, some end-users (e.g. some universities and registration authorities such as Griffith University and the Queensland College of Teachers) allow candidates to combine the results from two (or, sometimes, more) tests including results from two different tests (e.g. IELTS and ISLPR). This is possible because ISLPR results do not provide an "overall" result for the reasons stated earlier and specific ratings are provided for each macroskill. There is a considerable cost advantage to candidates if they are permitted to combine results since ISLPR Language Services charges substantially reduced fees for one or two macroskills while it also reduces test anxiety for the candidate at least on the second or subsequent occasion. There seems little reason (other than additional fees to the testing organisation) why combining results should not be permitted so long as the time between the tests does not exceed that permitted for the life of test results. Nevertheless, insistence on results from one test sitting or allowing two or more test results to be combined is a matter for the end-user (the Department, in this case) and ISLPR Language Services can accommodate either decision.

Validity and Reliability of the ISLPR: Since its initial development, the ISLPR has been subjected to frequent trials of its validity and reliability. In 1980-81, the initial formal trials found a very high level of concurrent validity and of inter-rater reliability amongst both Australian (first language speaking) and Chinese (foreign

language speaking) assessors⁷. Many other studies of validity and reliability have been published and, again, have found high levels of various forms of validity (including predictive and construct validity) and reliability (including both inter-rater and intra-rater reliability and test-re-test reliability). For conciseness, these studies are not discussed in detail here but further information is available on request.

Security: The nature of the ISLPR test means that test security is much less a problem than it is with more traditional tests since the content of tests differs from candidate to candidate and, in the extremely unlikely situation where a candidate appears to have guessed what will be “on the test”, the tester is readily able to amend the content.

In ISLPR Language Services, all candidates are photographed prior to the test, the photographs are embedded on the results certificates, and all certificates carry the company’s embossed seal. Invigilators are instructed to check each candidate for electronic devices (e.g. mobiles) or notepaper and all tests are administered individually so that all candidates take the test under the immediate supervision of the tester for speaking, listening and reading while CCTV is used to monitor each individual candidate during the writing test. All tests are audio-recorded for checking and record purposes and as part of our security procedures (e.g. for voice identification in the event of any query about a candidate’s actual identity). All results are checked by one of the Co-Directors, who also sign the results certificate.

Quality Assurance: Unlike so-called “standardised” tests, the ISLPR relies on a strict quality assurance process to ensure that the test is conducted appropriately and that the results are valid. If the ISLPR is approved for the certification of Vocational English, as the authors of the ISLPR and the owners of the intellectual property and the trade mark, ISLPR[®], we would strongly recommend that appropriate quality assurance procedures be mandatory. In ISLPR Language Services, all testers are required to be trained, to undergo a period of induction under the supervision of the ISLPR authors and Co-Directors, and are provided with refresher training at appropriate intervals. All tests are checked by one of the Co-Directors for both the quality of the interview and of the writing test and the validity of the ratings assigned; feedback is provided to the tester to ensure that any deficiencies are immediately rectified. This procedure also operates with those testing centres which have licensing agreements with ISLPR Language Services (see below) and which are required to submit videorecordings of a proportion of their tests to ISLPR Language Services for review and feedback.

The validity and reliability of the ISLPR when properly administered according to the procedures taught and implemented by the authors (the owners and co-directors of ISLPR Language Services) have already been discussed. Unlike IELTS, clerical markers are not used to mark the tests: trained testers administer the test and rate all macroskills. As already noted, all tests are audio-recorded for checking purposes.

⁷ See Ingram, D. E. 1985. *Report on the formal Trialling of the Australian [now International] Second Language Proficiency Ratings (ASLPR, now ISLPR)*. Canberra: Australian Government Publishing Service/Department of Immigration and Ethnic Affairs, 1984.

Proposal: We recommend that the ISLPR be recognised as an alternative way of specifying Vocational English, i.e. that Vocational English be identified (as in the discussion paper, Section 3.3, page 12) as IELTS 5 in each macroskill of speaking, listening, reading and writing or as ISLPR 2+ in each macroskill.

We also recommend that ISLPR be recognised as an acceptable test for use in measuring and certifying candidates' Vocational English.

Implementation: Here we provide two alternatives for the implementation of the proposal above.

First, our preferred option is for ISLPR Language Services Pty Ltd as the owners of the ISLPR intellectual property and trade mark to be approved to administer the ISLPR and to certify candidates for Functional English and for Vocational Proficiency as required in the section "English Language Standards" in the discussion paper (page 12).

In addition to the issues already discussed in favour of recognising the ISLPR for testing and specifying Vocational English, the following observations support this proposal for the recognition of ISLPR Language Services Pty Ltd:

- Elaine Wylie and David Ingram are the authors of the ISLPR, prescribed its administration process, and own the intellectual property and the trade mark of the ISLPR[®] though we have not hindered other persons and organisations from using it for purposes internal to their organisations.
- Though, on paper, ISLPR Language Services is a small commercial organisation, our ISLPR testing history and experience go back more than 30 years and, prior to 2007, we administered the ISLPR through Griffith University, which continues to support our activities by recommending ISLPR Language Services to their students. In addition, our staffing arrangement gives us the flexibility to cope with fluctuations in demand since we have a number of trained testers who have tested for us over many years and who can be called upon when the workload justifies it. We also receive frequent requests from other persons to be trained in the ISLPR and to work for us. In other words, if ISLPR Language Services is approved to administer tests for Functional and/or Vocational English, we do not anticipate any problem in coping with any likely demand.
- We routinely test, not only at our offices in Eight Mile Plains, but wherever in Australia or overseas there is a demand for our services. Within recent weeks, for example, we have tested not only in Eight Mile Plains but also in Canberra, in New Zealand and in Kiribati. We are currently negotiating to administer tests to Korean students and teachers either on-line using Skype or in Korea. We have also several times tested university students in Japan on-line using Skype. In other words, we are willing to test wherever there is a demand subject only to cost-effectiveness or the availability of on-line facilities and appropriate and trusted administrative support for invigilation purposes.

- ISLPR Language Services also offers candidates services that are not available with other tests. Feedback on their test is available for candidates who request it, generally candidates who have been unsuccessful in gaining the proficiency level they require and who are better able to improve their English if they know where their weaknesses lie and how to go about improving their proficiency. This contrasts with, for example IELTS, where the lack of feedback undoubtedly contributes to the multiple, unsuccessful tests that some candidates are obliged to take without knowing what is going wrong. In addition, we offer individual tutorials for candidates who want individualised tuition in order to improve their language skills. We also provide ISLPR Preparation workshops, mainly aimed at informing candidates about the test and how best to prepare for their test by building up their practical proficiency. These contrast with other “Preparation” courses that do little more than teach test-taking techniques that have little impact on candidates’ language ability but distort their results. We also provide written documents free of charge that provide advice on how candidates can improve their proficiency.
- ISLPR tests are available virtually on-demand. Because they are individual tests, the only constraint on their offering is the availability of a tester. They are available at our premises at any time through business hours at least 5 days a week, 51 weeks a year (the office is closed Christmas to New Year). When we test inter-state or overseas, we routinely test up to 7 days a week, depending on local requirements and test numbers.

The second option is analogous to the manner in which other testing systems such as IELTS, TOEFL, and OET operate, i.e. the test owner trains testers, controls procedures and moderates tests. In addition to tests being carried out by ISLPR Language Services, we would license other organisations to test using the ISLPR on condition

- (1) that ISLPR Language Services trains their testers, who must have appropriate qualifications and be able, by the end of the training, to demonstrate appropriate interview and testing strategies and an acceptable level of validity and reliability in their ratings;
- (2) that the organisation enters into a quality assurance arrangement under which ISLPR Language Services is able to review a proportion of their tests and provide feedback on the quality of their testers’ interviewing and testing and on the validity of their ratings; and
- (3) that the organisation and its testers adhere to a graduated accreditation arrangement under which the proportion of each tester’s tests to be moderated declines (but never to zero) as the quality of their testing increases.

A detailed outline of the licensing arrangement and the costs is available on request.

Further Information

If any additional information should be required in support of this submission, Dr David Ingram or Elaine Wylie would be pleased to provide it. They may be contacted on 07-3423-2505 or by email at info@islpr.org or to their individual email addresses at d.ingram@islpr.org or e.wylie@islpr.org .

Additional information, including papers dealing with aspects of proficiency assessment and the ISLPR, is also available on the company webpage at www.islpr.org.

We would also be pleased to provide the names and contact details of referees who can speak authoritatively about the ISLPR[®], about ISLPR Language Services Pty Ltd, and about the ISLPR co-authors and Co-Directors of ISLPR Language Services, Elaine Wylie and Professor David Ingram, AM.

APPENDIX ONE

The Credentials of ISLPR Language Services and its Co-Directors

More detailed information about ISLPR Language Services Pty Ltd, Elaine Wylie and Dr David Ingram is available on the company webpage at www.islpr.org .

David E. Ingram

David Ingram has a significant national and international reputation in the area of applied linguistics, not least with respect to language testing, which was one of the areas mentioned when he was appointed a member of the Order of Australia in 2003. He initiated the ISLPR in 1978 as a spin-off from his Ph.D. research and developed it together with his colleague and now Co-Director and Co-Owner of ISLPR Language Services Pty Ltd, Elaine Wylie. They jointly own the intellectual property and trade mark of ISLPR®. A short curriculum vitae follows.

Curriculum Vitae for Professor David Ingram AM B.A., A.Ed. (Qld), M.A., Ph.D. (Essex)

Professor David Ingram holds the following **university degrees**: Bachelor of Arts and Certificate in Education from the University of Queensland, Australia, and the Master of Arts in Applied Linguistics and Doctor of Philosophy degrees from the University of Essex, England.

David Ingram has had a long **career** at all levels of education. He taught for 14 years in Primary and Secondary Schools in Australia and overseas before entering teacher education in the early 1970s at the then Mt Gravatt College of Advanced Education (later the Mt Gravatt Campus of Brisbane C.A.E.). From 1983 to 1986, he was head of the comprehensive teacher education programme at the (now) Charles Darwin University in the Northern Territory and was founding Director of the Institute for Applied Linguistics in Brisbane College of Advanced Education from 1986 to 1989. From 1990 to 2003, he held the Chair in Applied Linguistics at Griffith University, Brisbane, where he was also foundation Director of the Centre for Applied Linguistics and Languages. He was Executive Dean of the School of Applied Language Studies in Melbourne University Private (MUP), Melbourne, Australia, from January 2004 to December 2005, at which time MUP was merged back into the parent University of Melbourne. In 2006, he was a Professorial Fellow in the Faculty of Education in the University of Melbourne. From 30 December, 2006, he was appointed an Honorary Professorial Fellow in the Faculty of Education, University of Melbourne (to 31 December, 2011). In December 2006, he returned to Queensland, where he has undertaken various consultancies in applied linguistics and, for 18 months, worked as part-time consultant Director of a private language centre providing on-line English courses principally to Korea. Together with his ISLPR® co-author, Elaine Wylie, he also directs a private language testing company, ISLPR Language Services Pty Ltd, to promote the use of their language proficiency assessment system, the International Second Language Proficiency Ratings (ISLPR®).

While the principal focus of his teaching and research has been in the area of language education, his administrative experience has been more diverse and he has specialised for some 25 years in the management of commercial academic programmes. He has substantial experience of educational administration, especially at university level. He has headed departments in schools and universities including as Director of three language teaching and research centres, as the Head of a comprehensive teacher education programme, and as Executive Dean of the School of Applied Language Studies in Melbourne University Private.

David Ingram has been active in **professional and advisory organisations** from local to State, national and international levels. He was President of the Australian Federation of Modern Language Teachers Associations for 14 years to 1996, Vice-President of the World Federation for six years, and, from 1992 to 1996, a member of the Australian Language and Literacy Council, the principal advisory body on language policy to the Federal Minister for Education. For some 30 years to 2003, he served on various language advisory committees for the Queensland Board of Secondary School Studies (under its various names). From 1978 to 1983, he was the Academic Adviser to the Australian Department of Immigration for the development of new on-arrival Adult Migrant English Programmes. He has been a Fellow and Adjunct Fellow of the National Foreign Language Center, Washington DC, since 1993. He was the Australian representative on the joint British-Australian project to develop the IELTS Test in 1987-88 and was then IELTS Chief Examiner (Australia) for ten years to 1998. He was then on the Board of Directors of IELTS Australia until early 2003. Since returning to Queensland in December 2006, he has continued to undertake a variety of research-related consultancies for IELTS Australia. In May, 2005, he was appointed by the Council of the University of Melbourne as Honorary Professorial Fellow with the title of Professor in the Department of Language, Literacy and Arts Education, Faculty of Education, University of Melbourne, from 1 June, 2005 to 31 May, 2008. On leaving the University of Melbourne in December 2006, he was made an Honorary Professorial Fellow of the Faculty of Education in the University of Melbourne for the five years to December 2011.

David Ingram has also undertaken a variety of consultancies in such areas as language testing, language education policy, language teacher education, second language education, language profiling, and the evaluation of university departments and international language centres for such organisations as the Australian Government's aid organisation (AIDAB and then AusAID), government departments, education authorities, universities, etc both across Australia and overseas. In 2009-2010, he led a major English proficiency testing activity (based on the ISLPR) for AusAID in Kiribati to test and report on the English proficiency of all the teachers in Kiribati, to test and report on the pre-course and post-course proficiency of cohorts of in-service and pre-service teachers, and to guide the Kiribati Teachers College lecturers in the development of a new test of English for use in all primary and secondary schools in Kiribati.

He has published extensively in applied linguistics with his **publications** appearing in journals, books and conference presentations around the world. He is the co-author of the International Second Language Proficiency Ratings (ISLPR). His most recent book is *Fostering Positive Cross-Cultural Attitudes through Language Teaching* [Teneriffe: PostPressed; 2008], in which three co-authors assisted with the research. Another significant book is *Language Centres: Their Roles, Functions and Management* [Amsterdam: John Benjamins Publishing Company, 2001]. Another major publication released in March 2006 by Multilingual Matters is *Language Diversity in the Pacific: Endangerment and Survival*, a collection of papers by eminent linguists and applied linguists on the languages of the Southwest Pacific. His next book currently in the final pre-publication stages is *A Short History of the Australian Federation of Modern*

Language Teachers Associations. A list of his publications is available on the company webpage.

David Ingram has received a number of **awards, honours** and other recognition for his work in education. He is an Honorary Life Member of the Modern Language Teachers Association of Queensland and the Queensland Association for Teachers of English to Speakers of Other Languages. In 1994, he was awarded the AFMLTA Medal for Outstanding Service to Language Teaching. He has had three Festschrifts published in his honour:

Cunningham, Denis and Anikó Hatoss (eds.). 2005. *An International Perspective on Language Policies, Practices and Proficiencies*. Melbourne: FIPLV and Editura Fundației Academice AXIS. (A volume of language papers on language policy contributed by many of the leading figures in language policy-making around the world.)

A special issue of the journal *Current Issues in Language Planning: Language Planning and Language Teaching: Special Issue in Honour of David E. Ingram*, Vol. 5, No. 4, 2004.

Special issue of *Akita English Studies: Trans-Equator Exchanges: A Collection of Academic Papers in Honour of Professor David Ingram*. Akita, Japan: Faculty of Education and Human Studies, Akita University, March 2001. ISSN 1345-188X.

In the Australian Honours List in June 2003, he was made a Member of the Order of Australia for “*service to education through the development of language policy, through assessment procedures for evaluation of proficiency, and through research and teaching*”.

-oOo- -oOo- -oOo-

Elaine Wylie

Elaine Wylie is the co-developer of the ISLPR together with Dr David Ingram and co-owner and Co-Director, with David Ingram, of ISLPR Language Services Pty Ltd. A short curriculum vitae follows.

CURRICULUM VITAE Elaine Lesley Wylie BA Qld, DipEd Melbourne, MEdSt Qld

Elaine Wylie BA (Qld), DipEd (Melb), MEdSt (Qld)

Elaine is Co-Director, with David Ingram, of ISLPR Language Services Pty Ltd. Previously (1991 to 2006) she was a Research Fellow and then Senior Research Fellow at Griffith University. Before that (1988 to 1990) she was the Director of Studies of the ELICOS program at the Queensland University of Technology. In

1987 she was a member of the Assessment Unit of the Queensland Board of Senior Secondary School Studies, a secondment from her position as Head of the Languages other than English (LOTE) Department of a large Queensland secondary school (1984 to 1986). Before that she taught English and then co-ordinated curriculum development and professional development in the Adult Migrant Education Program in Victoria and Queensland (1972 to 1983).

Elaine is co-author, with David Ingram, of the International Second Language Proficiency Ratings (ISLPR®). She conducts programs around Australia and overseas to train teachers and other language professionals in the use of the ISLPR. She has undertaken numerous research projects involving the use of different versions of the ISLPR in the development of language education policy and methodology, and in the interpretation of the results of other tests.

She has provided advice on language proficiency and its assessment for government departments, secondary and tertiary education systems and professional registration boards in Australia and overseas. Consultancies have included using the ISLPR to determine whether speakers of languages other than English who are involved in legal proceedings need an interpreter (1998), to evaluate AusAID-funded English language training in East Timor (2000), and to establish minimum English levels for non-English-speaking background taxi drivers in Australia (2009/10). She has appeared in court as an expert linguistic witness in common law and criminal cases.

She was a consultant to the International English Language Testing System (IELTS) in the development of the original (1989) video training materials for the Speaking test and conducted many of the exemplar tests used in the training package. She was also asked to review proposed changes to the test in 1994. She has been involved in a number of IELTS research projects, including a 1992 project on validity and reliability of the Speaking test.

Elaine was a foundation member of the International Language Testing Association (ILTA) and has been invited to join ILTA task forces established to survey standards for language testing and develop a Code of Practice. She is an Honorary Life Member of the Queensland Association of Teachers of English to Speakers of Other Languages.

-oOo- -oOo- -oOo-

ISLPR Language Services Pty Ltd

From its inception in 1979 to December 2006, David Ingram and Elaine Wylie developed and administered the *International Second Language Proficiency Ratings* (ISLPR) principally through Mt Gravatt and Brisbane C.A. Es and then Griffith University. When both had retired from universities, they founded the language testing company, ISLPR Language Services Pty Ltd, jointly owned by Elaine and Roger Wylie and David and Nelly Ingram. ISLPR Language Services, as the name indicates, provides a variety of services in the area of applied linguistics (second language education) but principally in English language proficiency testing. At present, the largest regular clientele are international

students seeking entry to universities and other educational institutions and overseas trained teachers and nurses seeking registration in Australia. In addition, it provides tests for other purposes both in Australia and overseas wherever there is need for a practical measure of candidates' language proficiency. Recently, for instance, Elaine has been testing in Canberra and New Zealand and David has been testing in Kiribati where every teacher in the country was to have their English proficiency assessed using the ISLPR under an AusAID-funded project with both pre-service and in-service teachers also having their English proficiency tested pre- and post-course.

More information is available on the company webpage at www.islpr.org while reference has been made earlier in this submission to other activities and aspects of the company's services.

Contact Details: ISLPR Language Services Pty Ltd can be contacted:

- by email at info@islpr.org
- by phone on 07-3423-3505
- by post to P.O. Box 4659, Eight Mile Plains, Queensland 4113.

Dr David Ingram may be contacted:

- by email at d.ingram@islpr.org
- by phone on 0404-837-305 or 07-3423-2505
- or by post at ISLPR Language Services Pty Ltd, P.O. Box 4659, Eight Mile Plains, Qld 4113.

Elaine Wylie may be contacted:

- by email at e.wylie@islpr.org
- by phone on 07-3423-2505
- or by post at ISLPR Language Services Pty Ltd, P.O. Box 4659, Eight Mile Plains, Qld 4113.

APPENDIX TWO

The International Second Language Proficiency Ratings (ISLPR[®])

(i) The ISLPR^{®8}

The *International Second Language Proficiency Ratings* (ISLPR[®]) is the longest standing and possibly the most widely used proficiency scale in Australia [Ingram, D. E. and Elaine Wylie. 1979/2007. *The International Second Language Proficiency Ratings*. Brisbane: ISLPR Language Services]. The ISLPR[®] and the procedures by which it is applied in assessing candidates were originated by David Ingram and developed and continually researched since 1978 by him and his co-author, Elaine Wylie. For more than 25 years, the ISLPR[®] was administered through Griffith University, Brisbane, Australia until, in January 2007 after having retired from universities, the two authors started their own language testing business, ISLPR Language Services Pty Ltd (ILS).

The ISLPR[®] is an adaptive test that can be used to assess proficiency in any language for both general proficiency and proficiency in any specific purpose area. Currently, ILS's principal testing activities focus on the assessment of the English proficiency of international students for entry to university, school or college courses, the proficiency for registration and other vocational purposes of overseas trained teachers and nurses, and the proficiency certification of students and professionals for a variety of other purposes including course entry, course attainment and vocational registration. In addition, occasional testing occurs for other purposes including for purposes related to the law. The ISLPR[®] scale also provides an overall framework of language development within which courses may be developed, goals set and entry and exit levels specified.

The ISLPR[®] scale describes how a second or foreign language develops from zero to native-like proficiency in each of the four macroskills of speaking, listening, reading and writing. Proficiency is defined as the ability to carry out practical language tasks and how those tasks are carried out (i.e., tasks and the form of the language used in carrying out the tasks). It thus provides a highly practical approach to language testing which focuses on real practical ability rather than mere academic knowledge about the language or the ability to handle set itemtypes. Because the scale and its administrative procedures constitute an adaptive approach to language testing, the ISLPR[®] can readily be used with any language and for any purpose whether to measure general proficiency or specific purpose proficiency, i.e. proficiency in a specific register of the language such as, for example, the language of nursing, teaching, engineering or another occupation, the language of a university discipline, or the language used in teaching a specific subject (e.g. a foreign language or some other subject in, for example, an immersion language teaching course).

⁸ ISLPR[®] is a registered trade mark wholly owned by David Ingram and Elaine Wylie.

The ISLPR[®] has been in very widespread use for more than 30 years. It has been formally trialled and its results checked for validity and reliability on several occasions, the results confirming a high level of validity and reliability when used by trained ISLPR[®] testers, monitored and checked by senior assessors. In ILS, for example, tests are checked by a senior tester and, if necessary, re-checked by one of the ISLPR[®]'s authors. It is recognised by most universities in Australia, it is widely known and respected, not only nationally but internationally, it has contributed to the development of other major international tests including IELTS⁹, ACCESS¹⁰ and the ACTFL Guidelines¹¹, it has been challenged and accepted in courts of law in both Australia and the United States, it has, on occasions, been accepted for visa purposes in Australia, and it is used by a variety of vocational registration authorities in both Australia and New Zealand (e.g., for teachers). Most recently, the national taxi industry in Australia has adopted the ISLPR[®] for use in assessing the English proficiency of taxi driver recruits and ISLPR Language Services was contracted to provide advice on the ISLPR[®] standard to be adopted for such recruits.

The standard manner of administration is in a face-to-face interview of individual candidates by trained testers to assess proficiency in speaking, listening and reading while writing is assessed by having candidates carry out at least two writing tasks. The purpose of the test in all macroskills is to elicit the candidate's best language behaviour, which is then matched against very detailed descriptors. The ISLPR[®] scale itself consists of 12 proficiency levels from 0 (zero proficiency) to 5 (native-like) in each of the four macroskills of speaking, listening, reading and writing. Nine of the twelve levels are described in detail, focussing on the language tasks that candidates can carry out and how (i.e., with what language forms) they are carried out. Each descriptor (except 0) in each macroskill occupies an A4 page in 3 columns: General Description, Examples of Specific Tasks, and Comments. Though results are characteristically expressed in the following manner, e.g. S: 2, L: 2+, R: 2, W: 2+, the numbers and the abbreviated titles of each level in each macroskill are merely shorthand for the full, detailed descriptor.

The outcome from using the ISLPR[®] is a profile showing the rating for each macroskill separately, e.g. S: 2, L: 2+, R: 1+, W: 2.

The ISLPR[®] scale itself is available from ISLPR Language Services.

⁹ The present writer was the Australian representative on the joint British-Australian project that developed IELTS in 1987-88 and was Chief Examiner (Australia) and Consultant Examiner in Chief from its release in 1989 until December 1998.

¹⁰ ACCESS was developed in the early 1990s for the Australian Department of Immigration and used internationally for several years to assess the English proficiency of applicants for migration to Australia. David Ingram and Elaine Wylie were advisers to the development project and then were the principal academic managers for three years when Griffith University's Centre for Applied Linguistics and Languages and IDP won the contract for the on-going management of the test after its release.

¹¹ The ACTFL Guidelines were under development at a time in 1981 when David Ingram undertook a lecture tour around the world including the United States. Certain descriptors in the Guidelines, which appeared a couple of years later, bear close resemblance to early ISLPR[®] descriptors that no longer exist.

(ii) SUMMARY TABLE OF THE ISLPR®

The following table provides the number of the 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 (speaking, listening, reading and writing) at each level fills an A4 page in three columns: General Description of Language Behaviour, Examples of Language Behaviour, and Comment. The same key introductory description is used for each macroskill at each level. In the table below, the macroskills are grouped together since the same number, name and key description applies to each of the four. 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,	Basic Social	Able to satisfy basic	In social situations, can

Number	Name	Short Description of Language Behaviour	Examples of how the Language can be used at this Level
R:2, W:2	Proficiency	social needs, and the requirements of routine situations pertinent to own everyday commerce and recreation and to linguistically undemanding 'vocational' fields	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. This is the level required by the Australian Department of Immigration 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	Teacher registration authorities in Australia generally require 4 as the minimum level of proficiency in English for a non-native

Number	Name	Short Description of Language Behaviour	Examples of how the Language can be used at this Level
		and everyday commerce and recreation, and generally in almost all situations pertinent to own 'vocational' fields.	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.
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.

The ISLPR[®] has been trialled, applied and re-developed in a number of different versions authored by Elaine Wylie and the present writer including:

- *The International Second Language Proficiency Ratings - Master General Proficiency Version (English Examples)*. Brisbane: Centre for Applied Linguistics and Languages, Griffith University, 1979/1995/1999/2007. ISBN 0 86857 814 2.
- *The International Second Language Proficiency Ratings - General Proficiency Version for English*. Brisbane: Centre for Applied Linguistics and Languages, Griffith University, 1979/1985/1995/1999/2007. ISBN 0 86857 815 0.
- *The International Second Language Proficiency Ratings - Version for Teachers of Indonesian*. Brisbane: Centre for Applied Linguistics and Languages, Griffith University, 1996. ISBN 0 86857 819 3. Co-author: Geoff Woollams
- *The International Second Language Proficiency Ratings - General Proficiency Version for Indonesian*. Brisbane: Centre for Applied Linguistics and

Languages, Griffith University, 1995. ISBN 0 86857 816 9. Co-author: Geoff Woollams

- *The International Second Language Proficiency Ratings - Version for Second Language Teachers*. Brisbane: Centre for Applied Linguistics and Languages, Griffith University, 1995. ISBN 0 86857 817 7.
- *The International Second Language Proficiency Ratings - English for Business and Commerce Version*. Brisbane: Centre for Applied Linguistics and Languages, Griffith University, 1995. Co-author: Hilda Maclean
- *The International Second Language Proficiency Ratings - English for Engineering Purposes Version*. Brisbane: Centre for Applied Linguistics and Languages, Griffith University, 1995. Co-author: Laura Commins
- *The International Second Language Proficiency Ratings - English for Academic Purposes Version*. Brisbane: Centre for Applied Linguistics and Languages, Griffith University, 1995. Co-author: Catherine Hudson
- *The International Second Language Proficiency Ratings - Version for Japanese*. Brisbane: Centre for Applied Linguistics and Languages, Griffith University, 1994. Co-author: Peter Grainger
- *The International Second Language Proficiency Ratings - Version for French*. Mimeograph. 1981. Co-author: Edwige Coulin
- *The International Second Language Proficiency Ratings - Version for Italian*. Mimeograph. 1981. Co-author: Carlo Zincone
- Various self-assessment versions ranging from very short, simplified versions administered by telephone to computer-based versions, and versions used with language teachers.

The ISLPR® was originally named the Australian Second Language Proficiency Ratings (ASLPR). In 1997, the ASLPR was re-named the International Second Language Proficiency Ratings (ISLPR®) in reflection of its growing international usage and to emphasize its appropriateness to any country, any language, and, not least, any variety of English learned as a second or foreign language.

-oOo- -oOo- -oOo-