

Education and Training Committee, 8 March 2012

English language proficiency

Executive summary and recommendations

Introduction

This paper invites the Committee to agree changes to the current tests / qualifications accepted for the purposes of satisfying the Council's English language requirements. The Registration Departments wishes to reduce the number of tests accepted to two, in order to give greater confidence that all applicants who need to provide evidence of their English language proficiency are able to meet Standard of Proficiency 1b.3.

Decision

The Committee is invited to agree the following:

- To cease (effective from 1 April 2012) accepting the following tests / qualifications:
 - Test of English for International Communication (TOEIC)
 - Cambridge ESOL Certificate of Proficiency in English (CPE)
 - Cambridge ESOL Certificate in Advanced English (CAE)
 - Hong Kong Examinations and Assessment Authority (HKEAA) – Hong Kong Certificate of Education Examinations (HKCEE) Syllabus B Grade A
 - Cambridge IGCSE First Language English – 0522, at grade C or above
 - Cambridge IGCSE Second Language English – 0511, at grade C or above
- To accept (effective from 1 April 2012) only the following tests / qualifications:
 - International English Language Testing System (IELTS)
 - Test of English as a Foreign Language (TOEFL) Internet Based Test (IBT)

The changes have been reviewed by the Solicitor to the Council.

Background information

The last amendments made to English language proficiency tests accepted by HPC, was agreed by the Committee in March 2011

Resource implications

None

Financial implications

None

Appendices

None

Date of paper

27 February 2012

English language proficiency requirements

1. International applicants

- 1.1 Under the Health Professions Order (HPO) Article 12(1) (c) (iii) all applicants who have gained a professional qualification outside of the United Kingdom, must satisfy the Council's prescribed requirements as to knowledge of English except where the applicant is an exempt person.

Schedule 3 of the HPO defines an exempt person as:

- (a) a national of a relevant European State other than the United Kingdom,
- (b) a national of the United Kingdom who is seeking access to, or is pursuing, a relevant profession by virtue of an enforceable Community right; or
- (c) a person who is not a national of a relevant European State but who is, by virtue of an enforceable Community right, entitled to be treated, for the purposes of access to and pursuit of a relevant profession, no less favourably than a national of a relevant European State.

- 1.2 Under the legislation, the HPC is unable to require European Economic Area (EEA) applicants to undergo a language test (except for applicants for speech and language therapy, please see below). Additionally, the HPC is unable to language test other applicants for whom English is their first language.

2. Language testing

- 2.1 The HPC is able to require evidence of language proficiency from international applicants who are not an exempt and for whom English is not their first language.
- 2.2 The HPC currently requires applicants to achieve an overall score in the academic test of the International Language Testing System (IELTS) of at least 7.0, with no element below 6.5, or equivalent. A number of other tests are approved at levels equivalent to the IELTS.
- 2.3 This requirement, however, is higher for speech and language therapists (level 8 with no element below 7.5). The rationale behind this is that communication is a core skill for this profession. As such, for this profession, the Council is able to require both EEA and non-EEA applicants to undergo this test.

3. Existing requirements

- 3.1 The tests previously approved for the purposes of registration are outlined below

Table 1

Language Centre	Speech and language therapists*	All other professions
Cambridge ESOL	Certificate of proficiency in English (CPE)	Certificate in advanced English (CAE)
International English Language Testing System (IELTS)	8.0 with no element below 7.5	7.0 with no element below 6.5
Hong Kong Examinations and Assessment Authority (HKEAA)		Hong Kong Certificate of Education Examinations (HKCEE) Syllabus B Grade A
Test of English as a Foreign Language (TOEFL) – Internet Based Test (IBT)	Minimum score of 118/120	Minimum score of 100/120
Test of English for International Communication (TOEIC)	990	810
Cambridge International Examinations		International General Certificate of Secondary Education (IGCSE) 0522 (1 st Language) Grade C
Cambridge International Examinations		International General Certificate of Secondary Education (IGCSE) 0511 (2 nd Language) Grade C
* Speech and language therapists: this Standard applies to both EEA and International applicants. This requirement is higher for speech and language therapists than for all other professions, as communication in English is a core professional skill (see 1b.3 of the standards of proficiency).		

4. Proposed changes to the existing accepted tests

- 4.1 Having reviewed the tests that the HPC currently accepts, the Executive has identified four changes that need to be made, to ensure that the tests accepted are truly 'equivalent' to the IELTS.
- 4.2 In each case, the changes are required in order to ensure that the tests are consistent with the IELTS test, which is the benchmark for standard of proficiency 1b3. The tests to be accepted will cover comprehension in the following areas of English language proficiency, and that these elements are a compulsory part of the assessment and the final grade achieved:

reading, writing, listening and spoken English. The IELTS test covers these four areas of proficiency.

- 4.3 In order to ensure that HPC is able to adequately monitor the comparability of acceptable tests, we propose to reduce the number of tests accepted to two: IELTS and TOEFL. A number of previously accepted tests are very rarely submitted by applicants and this can lead to difficulties in identifying whether or not the test is acceptable, due to the unfamiliarity of the certificates. Research carried out by members of the Registration Department has also identified a number of discrepancies (detailed below) regarding the mapping of certain tests against the required IELTS standard which may have changed since they were first considered acceptable.
- 4.4 Research regarding tests accepted by the other CHRE health regulators has shown that HPC is currently the only one which accepts any test other than IELTS. The committee has previously accepted other tests in order not to disadvantage any applicant who may not be able to have access to a local IELTS testing centre, however the expansion of both the IELTS and TOEFL networks now mean that one or both of these tests would be available to applicants globally
- 4.5 In order to ensure that all international applicants required to submit evidence of their English language proficiency are of an acceptable level, it is proposed that the following tests are no longer accepted for the following reasons.

Test of English for International Communication (TOEIC)

- 4.6 Concerns have been raised in the following areas.
- It has been brought to our attention that there are two separate versions of this test available to applicants. One test comprises listening and reading elements and the other speaking and writing elements. Therefore, either of these single tests in isolation would not be able to map to an equivalent of the acceptable IELTS level as they do not contain all of the four required elements.
 - There have also been concerns raised regarding the security arrangements at TOEIC test centres (90% of which are in Japan and South Korea), and we have also discovered that TOEIC operate a licencing arrangement whereby third party organisations are able to operate and administer tests on their behalf.
 - This has also raised concerns over the potential for fraudulent applications. In the past six months there have been two examples of this test having been submitted

Hong Kong Examinations and Assessment Authority (HKEAA)

- 4.7 Although there is some evidence of comparability to IELTS, it is not comparable for the higher level required by Speech and Language Therapists. This test has been submitted extremely infrequently. In the

past six months there have been no examples of this test having been submitted.

Cambridge ESOL Certificate in Advanced English/Certificate of Proficiency in English

- 4.8 These tests can be mapped as being comparable to IELTS both at level 7 (CAE) and level 8 (CPE). In the past six months there have been no examples of this test having been submitted. Given this lack of frequency, we see no reason for continuing to offer these tests.

Cambridge International Examinations

- 4.9 The following qualifications are currently accepted:

International General Certificate of Secondary Education (IGCSE) **0522** (1st Language) Grade C/International General Certificate of Secondary Education (IGCSE) **0511** (2nd Language) Grade

Although these tests were approved by the committee in 2011, there have been no examples of this test having been submitted. Given this lack of frequency, we see no reason for continuing to offer these tests

- 4.10 In order to ensure that all international applicants required to submit evidence of their English language proficiency are of an acceptable level, it is proposed that only the following tests are accepted:

International English Language Testing System (IELTS)

- 4.11 This is the test that provides the benchmark for HPC's standards of proficiency. It is available in over 800 test centres worldwide and benefits from tight security procedures at test centres to ensure candidates are genuine.

All tests can be verified as genuine using the IELTS website and the Registration Department has developed contacts with IELTS stakeholder relations managers who are able to assist us with any queries we may have regarding tests. In the past six months there have been 23 examples of this test having been submitted.

Test of English as a Foreign Language (TOEFL) Internet Based Test (IBT)

- 4.12 This test provides the closest mapping to IELTS of all other language tests, and this has been previously presented to, and accepted by the Committee. Tests can be taken at 4,500 test centres in 165 countries. The Registration Department is confident that any applicant would have straightforward access to either this or the IELTS test wherever they are in the world. TOEFL maintain high standards of security at their testing centres and test scores can be verified online. In the past six months there have been five examples of this test having been submitted.

5. Decision

5.1 The Committee is invited to agree the revised list of tests / qualifications set out in table 2 below as satisfying the Council's English proficiency requirements at entry to the Register.

5.2 In summary, the changes are:

- To cease (effective from 1 April 2012) accepting the following tests / qualifications:
 - Test of English for International Communication (TOEIC)
 - Cambridge ESOL Certificate of Proficiency in English (CPE)
 - Cambridge ESOL Certificate in Advanced English (CAE)
 - Hong Kong Examinations and Assessment Authority (HKEAA) – Hong Kong Certificate of Education Examinations (HKCEE) Syllabus B Grade A
 - Cambridge IGCSE First Language English – 0522, at grade C or above
 - Cambridge IGCSE Second Language English – 0511, at grade C or above
- To accept only the following tests / qualifications:
 - International English Language Testing System (IELTS)
 - Test of English as a Foreign Language (TOEFL) Internet Based Test (IBT)

Table 2

Language Centre	Speech and language therapists*	All other professions
International English Language Testing System (IELTS)	8.0 with no element below 7.5	7.0 with no element below 6.5
Test of English as a Foreign Language (TOEFL) – Internet Based Test (IBT)	Minimum score of 118/120	Minimum score of 100/120
* Speech and language therapists: this Standard applies to both EEA and International applicants. This requirement is higher for speech and language therapists than for all other professions, as communication in English is a core professional skill (see 1b.3 of the standards of proficiency).		

5.3 In order to ensure that applicants are not unfairly disadvantaged, the

Committee is invited to agree the changes to the accepted tests effective from 1 April 2012. If an applicant commenced one of the tests previously accepted prior to this date, these qualifications will continue to be accepted, providing that they meet standard of proficiency 1b3.