

**Health Professions Council
Standards of proficiency for Applied Psychologists
Professional Liaison Group (PLG)
25 October 2007**

**Applied Psychologists – International English Language Testing
System (IELTS) requirements**

Executive Summary and Recommendations

Introduction

At its meeting on 4 September 2007, the PLG considered a paper regarding the English language requirements for entry to the applied psychologists part of the Register.

The attached paper has been updated from the paper considered at the meeting, and includes a summary of comments made about this issue.

Decision

The group is invited to discuss the attached paper and make recommendations.

Background information

None

Resource implications

None

Financial implications

None

Appendices

None

Date of paper

19 October 2007

Applied Psychologists – International English Language Testing System (IELTS)

Introduction

This paper looks briefly at requirements amongst the existing professions for English language competence, and invites discussion on appropriate requirements for the applied psychologists' part of the Register.

Mutual recognition rights and language testing

Under European legislation, applications from applicants with 'mutual recognition' rights are treated differently compared to those from applicants from outside of the European Economic Area (EEA).

In order to obtain mutual recognition rights, an applicant has to be a national of a country within the EEA and have the right to practise in an EEA country. We assess the applications of such applicants in the same way as other applications. However, if we find that there is a shortfall between the applicant's education and experience and the standards required for registration, we are able to ask them to undertake a 'period of adaptation' to make up this shortfall. A period of adaptation is a period of supervised practice and/or academic training which allows an EEA applicant to reach the standard required to be registered with us.

Under the legislation, HPC is unable to require EEA applicants exercising mutual recognition rights to undergo a language test (except for applicants for speech and language therapy, please see below). Additionally, HPC is unable to language test other applicants for whom English is their first language

Language testing

HPC is able to require evidence of language proficiency from international applicants who do not have mutual recognition rights under European Legislation and for whom English is not their first language.

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. A number of other tests are also approved at levels equivalent to the IELTS.

This requirement, however, is higher for speech and language therapists. The rationale behind this is that communication is a core professional 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.

The standards of proficiency and language testing

HPC's requirements for English language proficiency are included in the standards of proficiency:

For speech and language therapists

2b.4 (Profession-specific)

- be able, as a core professional skill for speech and language therapists, to communicate in English to the standard equivalent to level 8 of the International English Language Testing System, with no element below 7.5

For all other professions

1b.4 (Generic)

- be able to communicate in English to the standard equivalent to level 7 of the International English Language Testing System with no element below 6.5

English language requirements of other regulators

The following is a sample of the English language testing requirements of other regulatory bodies.

N.B: The test scores given below all relate to the academic rather than the general IELTS test.

- **Pharmacists:** The Royal Pharmaceutical Society of Great Britain (RPSGB) requires a minimum score of 7 in each part of the parts of IETLS.
- **Doctors:** The General Medical Council (GMC) requires 7.0 as an overall score on the IELTS test, a minimum score of 7.0 in the speaking section and 6.0 in each of the other sections (listening, academic reading and academic writing).
- **Dentists:** The General Dental Council (GDC) requires an overall score of at least 7.0, with no section below 6.5.
- **Nurses:** The Nursing and Midwifery Council (NMC) requires an overall score of at least 7.0 with at least 7.0 in the writing and speaking sections.

Applied Psychologists – proposals in 2005

In the Department of Health (England and Wales) consultation document of 2005, the Department said:

“Applicants outside the EEA will need to supply an International English Language Testing System (IELTS) certificate where English is not the first language. The HPC currently requires an IELTS score of 7 for most of its applicant registrants. Level 8 is

required for speech and language therapists and it is proposed that this would also be required for applied psychologists.”¹

In its response to the consultation, HPC said:

“The HPC does not agree that the Test of English for non-EEA Applied Psychologist applicants should be IELTS level 8 or its equivalent. It is the view of the Council that it should be 7.0, the same level as for other HPC regulated professions. The only profession which currently requires a higher level of English proficiency is speech and language therapy, for which the English language is a core professional skill.”²

In their response to the consultation, the British Psychological Society (BPS) said:

“With respect to English language proficiency we agree that Level 8 is required for applied psychologists. We were both amazed and concerned to see the HPC has proposed Level 7 in its response. We consider this indicates a very worrying lack of appreciation of the work of applied psychologists where verbal communication, and its subtleties, are absolutely central to practice.”³

English language competence and the role of employers

It is important to remember that any English language requirements, as with the rest of the standards of proficiency, are set a threshold level. Further, as outlined in this paper, HPC’s ability to language test applicants is limited to those for whom English is not their first language and who do not meet the criteria for mutual recognition.

Therefore, registration cannot be a guarantee of English language competence. Nor can it be a guarantee that a registrant will be suited to a particular employment role. Employers also have responsibilities in ensuring that they employ registrants who are fit for purpose, including assuring themselves that the registrant possesses an appropriate ability in the English language.

Summary of discussions at and since the last meeting

At its meeting on 4 September 2007, the group had some initial discussion around appropriate requirements for English language competence. The Group concluded that whilst it may not be appropriate to consider a general case for IELTS requirements at level 8, it might consider the issue on a discipline specific basis to reach a clear rationale as to the necessary levels.

¹ Department of Health, Applied Psychology: Enhancing public protection: Proposals for the statutory regulation of applied psychologists (March, 2005), p.17.

http://www.dh.gov.uk/Consultations/ClosedConsultationsArticle/fs/en?CONTENT_ID=4112787&chk=3FLGIU

² Health Professions Council, Response to ‘Applied Psychology: Enhancing public protection: Proposals for the statutory regulation of applied psychologists’ (June 2005), p.10.

http://www.hpc-uk.org/assets/documents/100007B4Consultation_Applied_Psychology_HPC_response.pdf

³ British Psychological Society, Response of the British Psychological Society to ‘Applied Psychology: Enhancing Public Protection: Proposals for the Statutory Regulation of Applied Psychologists’ (June 2005), p.10.

[http://www.bps.org.uk/document-download-area/document-download\\$.cfm?file_uuid=56265DB2-1143-DFD0-7E39-39D2334B8AD0&ext=pdf](http://www.bps.org.uk/document-download-area/document-download$.cfm?file_uuid=56265DB2-1143-DFD0-7E39-39D2334B8AD0&ext=pdf)

A small number of comments have been received by email after the meeting from PLG members and from the small email reference group who have been receiving email links to the papers.

Amongst those comments, it has been argued that the requirements should be set at level 8 for clinical psychologists. One comment said that level 8 was required for clinical psychologists because they would be expected to assess higher language functioning and that, since psychological assessments and therapy are primarily conducted solely via verbal communication, it was essential that their ability to practise safely and effectively was not hindered by the level of their English language ability. It was further argued that there was a strong case that this should be same for educational psychologists.

The drafts from the BPS (included as a paper to note in the papers for today's meeting) outline a proposed requirement of level 8 for all disciplines.

Conclusions

The PLG is invited to discuss the appropriate level of language proficiency requirements for each of the applied psychology disciplines and to make recommendations.

The group is requested to provide a clear rationale as to why the level they recommend is necessary.