The ALAA (Applied Linguistics Association of Australia) welcomes the opportunity to submit our views on the proposal *Strengthening the test for Australian citizenship*.

The ALAA is the national organisation for applied linguistics in Australia. We provide leadership in promoting and recognising excellence in applied linguistics practice and research, and in contributing to national debates and policy discussions with regard to language related concerns. The discussion paper *Strengthening the test for Australian citizenship* proposes significant changes to the requirements to become an Australian citizen. ALAA’s submission will focus on the proposed introduction of an English language test in the context of new measures for ensuring “allegiance” and “integration” into Australian society.

The discussion paper calls for improved measures to ensure that aspiring citizens demonstrate their “allegiance to Australia”; their commitment to live in accordance with “Australian values”; and their willingness and ability to interact with, and become contributing members of, the “Australian community”.

The discussion paper locates the need for the proposed changes in the context of recent terrorist attacks, claiming that “in the face of these threats, there is no better time to reaffirm our steadfast commitment to democracy, opportunity and our shared values” (p. 5). The implication is a link between those who seek to become citizens and those who may commit terrorist acts. If this implication is warranted, then the evidence should be cited; if it is not, it should be retracted as inaccurate, unjust and potentially divisive.

Moreover, it is deeply concerning that these changes are being proposed without consultation with language and language testing specialists – a concern raised by Senator Kim Carr in a senate hearing\(^1\).

Specifically, we find the new language requirement problematic for the following reasons:

Firstly, Under the proposed legislation and outlined in subsequent statements, applicants for Australian citizenship will be required to achieve an equivalent to Band 6 proficiency on the International English Language Testing System (IELTS).

Designed as a four-part test that assesses, respectively, speaking, listening, reading and writing, the IELTS test is currently taken as a requirement for certain visa immigration categories. There is no current test designed to assess the diverse kinds and uses of English that applicants may need as Australian citizens. Indeed, it is not clear how a single test could capture this diversity.

Secondly, the proposed changes are out of line with international practice in language testing associated with citizenship. While much of Europe requires a language proficiency test as part of citizenship (McNamara 2009), the highest that any country requires is B2 of CEFR (Common European Framework of Reference) – which is lower than IELTS 6\(^2\). For the UK the level required for citizenship is B1, equivalent to IELTS Band 4.5. NZ requires English levels of between Band 5 and Band 6.5 for a range of visa sub-classes\(^3\), but only requires immigrants to be able to “hold a basic conversation in English” at appointment to apply for citizenship\(^4\). The US naturalisation test sets a comparable bar for passing – applicants must simply read and write one out of three simple sentences correctly (using vocabulary and study materials provided in advance\(^5\). It is thus in no way appropriate to claim that the requirements being pursued here are in line with what is done in other countries around the world. IELTS Band 6 is significantly higher than the international benchmark and at no point has evidence been provided for setting the level at this point. We thus call on the government to reconsider this benchmark and to consult with experts in the field of language testing when making policy of this nature. We would be happy to facilitate access to such experts.

Moreover, a level of proficiency equivalent to Band 6 would involve a focus on language for purposes that would in all likelihood be unfamiliar to and challenging for many ‘native speakers’ of Australian English and would not include provision for the varieties of Australian English that are found among the general population of citizens.

Meeting any such requirement requires highly specific skills in addition to the language skills that test is designed to assess. The upshot is that the score a candidate for a test such as IELTS receives reflects their knowledge of the test and their ability to perform under test-specific conditions. These ‘technique and composure skills’ are inseparable from and inevitably influence scores for English language performance. It is not clear how applicants would or could acquire these skills. Moreover, and crucially, these test-specific skills are not expected of or required by citizens in the general population.

Furthermore, this is a requirement which native English speakers are not assured of achieving if they have had limited education or are not for other reasons familiar with the requirements of academic/formal uses of English. We note that IELTS and was

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\(^2\) See https://www.ielts.org/ielts-for-organisations/common-european-framework


\(^4\) See https://www.govt.nz/browse/nz-passports-and-citizenship/getting-nz-citizenship/apply-for-nz-citizenship/language-requirements

\(^5\) See https://www.uscis.gov/citizenship/learners/study-test/study-materials-english-test
never designed for this intended purpose. Band 6 is higher than the requirement for entry to some university courses in Australia.

Allied to the inappropriate focus and skills assessed, the use of a language test and citizenship test will discriminate against certain groups, in particular humanitarian entrants, and refugees who have experienced trauma or other barriers to learning and performing during the test, and/or who have low levels of education/literacy. King (2017) shows that even after a year or more of full-time specialist schooling adolescents who have had severely interrupted schooling prior to migration struggle to read and write the most basic English texts (i.e. Primary school Foundation Year level). There is strong evidence that literacy is a skill that is extremely difficult to master in adulthood if it has not been established in childhood. Therefore, we argue that any proposed changes to citizenship requirements must make alternative accommodations for low-literate adults if it is to be in any way equitable.

The problem of discrimination is compounded by the culturally specific materials that are inevitably used in language tests. These are in no sense ‘generically English’. Indeed, no such focus would be possible in a language test. Language tests are necessarily highly selective in the cultural knowledge that they assume for candidates. In the IELTS test, for example, these assumptions require close familiarity with and practice in ways of life that would do not reflect the lives of many of the general population of citizens.

More generally, uses of test scores as proxies for general proficiency and indicators of allegiance are problematic – someone can score poorly while still having appropriate skills for their day-to-day life context. Equally, someone may have the opportunity to be closely prepared in test techniques and get a reasonable score while having great difficulty in communicating in everyday English and integrating into the Australian community. The challenges migrants encounter when communicating or integrating often have little to do with the sorts of skills that could be measured in language or citizenship tests. Rather they stem from unfamiliarity with the particular linguistic and cultural environment in which they live and work. In Australia, the point hardly needs to be made that this varies widely across the country, among the native speaker population just as it does among those whose first languages are not English.

Furthermore, the inclusion of ‘values’ and ‘commitment to shared values’ warrants scrutiny. It is unclear as to how such values are to be identified and how they might be represented in a test of this kind. That is, it would require determining a testable construct for ‘commitment’ which would be highly fraught and potentially problematic in terms of how binding answers might be. There is no sense at this point of what the consequences might be in relation to determining one’s ‘commitment’. Does it mean, for example, that citizenship rights may be compromised or even retracted if this commitment is perceived to have been broken? What is the process for deciding what ‘shared values’ are? Who will determine these and on the basis of what? With the increased duration to four years of residency prior to application for citizenship, is it the intention to make greater/longer term assistance available to potential applicants such that the higher demands can be suitably met? These matters remain unclear at this point and require much consideration and expert advice if they are to be pursued and included in a citizenship test.
Finally, there is the issue of equity. Citizenship is given automatically to the majority of people who already reside in Australia. Any program that places a language test requirement on one group of residents that ignores the linguistic and cultural skills and knowledge of existing citizens, discriminates against the most vulnerable applicants. This distorts the meaning of what it means to be an Australian citizen. In other words, it threatens the sense of fair mindedness and belonging that this proposal is so keen to cultivate. The new measures would draw boundaries between some ‘us’ and some ‘them’, sending the message that people who do not achieve a particular language and cultural knowledge test score are less worthy of being citizens. There is also a total undervaluing of the knowledges that these people bring. No testing scheme considers the ‘value added’ by the languages, cultures, knowledges and know-how that these people bring.

This submission was prepared by the ALAA Executive.

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