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**Sent:** Friday, 22 November 2013 10:17 PM  
**To:** Standard Consultation  
**Subject:** 'Consultation - registration standards'

The response to the proposed questions is based on my experience as a migrant to Australia:

1. From your perspective, how is the current registration standard working?

The current registration standard is biased. While it allows some applicants access, it denies others. The registration should be applied to all applicants regardless of citizenship status or country of origin.

2. Should the countries recognised in the standard be consistent with those countries recognised by the Department of Immigration and Citizenship for exemptions from English language testing?

No, the department of immigrant is not APHRA. APHRA should design and implement their own English language testing standards and testing system. APHRA can work with the expertise of local universities to design and implement English tests which would reflect Australian culture and cater for Australian studies. This English testing system should be applied to all applicants regardless of country of origin and citizenship status.

Based on my experience sitting for IELTS, although I had spent a considerable amount of time studying about Australian politics, social and economic issues; the questions I encountered during my oral test required me to talk about photography in my country of origin. In the reading section, one of the three questions pertained to the economy of Holland. When I sat for IELTS in 2011, I had already been living in Australia for over 10 years and a citizen of Australia for 6 of those years. It concerned me that the questions posed were still directed to my country of origin and not relevant to my life in Australia.

If so, should the recognition of South Africa in the National Boards' English language skills registration standard be phased out over time?

The National Boards English language skills registration should require all individual registering for APHRA to sit for an English language test conducted by a local university regardless of citizenship status or country of origin.

3. Is there any evidence to assist National Boards to assess whether there are any additional countries that should be recognised in their English language skills registration standard?

The National Boards should assess the English language skills of the current Australian high school leavers to determine the standard of English in Australia and benchmark this against the English language skills from other countries.

4. Do you have comments about how the National Boards should approach test results that are very close to, but slightly below, the current standard?

The National Board should determine the acceptable English level based on their requirement and should not compromise the standards.

5. Should National Boards accept results from more than one sitting or is there a better way to address this issue, such as the approaches described above? The current IELTS is expensive and diligent students will ensure they pass the test in one sitting. However, the test should not roll over for 2 hours and 40 minutes in one go. Rather, it would be appropriate for a test to be structured to allow students rest time between the reading and writing to give them a brain break and toilet break.

In my experience, after the listening test, I had enough time to sharpen my pencil and be ready for the reading and writing exam. I could not have a toilet break and had to hold my bladder as I knew I would not have enough time to finish the exam on time.

6. Is the content of the draft revised registration standard helpful, clear, relevant and more workable than the current standard?

I believe there is room for improvement. Rather than having IDP set the exam, it would be appropriate for Australian universities to take a dominant role in getting involved in setting the exam and the English language standard. After all, the students will be studying in Australian universities; hence they should be prepared to immerse themselves in the Australian language.

7. Is there any content that needs to be changed or deleted in the revised draft registration standard?

The English language test should not have a valid date. After all, if a student has passed the test once why should the student be required to resit the test again.

8. Is there anything missing that needs to be added to the revised draft registration standard?

A new English language testing system, managed and run by an Australian university which requires that all applicants regardless of citizenship and country of origin to sit for this test and demonstrate their level of English language proficiency.

9. Do you have any other comments on the revised registration draft standard?

APHRA has been dependent on English testing standards from UK and USA. It is about time that APHRA institutes an independent body based in a local university which can establish an English language testing system reflecting the Australian culture and embodies the Australian education and style of learning.

Kind regards

Gurmeet Albail Singh

