University of Sydney

Human Trafficking Criminal

University of Sydney: Australia’s most corrupt and racist degree-factory.

How Australia's public universities scam billions of dollars from international students from India and China via global IELTS exam fraud, extortion and human trafficking crimes.

Global Lawsuit Consultation Communiqué

www.ielts.agency

April 2018
Michael Spence

University of Sydney

Re: Crimes against Humanity – IELTS Human Trafficking

Michael Spence,

This letter protests crimes against humanity which you and your Executive have perpetrated against citizens of Asia and other regions over the past decade. As shown on pages 64 and 65 of this report, your criminal prostitute is the global public face of IELTS’s human trafficking crimes.

My independent scholarly research that examines the International English Language Testing System (IELTS) concludes that the University of Sydney is a Chief Architect of a ruthless global scam that willfully and persistently enforces modern-day slavery on a grand scale. Your university uses linguistic imperialism, *i.e.* the IELTS test, to perpetrate systemic exam fraud, racketeering and extortion crimes to accumulate massive economic gains. Vulnerable young citizens of developing nations account for the bulk of the victims of these heinous crimes.

I am deeply ashamed to be a double graduate of Australia’s most corrupt and racist university.

J Jericho
IELTS Human Trafficking Example: Short Term Modern Slavery

One IELTS test costs circa AUD$300

One IELTS test costs a Filipino nurse circa one month’s salary.  
(e.g. Graham quoted in The Irish News, 2017)

IELTS profile the nurse’s application and estimate s/he will fund 10 tests.

University of Cambridge design subjective assessments for speaking and writing.

IELTS award fake fail scores of 6.5 for writing and speaking for the first 9 tests.

Nurse works ten months to fund IELTS’s ambitious annual profit target.

This cycle repeats for circa 100,000 IELTS test takers per annum.

Global IELTS fraud funds circa 7,000 parasitic beneficiaries (e.g. Examiners)

IELTS award criminal executives massive annual performance bonuses.

IDP chief Andrew Barkla’s $14m pay cheque draws flak

Source: The Australian newspaper (24 October 2016)
IELTS Human Trafficking Crime Example: Lifelong Modern Slavery

One IELTS test costs circa AUD$300

IELTS test costs a Filipino nurse circa one month’s salary.

Nurse takes out a 30 year loan in pesos to fund a Nursing Master Degree in Canada.

IELTS Canada secretly decide this older nurse graduate is unsuitable for migration to Canada.

University of Cambridge design subjective assessments for speaking and writing.

IELTS Canada award fake fail scores of 6.5 for writing for 21 tests (see page 93)

Nurse abandons IELTS and migration plans and returns home to pay student loans.

Fake 6.5 fail score cycle repeats for circa 100,000 IELTS fraud victims per annum.

Global IELTS fraud funds circa 7,000 white-collar parasites (e.g. exam designers)

IELTS dividends fund generous salaries of human trafficking criminals

News article source: Australian Broadcasting Corporation (2018)
Executive Summary

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</tbody>
</table>

Acronyms

AASW Australian Association of Social Workers
CELP IP Canadian English Language Proficiency Index Program
IELTS International English Language Testing System
UAE United Arab Emirates
UN United Nations
OECD Organisation for Economic Co-operation and Development

Contact: jay@educate.institute

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Digital version available at www.ielts.agency and www.educate.institute
International Court of Justice: IELTS

Canada, Australia and Australia’s public universities (IDP Education) have a case to answer before the ICJ at the Hague.

Crimes against Humanity: Human trafficking; modern day slavery; transnational fraud, racketeering and extortion.

I am interested to hear from human rights lawyers, current and former IELTS / IDP staff, IELTS clients and other stakeholders.

Please contact Dr. J Jericho in confidence for further details.

jay@educate.institute  www.educate.institute  October 2017

<table>
<thead>
<tr>
<th>Bandscore</th>
<th>Skill level</th>
</tr>
</thead>
<tbody>
<tr>
<td>Band 9</td>
<td>Expert user</td>
</tr>
<tr>
<td>Band 8</td>
<td>Very good user</td>
</tr>
<tr>
<td>Band 7</td>
<td>Good user</td>
</tr>
<tr>
<td>Band 6</td>
<td>Competent user</td>
</tr>
<tr>
<td>Band 5</td>
<td>Modest user</td>
</tr>
<tr>
<td>Band 4</td>
<td>Limited user</td>
</tr>
<tr>
<td>Band 3</td>
<td>Extremely limited user</td>
</tr>
<tr>
<td>Band 2</td>
<td>Intermittent user</td>
</tr>
<tr>
<td>Band 1</td>
<td>Non-user</td>
</tr>
<tr>
<td>Band 0</td>
<td>Did not attempt the test</td>
</tr>
</tbody>
</table>

IELTS Band Score System: British Council (2017j)
Executive Summary

The first goal of this research project exposes the pervasive pedagogical design flaws that are inherent in the Academic and General versions of the International English Language Testing System (IELTS) exam. The second objective demonstrates how the business practices of the IELTS consortium are negligent, unethical and unjust. The third purpose shows how members of the IELTS consortium violate domestic and international law on a massive global scale. They do so to accrue maximum economic gains from exam fraud, racketeering and extortion crimes.

Designing assessments is rarely an easy task. No English language test design can achieve perfection or fully satisfy all stakeholders. The corrupt business practices and negligent designs that underpins the IELTS exam are not accidental or unavoidable. They are cruel, willful scams.

History shows humanity that sinister regimes puppeteer a destructive apparatus to perpetrate heinous human rights atrocities. The University of Cambridge is the sole designer of IELTS exam content. It is the mastermind creator of IELTS’s secretive assessment rubrics and its price-gouging, politically-motivated phony assessment procedures. The University of Cambridge is the Chief Architect and principal enforcer of imperial modern slavery and human trafficking crimes.

Table 1, overleaf, summarizes the core findings that are analyzed in the body and appendices of this report. I respectfully invite constructive feedback from members of our global community.
<table>
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<th>Allegation: Pedagogical content</th>
<th>Fact / Opinion</th>
<th>Finding</th>
<th>Section references</th>
</tr>
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<tbody>
<tr>
<td>Assessments contain obvious errors.</td>
<td>Fact</td>
<td>Confirmed</td>
<td>Chapter 4.1; 4.3</td>
</tr>
<tr>
<td>Assessment rubrics are secretive.</td>
<td>Fact</td>
<td>Confirmed</td>
<td>Appendix 2.</td>
</tr>
<tr>
<td>Assessment rubrics are subjective.</td>
<td>Fact</td>
<td>Confirmed</td>
<td></td>
</tr>
<tr>
<td>Assessment rubrics are vague.</td>
<td>Opinion</td>
<td>Agree</td>
<td>Appendix 2</td>
</tr>
<tr>
<td>Assessment rubrics are confusing.</td>
<td>Opinion</td>
<td>Agree</td>
<td></td>
</tr>
<tr>
<td>Exam content lacks authenticity.</td>
<td>Opinion</td>
<td>Agree</td>
<td></td>
</tr>
<tr>
<td>Western-centric hidden <em>curriculum</em>.</td>
<td>Opinion</td>
<td>Agree</td>
<td>Appendix 2.</td>
</tr>
</tbody>
</table>

| Allegation: Business practices                                                                       |                |          |                                     |
|------------------------------------------------------------------------------------------------    |                |          |                                     |
| Exam processes are not transparent.                                                                | Fact           | Confirmed | Chapter 4.1                         |
| Test-takers must waive their civil right to litigate as a condition of registration.             | Fact           | Confirmed | Chapter 3.1                         |
| May award scores of zero and cancel Test Report Forms without refund if a test-taker is merely suspected of cheating. | Fact           | Confirmed | Chapter 4.4                         |
| Has regional monopoly English testing status in 139 nations (Canadian migrants).                 | Fact           | Confirmed | Chapter 1.10, 4.4                   |
| Appeals process is not accessible to those who cannot afford the fee.                            | Fact           | Confirmed | Chapter 4.5                         |
| Application form collects vast amounts of irrelevant private demographic data.                  | Fact           | Confirmed |                                     |
| Examiners use demographic profiling.                                                              |                |          |                                     |
| Exam content deliberately sets many/most test-takers up to fail to maximize profits.          | Opinion        | Agree     |                                     |
| IELTS’s covert dual purpose aims to cull/slow migration to Canada/Australia.                   |                |          |                                     |
| Appeals process is a profiteering racket.                                                       |                |          |                                     |
| Appeals process is extortionate.                                                                 |                |          |                                     |
| Expiry date of results is extortionate.                                                          |                |          |                                     |
| Poor customer service.                                                                          | Opinion        | Agree     | Chapter 4.5                         |
| Has infiltrated/corrupted stakeholders.                                                          | Opinion        | Agree     | Chapter 1.10                        |
| Uses deceptive marketing propaganda.                                                              | Opinion        | Agree     |                                     |
| Staff deliberately intimidate test-takers.                                                       | Opinion        | Unconfirmed |                                     |
| Exam fraud targets non-white persons.                                                            | Opinion        | Unconfirmed |                                     |
Part 1       Introduction

1.1       Objective

This report pursues three objectives. The first goal aims to provide a fair and constructive critique of the pedagogical design of the Academic and General versions of the International English Language Testing System (IELTS) exam. The second objective evaluates whether the business practices of the IELTS consortium are ethical and fair. The third purpose examines whether the IELTS consortium willfully and persistently violate domestic and international law on a massive global scale to accrue maximum economic gain from fraud, racketeering and extortion crimes.

The scope of this review excludes an evaluation of the business practices of official IELTS business partners such as colleges and universities who manage IELTS test centers as profit-maximization ventures. IELTS’s business partners are required to conform to numerous strict terms and conditions of their service contract as defined by the IELTS consortium. The market power of any one college or university that administers an IELTS test center is dwarfed by the colossal political and economic collective global power of the IELTS consortium. It is fair to assume that corrupt business practices that occur at IELTS’s outposts mirror policy directives of the IELTS syndicate.
Research Communique Series

This research report summarizes and further develops eleven IELTS research reports (Research Communique Series) authored and published by Dr. J Jericho during 2017.

These Research Communiques are annexed in the appendices section of this report. Table 2 is an inventory of this research.

Table 2
IELTS Research: Research Communique Series

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<td>Estimating the profits that IELTS earns from its academic appeals process.</td>
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</tbody>
</table>


Digital copies of these Research Communiques are available at the web addresses shown under Table 2.
TOEFL and Pearson

TOEFL and Pearson are the main competitors of IELTS in the global market for English language testing services for migration, education and professional registration purposes. Part 1 of this research series does not compare the pedagogical content of IELTS against Pearson and TOEFL. It does offer some comparisons with these agencies’ assessment outcomes and administration policies. I have been employed as a university teacher in Australia and New Zealand since 2007. During this period, I do not recall any people complaining to me about the administration and design of Pearson or TOEFL. This contrasts to complaints that I have received from circa 60 students, face-to-face about the IELTS test. I have also received dozens of complaints about IELTS (only) via other mediums such as e-mail and online discussion forums.

I conclude that all English language tests have multiple design flaws. However, the main global problem with IELTS lies in the way that they deliberately exploit their administration processes and exam design flaws to appease corrupt government clients and to maximize profits. I estimate that around 99% of all complaints about English language tests that exist in the public domain are targeted towards IELTS. At this stage of my research, I do not feel the need to extend the length of this document by offering an extended comparison of IELTS with other language tests.

Those who want to compare IELTS exam content with Pearson and TOEFL may conduct their own comparative analysis. Open-access (free) official exam preparation resources for TOEFL (2017) and Pearson (2017a) are available via both agencies’ websites at the links shown in references section of this document.
1.2 Test format

The IELTS exam has two options: IELTS General and IELTS Academic. The listening and speaking format and content are identical for the IELTS General and IELTS Academic tests. Figure 1 summarizes the format of IELTS’s General and Academic tests.

Figure 1

IELTS Test Format: General and Academic -

Source British Council (2017a)
The spirit of IELTS’s General examination package poses questions that focus on routine, day-to-day functions in the workplace and social settings. Examples of these tasks include writing a letter to a neighbor (i.e. General writing test) and reading and comprehending content from newspapers such as job advertisements (i.e. General reading test).

The intent of the IELTS Academic test centers on typical scenarios that confront post-secondary education students and scholars such as academic researchers. The Academic test requires candidates to descriptively analyze one or more diagrams, models or images for writing task 1. Test-takers are requested to argue the point about their opinion that concerns a topic from a range of sub-disciplines such as moral philosophy and political sociology for writing task 2. The academic reading section requires candidates to analyze and interpret textual content and images/diagrams from scholarly sources such as peer-reviewed journal articles and research papers.

1.3 High-stakes

IELTS is a ‘high-stakes’ global English language test. IELTS acknowledge this fact in multiple sources such as their marketing brochures and website content. For example, I refer to the extract shown in Figure 2, overleaf, downloaded from IELTS’s official website dated 17 November 2017.
The majority of IELTS’s clients comprise one or more of the following demographic groups:

- Skilled migrants
- Unskilled foreign workers
- International students
- Individuals who are required to register with a foreign professional body.

Criminal and negligent acts committed by IELTS executives and staff can and do have devastating impacts on test-takers and their families, dependents, sponsors and their community-at-large (e.g. Suss, 2011). Members of the IELTS consortium have a serious duty of care to act in a manner that is professional, ethical and transparent at all stages of their global business operations.

1.4 Historical context

The IELTS exam was established in 1989 (Ingram, 2014). The IELTS was never intended to be used as a tool to support immigration agencies. The IELTS test was designed to support applicants who
speak English as a foreign language and aim to study at a post-secondary education institute where the sole or dominant language of instruction occurs via the English language.

IELTS was not designed as, and is not, a test of vocational English proficiency. Rather, it was designed specifically to assess the English of students intending to enter English-speaking universities or training programmes.

Professor David Ingram (2014); Co-designer and creator of the IELTS exam.

The IELTS consortium comprises three business partners: IDP Education Limited Liability Corporation (Australia), University of Cambridge (Cambridge Assessment Group) and the British Council. IDP Education is an Australian corporation. The University of Cambridge and the British Council are public British Institutions.

Australia and Britain are historical colonial powers and are members of the Commonwealth of nations, formerly known as the British Commonwealth. Australia’s Indigenous population has never been granted sovereignty status in any Australian territory since Britain’s Armed Forces established settler colonies in Australia in 1788 (Prokhovnik, 2015). Britain’s colonial administration of colonies and protectorate nations in modern day India, Pakistan, Egypt and Palestine over the past century is widely documented by respected historians (e.g. Louis, 2006).

Most clients who sit the IELTS exam aim to secure a student visa, skilled work visa or a permanent residency visa for Australia, New Zealand, Britain or Canada. These nations are members of the Organisation for Economic Co-operation and Development (OECD) and they possess developed
capitalist economies. Most of these test-takers are therefore classifiable as ‘economic migrants’. The United Nations (2017c) recognizes that migrants are a vulnerable demographic that are not always afforded the same rights and protections that a host government bestows on its citizens.

It is highly likely that the vast bulk of IELTS’s fee-paying clients are citizens of ‘developing economies’ or ‘economies in transition’ as defined by the United Nations (United Nations, 2016, p. 160). IELTS (2017i, NP) reports aggregate “country of origin” test data for citizens of 40 selected nations for test-takers during 2015. These nations are:

- Bangladesh, Brazil, Canada, China (People's Republic of), Colombia, Egypt, France, Germany, Greece, Hong Kong, India, Indonesia, Iran, Islamic Republic of, Iraq, Italy, Japan, Jordan, Kazakhstan, Korea, Republic of Kuwait, Malaysia, Mexico, Nepal, Nigeria, Oman, Pakistan, Philippines, Qatar, Russian Federation, Saudi Arabia, Spain, Sri Lanka, Taiwan, Thailand, Turkey, Ukraine, United Arab Emirates, United Kingdom, Uzbekistan, Vietnam.

Current data for performance by country for 2016 has not yet been published by IELTS.

1.5 Business model

Members of the IELTS consortium share the multimillion dollar profits and financial surpluses earned from IELTS exams and the sale of IELTS’s services and merchandise. Table 3 summarizes the legal structure of the three entities that comprise the IELTS syndicate.
<table>
<thead>
<tr>
<th>Member</th>
<th>Status</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>British Council</td>
<td>“a public corporation (in accounting terms)”</td>
<td>British Council (2017a, NP)</td>
</tr>
<tr>
<td>Cambridge Assessment (Brand)</td>
<td>A “non-teaching department of the University of Cambridge”</td>
<td>Cambridge Assessment Group (2017b, NP)</td>
</tr>
<tr>
<td>IDP Education Limited</td>
<td>A for-profit corporation that is listed on the Australian Stock Exchange.</td>
<td>IDP Education Australia (2017, p. 6)</td>
</tr>
</tbody>
</table>
1.6 Revenue

The total annual revenue and financial surpluses/profits earned by members of the IELTS consortium for supplying IELTS’s goods and services is not disclosed in each entity’s Annual Financial Reports. Members of the IELTS consortium report their IELTS revenues as a component of a consolidated revenue item (British Council, 2016, p. 60; Cambridge Assessment Group, 2015, p. 7; IDP Education Australia, 2016, p. 17). This observation is consistent with IELTS’s universally secretive business practices, especially its undisclosed internal examination scoring processes (e.g. Demetriou, 2016, p. 20).

For financial year 2015/16, IDP Education reports that “English Language Testing” (IELTS) accounts for $237.1M of total revenues. Income earned by IELTS accounts for 66% of their total revenues and 72% of their largest two income generating sources (IDP Education, 2017). It is fair to classify IDP Education as an IELTS-oriented profit-maximizing global commercial corporation.

Members of the IELTS consortium and their authorized agents charge registrants a commercial fee to sit the IELTS exam. IELTS charges a standard fee by test center location.

IELTS does not offer a fee-waiver or a reduced fee schedule for those who live in a state of “income poverty” as defined by the United Nations Educational, Scientific and Cultural Organization (2016, p. 160).
Table 4, shows the fees schedule in six selected countries as at March 2017. This data set contains a member nation from each continent (excluding Antarctica), including the Indian subcontinent.

**Table 4:**

**Selected IELTS Registration Fees by Country: Cost Per Test**

<table>
<thead>
<tr>
<th>Country</th>
<th>(a) Commercial Fee</th>
<th>(b) USD</th>
<th>(c) GDP USD Per capita</th>
<th>(b)/(c) Cost Per capita</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ghana</td>
<td>GHS980</td>
<td>$216</td>
<td>$1,388</td>
<td>15.6%</td>
</tr>
<tr>
<td>India</td>
<td>Rupees 11,300</td>
<td>$173</td>
<td>$1,587</td>
<td>10.9%</td>
</tr>
<tr>
<td>China</td>
<td>RMB 1, 960</td>
<td>$284</td>
<td>$7,617</td>
<td>3.7%</td>
</tr>
<tr>
<td>Brazil</td>
<td>BRL800</td>
<td>$277</td>
<td>$11,387</td>
<td>2.4%</td>
</tr>
<tr>
<td>United Kingdom</td>
<td>GBP200 (Immigration)</td>
<td>$247</td>
<td>$46,461</td>
<td>0.5%</td>
</tr>
<tr>
<td>USA</td>
<td>USD$235</td>
<td>$235</td>
<td>$54,306</td>
<td>0.4%</td>
</tr>
</tbody>
</table>

Sources: (a) British Council - India (2017); British Council and National Education and Examination Authority of China (2017), British Council (2017d; 2017e; 2017l; 2017m). (b) Bank of Canada (2017); (c) United Nations (2017a).
1.7 IDP Education

IELTS test centers are managed jointly by IDP Education and the British Council. There are over 1,100 test centers located in over 140 countries (IELTS, 2017b). IDP Education is responsible for managing IELTS test centers based in the Americas, the Middle East, Africa, Europe and Asia (IDP Education, 2017c).

IDP Education is a for-profit, profit maximizing limited liability corporation that trades on the Australian Stock Exchange. Australia’s universities own 50% of the shares IDP Education (IDP Education, 2017c). The remainder of IDP Education’s shares are owned by tens of thousands of independent private parties. Australia’s public universities therefore exert dominant unfettered control over IDP Education’s Board of Directors (IDP Education, 2017, p. 27).

Many respected public policy commentators regard Australia’s public universities as profit-focused businesses that offer low admission standards and lax academic standards for many/most courses to maximize enrolments, cash flow, graduation rates and economic surpluses. They also are “aimless” in purpose in comparison to their historical foundations that center on the discovery and dissemination of knowledge and the advancement of society. Figure 3, overleaf, contains the caption of a news article authored by Australian economics journalist Ross Gittins (2017) that captures this popular sentiment. This news article was published by Australia’s largest newspaper by circulation, the Sydney Morning Herald, on 17 September 2017.
We've turned our unis into aimless, money-grubbing exploiters of students

Of the many stuff-ups during the now-finished era of economic reform, one of the worst is the unending backdoor privatisation of Australia’s universities, which began under the Hawke-Keating government and continues in the Senate as we speak.

Source: Gittins in Sydney Morning Herald (2017)

Corruption is endemic throughout Australia’s university education export market. One international student earns an Australian public university approximately 300% more income than one domestic student who studies the same course as a Commonwealth-sponsored student. Figure 4 details the findings reported by the Australian Broadcasting Corporation’s (cited in Visentin, 2015) respected Four Corners investigative journalism television program.

Corruption rise in international student sector of leading Australian universities, ABC's Four Corners reports

Source: Visentin (2015)
IDP Education’s revenues peak when a maximum number of their core clients (i.e. IELTS test-takers) fail their IELTS exams and are required to re-sit these exams to achieve their required scores. IELTS test-takers must advise IELTS of the intended use of their Test Report Form as a mandatory condition of enrolment (see section 4.4). Using simple Google searches, any IELTS staff member can determine the score required by each IELTS test-taker. They may also refer to IELTS’s database. IELTS scores required for immigration purposes for work/residency visa classes for Canada, Australia and Britain are common knowledge among IELTS’s academic staff.

Figure 5 shows the stock price movement for IDP Education over the past 12 months.

**Figure 5**

**IDP Education Stock Price Movements: 2018**

Market summary > Idp Education Ltd  
ASX: IEL - Mar 16, 4:10 PM GMT+11

7.50 AUD ↑ 0.17 (2.32%)

<table>
<thead>
<tr>
<th></th>
<th>1 day</th>
<th>5 day</th>
<th>1 month</th>
<th>3 month</th>
<th>1 year</th>
<th>5 year</th>
<th>max</th>
</tr>
</thead>
</table>

Source: Google Finance (2018)
In 2016, the Board of IDP Education awarded its Chief Executive Andrew Barkla an additional $14,000,000 performance bonus (The Australian, 2016). This payment was in addition to his contractual salary package of circa AUD$2.4 million earned during financial year 2015/2016.

Figure 6
IDP Education: Profits before Pedagogy

![IDP chief Andrew Barkla’s $14m pay cheque draws flak](source)

*Source: The Australian (2016)*

*Note the racial profiling in IDP Education’s life-size corporate poster.*

Figure 7 below shows the salary component of IDP Education’s most senior executives for financial year 2016/17.

**Executive KMP Remuneration Mix**

The mix of remuneration for the Executive KMP in FY17 is shown in the following table and a detailed description of each is discussed in more detail below:

<table>
<thead>
<tr>
<th>Executive KMP</th>
<th>Fixed Annual Remuneration ($)</th>
<th>Short Term Incentive (At-Target) ($)</th>
<th>Short Term Incentive (Stretch) ($)</th>
<th>Long Term Incentive (At-Target) ($)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Andrew Barkla</td>
<td>800,000</td>
<td>480,000</td>
<td>643,200</td>
<td>480,000</td>
</tr>
<tr>
<td>Murray Walton</td>
<td>391,000</td>
<td>195,500</td>
<td>261,970</td>
<td>136,850</td>
</tr>
<tr>
<td>Warwick Freeland</td>
<td>415,484</td>
<td>208,242</td>
<td>279,044</td>
<td>587,418^{4}</td>
</tr>
</tbody>
</table>

*Source: IDP Education (2017b, p. 37)*
As at 17 November 2017, the board of IDP Education comprised seven members. The profile of one of these board members, David Battersby, is described by IDP Education as a career educator with extensive experience in the post-secondary education sector (IDP Education, 2017b). The other six members’ profiles, as detailed on IDP Education’s webpage portrays these directors as career corporate executives. For example, “Ariane [Barker currently] heads the Products and Markets division at wealth management firm JBWere.” (IDP Education, 2017b)

1.8 British Council

The British Council is a founding member of the IELTS consortium. The British Council is responsible for managing IELTS test centers in locations based in the Americas, the Middle East, Africa, Europe and Asia (IELTS, 2017b).

1.9 University of Cambridge

The University of Cambridge’s wholly owned subsidiary, Cambridge Assessment Group, authors and pre-tests official IELTS examination test materials.

Cambridge Assessment Group authors 16 other tests in additional to IELTS. Figure 8, overleaf, lists these test as extracted from Cambridge Assessment’s official website.
Cambridge Assessment Group authors IELTS exam preparation resources that are available for purchase and a limited number of open-access IELTS exam preparation resources (Cambridge English, 2017f).

**Branding**

During financial year 2004/2005 Cambridge Assessment abandoned its ‘A logo’ and adopted the Coat of Arms of the University of Cambridge as its logo. By doing so, the University of Cambridge explicitly and willfully uses its ancient brand to underwrite and promote the commercial sale of goods and services produced by Cambridge Assessment Group, including IELTS.
This year marks the eleventh anniversary of our adoption of the Cambridge Assessment brand. We have decided to celebrate by updating it! Gone is the old ‘A’ logo and in its place is a return to the University of Cambridge coat of arms. The new logo allows us to highlight our unique position as the oldest exams group still in existence and the only one still attached to a university. It also aligns our work more closely with that of the University and other members of the University family with which we work including Cambridge University Press, the Faculties of Education and Mathematics and various other departments. The new brand reflects both how we have grown as an international organisation and how the world has changed since we became Cambridge Assessment in 2005.

Source: Cambridge Assessment (2017).

Author’s note: Despite this endearing propaganda image, Cambridge Assessment does not offer discounts to residents of developing nations in Africa who purchase their commercial materials.

IELTS Inferior Quality Control

Cambridge Assessment Group state on their official website that their externally assessed exams are returned to Cambridge for quality control purposes. They also appoint two assessors for speaking tests. These quality control processes do not apply to the IELTS exam.
In comparison to other exams authored by Cambridge Assessment, the IELTS test is subject to a lower standard of quality control by Cambridge Assessment than tests listed in figure 8.

1.10 Political connections

There are strong political connections between the economic beneficiaries of IELTS’s state-sponsored global frauds and IELTS’s global human rights crimes. The Vice Chancellor of the University of Cambridge, Stephen Toope, was awarded the title ‘Officer of the Order of Canada’ by the Canadian Government in 2015 (Canadian Press, 2015).

Members of the IELTS consortium have proactively forged deep direct and indirect connections with governments, transnational corporations and other influential stakeholders such as professional registration bodies and post-secondary educational institutions. In its 2017 Annual Report for shareholders, IDP Education refers to itself as “globally connected” (Figure 11).
Figure 11

IDP Education: Globally Connected *Modus Operandi*

Source: IDP Education (2017b)

*Note IDP Education’s persistent use of youthful and non-white racial client profiling.*
Table 5 summarizes the direct connections that members of the IELTS consortium share with governments in Australian and British jurisdictions.

### Table 5
**IELTS’s Government Connections**

<table>
<thead>
<tr>
<th>IELTS member</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>IDP Education</td>
<td>Owned by 38 public Australian universities. These universities are regulated by the governments of six Australian states and two territories. The Australian National University and the University of Canberra are regulated by Federal Acts of the Parliament of Australia. The bulk of each universities’ funding is secured from state/territory and Federal Government grants.</td>
</tr>
<tr>
<td>British Council</td>
<td>A British public corporation that is governed by Royal Charter.</td>
</tr>
<tr>
<td>University of Cambridge</td>
<td>A public British post-secondary education institution that was established by Royal Charter.</td>
</tr>
</tbody>
</table>

The political economy of IELTS intertwines the political economy of Britain, Australia and other nations (e.g. Blackie, 2017). For example, in 2017 British Health Secretary Jeremy Hunt sold Hotcourses to IDP Education (Australia) for 30 million pounds sterling (British Broadcasting Corporation, 2017).

Prior to 5 November 2011, IELTS was the main English language test approved by the Australian Government to manage its work visa program for foreign nationals (Australian Government, 2013). The Canadian English Language Proficiency Index Program (CELPIP) supports Canada’s English language testing regime (for skilled migration) via around 50 branches in Canada. CELPIP also maintain a branch office in New York City and the United Arab Emirates (CELPIP, 2017).
In contrast to other Western nations such as Australia and New Zealand, the Canadian Government offers IELTS highly favorable business treatment that is tantamount to a virtual monopoly at the global level. The Canadian Government does not allow other global English language testing agencies such as Pearson and ETS (e.g. TOEFL and TOEIC) to support their skilled migration work visa program.

Table 6 compares Canada’s duopoly model to choices available to migrants who speak English and aim to secure a work and/or residency visa for Australia and New Zealand.

### Table 6

Comparative English Language Tests: Immigration

<table>
<thead>
<tr>
<th>Canada</th>
<th>Australia and New Zealand</th>
</tr>
</thead>
<tbody>
<tr>
<td>IELTS</td>
<td>IELTS</td>
</tr>
<tr>
<td>TOEFL</td>
<td></td>
</tr>
<tr>
<td>CELPIP</td>
<td>Pearson</td>
</tr>
<tr>
<td><em>Operates only in Canada, New York City and the United Arab Emirates</em></td>
<td>Cambridge English</td>
</tr>
<tr>
<td></td>
<td>Occupational English Test</td>
</tr>
</tbody>
</table>

Sources: Canadian Government; Australian Government (2017); New Zealand Government (2017).

In contrast to CELPIP - TOEFL, Pearson and Cambridge tests are offered in all continents.

**Lobbying agenda**

When conducting this research project, a PhD-qualified (Education) practicing IELTS examiner based in Asia informed me via her official university account that the IELTS consortium routinely
and aggressively lobbies governments, professional registration bodies and other authorities that use English language testing for registration and regulation purposes. This examiner, who has published peer-reviewed research papers about IELTS, informs me that IELTS lobbyists spin a common theme to policy makers akin to “You can trust us, we are the experts” when they promote IELTS services and recommended minimum English language benchmarks to regulators. Her research concludes that most policy makers trust IELTS’s recommendations at face-value as they do not know the difference between e.g. IELTS band score 5 (modest user) and band score 8 (very good user).

Relatively few professionals (e.g. Nursing Executives) and government regulators in Australia, Canada and Britain are required to engage with IELTS’s exam preparation materials or test content as IELTS clients or as in-depth researchers. Most of these people are citizen residents from birth of their host country and completed their studies in English.

There is ample evidence available in the public domain that suggests government authorities and professional registration bodies have acted on the advice that has been proactively marketed by IELTS’s lobbyists. Moreover, they have not sought independent advice to validate advice offered by these agents. This situation is not surprising. IELTS is owned by the British Council, University of Cambridge and Australia’s 38 public universities. Those who are not familiar with the hyper-secretive modus operandi of IELTS and its ruthless revenue maximizing tactics have most likely acted in good faith and trusted the recommendations put forward by IELTS’s corrupt lobbyists.
Figure 12 shows that the Office of the Commissioner of Lobbying of Canada (2017) has registered IELTS and their associates as an official lobbyist of the Government of Canada. This Commissioner’s website itemizes these agents to include IELTS Canada, IDP Education and the British Council.

![Figure 12](https://lobbycanada.gc.ca/app/secure/ocl/lrs/do/clntCmmLgs?jsessionid=0001Dbf7FmgpxaHl)

**All Monthly Communication Reports for IELTS (The Partners)**

Patricia Toner, Global Public Affairs (Consultant)

[Learn more...](https://lobbycanada.gc.ca/app/secure/ocl/lrs/do/clntCmmLgs?jsessionid=0001Dbf7FmgpxaHl)

Results below are sorted by posted date, beginning with the most recent.

### Results 1-1 of 1

**IELTS (The Partners)**

Consultant: Patricia Toner

Designated Public Office Holders who participated in the communication:

- Serge Cormier, Member of Parliament | Immigration, Refugees and Citizenship Canada

Subject Matter of the communication: Official Languages, Employment and Training, Immigration

Communication date: 2017-03-23

Posted date: 2017-04-15

Communication number: 359461-397361

[View associated registration](https://lobbycanada.gc.ca/app/secure/ocl/lrs/do/clntCmmLgs?jsessionid=0001Dbf7FmgpxaHl)

Source: Office of the Commissioner of Lobbying of Canada (2017)
Infiltration

IELTS routinely pressure professional registration bodies to adopt IELTS as the sole English language test for assessing foreign national registrants. Establishing a monopoly market enables IELTS to repeatedly use profit-gouging examination fraud to fail foreign national professionals who must sit an IELTS exam to gain professional registration status and a professional work visa. This situation is most common in Canada where IDP Education and IELTS have established a deep network of corrupt business partners, especially in the healthcare sector. IELTS offer monopoly business partners various ‘inducements’ such as cash sponsorships for their conferences.

The Australian Association of Social Workers (AASW) is an example of a professional registration body that has a serious case to answer in the public domain. International student graduates who aim to register with AASW inform me that they repeatedly receive marginal fail scores for writing. IELTS can detect their career and visa objective via their intrusive application form (see page 86).

I compare the monopoly policy of AASW to the Nursing and Midwifery Board of Australia (2018). This Board accepts Pearson, IELTS, TOEFL and the Occupational English Language Test (OET).

Nurses and midwives routinely communicate critical healthcare information in settings such as the operating theatre and emergency department. Other Australian medical registration bodies accept TOEFL, Pearson and OET as rigorous English language exams. IELTS’s monopoly business partners such as the AASW can no longer rely on their hollow argument that IELTS is the only ‘rigorous’ English language test that can be trusted by the professional community.
IELTS’s sponsorship regime has deeply infiltrated a global network of stakeholders who may provide impartial advice and support to those who are required to undertake an official English language test such as IELTS. Migration agents play an important role in offering their clients sound impartial advice to support their visa applications. With regards to language testing, this role is more profound in jurisdictions such as Australia and New Zealand that offer competitive options. Numerous migration agents have publicly criticized the design and assessment of the IELTS test in the public domain. This notably includes high IELTS’s failure rates among native and advanced English language speakers (e.g. Suss, 2011; Coates cited in Kenny, 2015).

IELTS’s aggressive lobbying agenda corrupts the market for English language testing services. One way that IELTS corrupts this market is by offering cash sponsorship payments to migration stakeholders such as the Migration Institute of Australia. Figures 13 and 14 documents this claim.

Figure 13
IELTS Infiltration: Migration Institute of Australia

Source: Migration Institute of Australia (2017a)
The Migration Institute of Australia sponsorship deal is not a recent, isolated example of IELTS’s infiltration of English language testing stakeholders. For example, in 2017 IELTS sponsored a conference coordinated by the European Association for International Education (2017) as a platinum grade sponsor. Figure 15 documents this claim.

**Figure 15**

*Infiltration: European Association for International Education*

We would like to thank the following sponsors for their generous support of the 29th Annual EAIE Conference and Exhibition.

**Platinum sponsors**

*Source: European Association for International Education (2017)*
1.11 Immunity from prosecution

Members of the IELTS consortium perceive that they enjoy guaranteed political immunity from prosecution for their global crimes because they are backed by powerful entities. These include the global resources of a multibillion dollar transnational corporation (IDP Education Limited), Australia’s state, territory and federal Governments in addition to public institutions that are regulated by a national government that is a G8 member state (i.e. British Council and University of Cambridge). To a large extent, this perception is unofficially correct. IELTS have never been charged or prosecuted for examination frauds and other crimes such as extortion that they have deliberately perpetrated in Australian, British and other jurisdictions on a massive global scale.

“Much of the distress caused by this dreadful organization [IELTS] derives from the fact that it is neither fish nor fowl. It presents itself as a government agency, a diplomatic body, but is really a government subsidized business, as so many of us know to our cost.”

David Blackie (2017), Managing Director of International Education Connect

Blackie’s account of the British Council (IELTS) posing publicly as a diplomatic quasi government authority is accurate. In 2015, the District Consumer Forum Chandigarh (India) petitioned the British Council (IELTS) to attend court to respond to a consumer complaint lodged by an aggrieved IELTS test-taker. The British Council did not attend this court hearing and lost on default.
The British Council (IELTS) argued before the Indian Appeal Court that it had immunity from prosecution as it was an official representative of the British Government. This court rejected this argument and stated that there was no diplomatic documentation provided by the British Council to support this claim. This superior court awarded Rupees 50,000 damages against the British Council (IELTS) for violation of domestic consumer protection law (The Times of India, 2015).
Canadian scams

The Canadian Government bluntly relies on IELTS fraud to manage its international student fee maximization policy scam. This scam repeatedly uses bogus IELTS fail scores of 6.5 for writing and speaking (see section 4.4). This mutually beneficial, lucrative partnership between the Canadian Government and IELTS explains why IDP Education’s Canadian branches and IELTS Canada have never been prosecuted by Canadian authorities for systemic extortion, racketeering and examination frauds committed inside Canada’s jurisdictions.

The Canadian Government’s requirement that all eligible international students must pass an English (or French) language test after they graduate, to earn a Canadian skilled worker resident visa, is a blatant income maximization scam. To illustrate this argument, please consider this scenario that applies to all international students who graduate in Canada. An international student earns a four-year Doctoral Degree in French Language Linguistics from the University of Ottawa and passes a written and oral Doctoral thesis examination conducted in the English language. The Canadian Government does not accept this Canadian award as evidence of English or French language proficiency. All international students who study and graduate in Canada are required to prove their English or French language competencies via a language test after they graduate to qualify for a skilled residency visa (Government of Canada, 2017).
Canada’s Governments act to attract as many international students as possible to maximize the injection of offshore revenue into its thriving domestic economy. Most persons who apply for a Canadian residency visa are not proficient in French and opt to take an English language test to support their application for a Canadian residency visa. Over the past decade, IELTS has proven itself to be a loyal proxy for Canada’s opportunistic, coordinated trade and immigration policy scams. Figure 17, extracted from IDP Education’s 2017 Annual Report captures this mutually beneficial partnership between IDP Education and the Canadian Government.

**Figure 17**

**Canada and IDP: Business Partners**

Similarly, the Canadian market is benefiting from open and inviting regulatory settings with government policies designed to attract international students to the country. IDP Education has benefited from this dynamic with increasing levels of interest from prospective students in our source countries for study in Canada during FY17.

Source: IDP Education (2017b, p. 18)

The business structure of IELTS test centers are comparable to the Franchisor–Franchisee system. The lucrative virtual monopoly (i.e. disparate duopoly) market for English language testing services (to support Canada’s skilled migration program) has proven to be irresistible among opportunistic, unconscionable public and private post-secondary education providers in Canada.

There are more than 125 IELTS Canada test centers. There are around 50 IELTS test centers in the United States. The United States has around 300 million more residents than Canada.
Most test-takers who purchase services from an IELTS Canada test center are international students who graduate inside Canada. Those requiring an English language test report for other purposes may access several providers that operate in Canada or America such as Pearson and TOEFL. IDP Education acknowledges in its 2016/2017 Annual Report that a significant number of English language test-takers regard IELTS as the English language test option that they are most likely to fail. These test-takers are averse to selecting IELTS when they have choice.
Figure 19

Public Suspicion about the Fairness of the IELTS test

Countless allegations of predatory, unconscionable IELTS examiner fraud and profiteering have been targeted at Canada’s duopoly (i.e. virtual monopoly) market (e.g. Canadavisa.com, 2015). The Canadian Government deceitfully markets permanent residency for onshore graduates as a false ‘carrot’ to international students to entice maximum enrolments. The Canadian Government blatantly uses IELTS examiner fraud as a covert proxy to expel most international students from their country after they graduate and are no longer profitable to exploit.

1.12 Prior research

There is an absence of in-depth contemporary research that provides an independent, comprehensive and constructive assessment of the business practices of the IELTS consortium and its examination content. The IELTS Research Report series does not provide an independent assessment of the pedagogical design of the IELTS exam and the business practices of the IELTS consortium.
The IELTS Research Report series is funded, stage-managed, edited, published and disseminated by IELTS’s head office. This research series is another example of how IELTS purchase the loyalty of potential critics. Academics who receive an IELTS grant may be permitted to use this cash to fund release from their classroom teaching duties. It is common knowledge among academics that many of their colleagues prefer to use their research grants to fund release from teaching duties, attend overseas conferences and pay for associated costs such as hotels.

This sycophantic business-academic structure likely explains why case studies published by the IELTS Research Report series focus on narrow aspects of the IELTS exam. Most of these studies read as interesting trivia concerning topical aspects of the IELTS exam. They do not offer an impartial, deep global critique. For example, I cite a recent IELTS Research Report study authored by David Allen (2017) to illustrate the typical narrow focus of the IELTS Research Report series. The title of this paper is “Investigating Japanese undergraduates’ English language proficiency with IELTS: Predicting factors and washback” (Allen, 2017).

This report aims to fill this critical gap in the existing research. The author of this research report is independent, self-reflexive and self-funded. He has never received payment, resourcing or technical support from IELTS’s competitors or other parties.
Part 2  Methodology

In stark contrast to IELTS’s universally secretive business practices, examination content and testing procedures, this research project aims to be transparent, accountable and openly self-reflexive of the minor limitations inherent in Part 1 of this two-part report series. Phase 2 of this research project aims to interview *circa* 20 former and 20 currently practicing IELTS examiners. This extension should further strengthen the reliability and validity of inferences drawn in this project. I warmly welcome constructive feedback and questions from members of the public.

The methodological design of this report conforms to the ethical requirements, conventions and high standards imposed on scholars and practitioners who study at graduate research level. Events and quantitative facts that are common knowledge among those who work in the English language testing industry are not supported with a reference, as is customary among scholarly researchers (*e.g.* Massachusetts Institute of Technology, 2017).

2.1  Data analysis

This project uses layered and stratified purposeful sampling techniques to obtain a representative data set from the population. This research project analyses *circa* 3,300 independent pieces of evidence obtained from ten principal data sources. This project achieved data saturation after the examination of *circa* 100 pieces of evidence. This evidence includes multiple independent data obtained from ten data sets shown in Table 7.
Table 7 provides an example of each primary and secondary data source.

### Table 7

#### Ten Core Data Sources

<table>
<thead>
<tr>
<th>Primary data type</th>
<th>Quality control</th>
<th>Example</th>
</tr>
</thead>
<tbody>
<tr>
<td>IELTS commercial policy documents.</td>
<td>Source is official.</td>
<td>IELTS (2017c)</td>
</tr>
<tr>
<td>IELTS exam preparation resources.</td>
<td></td>
<td>British Council (2017e)</td>
</tr>
<tr>
<td>IELTS Test Report Forms.</td>
<td>Source is neutral, verifiable and does not claim examiner fraud.</td>
<td>c/- Google Images.</td>
</tr>
<tr>
<td>Discussion with current and former IELTS examiners.</td>
<td>The identity of the witness is independently validated for most data sources from each category.</td>
<td>c/- e.g. Complaint Board (2017)</td>
</tr>
<tr>
<td>Public testimonies from current and former IELTS staff.</td>
<td></td>
<td>IELTS Liz (2017)</td>
</tr>
<tr>
<td>Public testimonies from current and former IELTS examinees.</td>
<td></td>
<td>The Australian (2011)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Secondary data type</th>
<th>Quality control</th>
<th>Example</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public reports e.g. media articles.</td>
<td>Source is triangulated with at least one primary source document.</td>
<td>Special Broadcasting Service (2017)</td>
</tr>
<tr>
<td>Public testimonies of private IELTS instructors.</td>
<td>Triangulated with several data sources. The identity of the author must be accessible.</td>
<td>Winkler (2016)</td>
</tr>
<tr>
<td>Public testimonies of academic research scholars e.g. linguists.</td>
<td>Research must conform to academic standards and conventions imposed on graduate research scholars.</td>
<td>Uysal (2010)</td>
</tr>
<tr>
<td>Public testimonies from IELTS stakeholders such as registered migration agents.</td>
<td>Evidence is available for public inspection.</td>
<td>Suss (2011)</td>
</tr>
</tbody>
</table>

**Analytical tools**

This report uses specialist content analysis tools that are appropriate to analyze each type of evidence. Table 8, overleaf, provides a summary of the main types of data analysis tools and offers an example for each.
<table>
<thead>
<tr>
<th>Analytical tool</th>
<th>Analysis application and example</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy analysis</td>
<td>Policy documents and official IELTS customer service materials. IELTS Canada (2017a) <a href="https://www.ieltscanada.ca/resultsenquiry">https://www.ieltscanada.ca/resultsenquiry</a></td>
</tr>
<tr>
<td>Conversation analysis</td>
<td>Free flowing speech between two or more persons. IELTS (Official), (2015) <a href="https://www.youtube.com/watch?v=cAf41I68HD8">https://www.youtube.com/watch?v=cAf41I68HD8</a></td>
</tr>
</tbody>
</table>
2.2 Data reliability

This research report relies overwhelmingly on non-reactive data sources such as policy documents, Test Report Forms and existing published testimonies. The vast bulk of data sources are not influenced by the objectives of this research or by the personal characteristics of the researcher. This multidisciplinary mixed-methods study triangulates primary and secondary data extracted from hundreds of independent data sources dated over the past ten years to draw inferences. This methodological design aims to achieve data reliability, validity and replicability.

Chapter 3 Evidence

This section offers an example of core evidence which underpins analysis in section 4 and Appendix 2 of this report. These core data sets are classifiable as: official IELTS policy documents, official IELTS pedagogical content, Test Report Forms and public testimonies.

3.1 Policy documents

IELTS’s official public issue policy documents are available online. I define the term ‘policy-documents’ to include official IELTS documentation (paper and digital versions) that disclose and implement IELTS’s administration procedures. IELTS’s candidate registration form is an example of a policy document as its content contains information about IELTS’s policies and procedures.

Figure 20, overleaf, is an extract from IELTS’s application form.
IELTS Application Form: Forced Waiver of Civil Rights

Source: IELTS (2017c, p 4)

Researcher’s observation:

IELTS have monopoly status to serve Canada-bound skilled migration applicants in 139 countries.

As a condition of registration, IELTS dictates that all registrants must waive their civil right to take legal action against IELTS. This policy is unconscionable as it takes advantage of the disparate bargaining power that exists between one individual from a vulnerable demographic compared to the mammoth global power enjoyed by a multibillion dollars business consortium.

IELTS use condensed italicized fine-print (shrunken) font footnote style text to diminish the clarity of legal jargon that empowers its legal position to the maximum advantage. The use of condensed fine-print exemption clauses at the end of contracts is widely regarded as a deceitful, unethical, exploitative and unnecessary business practice nowadays.

3.2 Pedagogical content

All official IELTS pedagogical content is sourced from official IELTS exam preparation materials. This includes commercial and open-access sources. In line with IELTS’s universally secretive
business practices, IELTS only release a non-specified, self-selected percentage of examination content used in prior exams. I estimate that this self-selective sample size does not exceed 5% of all test material that IELTS use to conduct ‘behind closed doors’ examination testing.

Textual content

Figure 21 is an example of a question from IELTS’s speaking test.

**Figure 21**

**Sample IELTS Exam Content: Speaking**

<table>
<thead>
<tr>
<th>Let’s consider first of all how people’s values have changed.</th>
</tr>
</thead>
<tbody>
<tr>
<td>• What kind of things give status to people in your country?</td>
</tr>
<tr>
<td>• Have things changed since your parents’ time?</td>
</tr>
</tbody>
</table>

Finally, let’s talk about the role of advertising.

| • Do you think advertising influences what people buy? |

Source (British Council, 2017f)

Researcher’s observation:

The IELTS exam includes a general-knowledge hidden *curriculum* that sets most test-takers up to fail. To avoid earning zero credit for the second part of this speaking test sub-component, candidates are required to have knowledge of the values that were dominant in their parents’ societies prior to their birth. Alternatively, candidates may improvise and ‘fake’ their answer. IELTS do not provide a *curriculum* document or syllabus document to support each exam cycle. Candidate’s may be verbally quizzed on any topic without notice.
Diagrammatical content

The image shown in Figure 22 is an example of IELTS content that a candidate must navigate during the IELTS listening test (British Council, 2017e).

Researcher’s observation:

IELTS requires candidates to coordinate their reading, writing, spelling and visual cognitive skills while they are ostensibly being tested for their listening skills. Candidates who have a miniscule spelling error in their written response receive a score of zero for that component of the listening test. This false score suggests that the candidate could not comprehend that word. This is another example of how IELTS deliberately sets test-takers up to fail to maximize profits.
Test Report Forms

Tens of thousands of Test Report Forms are available online. There is no reason for the critical reader to suspect that most of these Test Report Forms are forgeries. Most of these forms uploaded online meet these criteria:

- The image is of high quality – no categories are smudged or appear doctored;
- The owner of the document can be traced by linking the upload to a personal website that shows a long history of social media engagement such as Facebook;
- The owner of the document has no political agenda and they are not trying to sell their certificate or identity.

Figure 23 shows how Test Report Forms are easy to locate via Google images.

Figure 23
IELTS Test Report Forms

Source: Google Images (2017)

For ethical reasons, I have shrunk these images to protect the identity of the owner of the Test Report Form.

This rich data source enables me to quantitatively confirm that IELTS routinely awards scores of 6.5 for speaking and/or writing in situations where the same examinee repeatedly earns higher scores (i.e. 7.0 to 9.0) for listening and reading during the same test.
3.3 Witness testimonies

This study draws on witness testimonies. This includes private testimonies offered to the author of this report in addition to verifiable accounts that exist in the public domain.

Since March 2017, the author of this research report has consulted directly with 63 members of the public (e.g. IELTS stakeholders) to discuss virtually all aspects of the IELTS exam. This interim sample includes former IELTS test-takers (35), linguistics and pedagogy academics (19) and current and former IELTS examination staff (9). In addition to this sample, I draw on my extensive face-to-face consultations with two practicing IELTS examiners during 2010 when I was employed and trained as a learning skills instructor at an accredited Australian university. In this capacity, I was trained by this University to assist students to prepare for the IELTS examination. In my capacity as a learning skills tutor, I consulted with around 25 IELTS test-takers, most of whom had previously sat for one or more IELTS tests in the past. Furthermore, I draw on my experience working as an IELTS tutor at a Registered Training Organization in New Zealand (mid to late 2015) in addition to volunteer IELTS tutoring work performed between 2010 and 2017 in Australia and New Zealand, such as my volunteer work with The Free School.

Table 9, overleaf, summarizes the sources and quantity of my direct engagement data collection consultations.
### Table 9

**Face-to-Face Consultations: Data Collection**

<table>
<thead>
<tr>
<th>Source</th>
<th>Period</th>
<th>Total consultations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Work experience</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Face-to-face-consultation; IELTS examiners</td>
<td>2010 to 2017</td>
<td>2</td>
</tr>
<tr>
<td>IELTS candidates</td>
<td></td>
<td>54</td>
</tr>
<tr>
<td><strong>Scholarly research</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Digital consultations: email, chat forums, Gmail chat, Skype.</td>
<td>2016 to 2017</td>
<td>75</td>
</tr>
<tr>
<td>Face-to-face consultations</td>
<td>2016 to 2017</td>
<td>6</td>
</tr>
<tr>
<td><strong>Total consultations</strong></td>
<td></td>
<td>137</td>
</tr>
</tbody>
</table>

Since September 2016, I have advertised this research project in over 50 locations on the worldwide web that are administrated by independent parties. Between September 2016 and March 2017 my request for feedback was exclusively neutral. I did not invite aggrieved IELTS customers or stakeholders to participate. I offered my contact details and invited IELTS stakeholders to discuss their experiences with me about IELTS in confidence. Examples of these sources include:
• Academic research repositories such as www.academia.edu and www.researchgate.net
• Immigration chat forums such as www.canadavisa.com
• IELTS preparation forums such as www.ieltsnetwork.com and www.tefl.net
• Social network media such as www.facebook.com/IeltsIsFraud/
• YouTube subscriber accounts such as https://www.youtube.com/channel/UC_K5RL7sRzU7T3IbGlSzpaw

Those wishing to inspect these advertisements should be able to readily access most or all advertisements using the Google search string shown in Figure 24.

**Figure 24**

**Google Search String: IELTS Justice Project**
Prior to March 2017, I had not published any criticism about IELTS in response to this research project. I have discussed stakeholders’ experiences predominantly via email and face-to-face meetings. When evaluating the evidence obtained from these sources, I have offered much higher weight to those persons who have responded using an institutional email and/or have identified themselves in person. All university research academics from linguistics and education disciplines have identified themselves (in confidence) and have offered a constructively critical account of their experiences in their capacities as IELTS examiners, instructors and researchers.

**Public testimonies**

Based on my online sampling research, I conservatively estimate that the number of public testimonies, that identify the speaker/writer and are critical of IELTS number in the tens of thousands. The overwhelming bulk of these testimonies are attributable to stakeholders who have a close association with the IELTS exam. These parties include:

- Migration agents;
- Former IELTS examiners;
- Consumer affairs advocates;
- Professional IELTS instructors;
- Current (in training/preparing) and former IELTS test-takers;
- Academics who specialize in pedagogical and linguistics research.
Multiple critics of IELTS have uploaded a copy of their Test Report Form online. This act increases the likelihood that their contribution is authentic.

If I extend this definition of IELTS critics to include online posts that are authored by anonymous and semi-anonymous (e.g. face picture and online screen name) persons, I estimate that these posts total in the hundreds of thousands over the past two decades. An example of a source that contains anonymous, semi-anonymous and identifiable criticism of the IELTS exam is a petition uploaded on Change.org coordinated by ‘Dhanush’ from India (2018). Figure 25 shows an extract of this petition, which has been signed by more than 4,000 people in recent months.

Figure 25
Global Petition: IELTS Secrecy

Figure 26, overleaf, is an example of a public testimony that is critical of the IELTS. These images are extracts from a Table of Contents which registered Migration Agent (Australia) Michael Suss submitted to the Parliament of Australia’s “Inquiry into Registration Processes and Support for Overseas Trained Doctors” in 2011. This sample evidence illustrates how serious allegations of IELTS profiteering and corrupt business practices have persisted among professionals in the business community for several years. Moreover, they have been made by citizens of OECD member nations such as Australia who are not required to take an IELTS test for any purpose.
The excessive cost of the IELTS test – Is IELTS involved in retail price maintenance? 

Background to the English language proficiency requirements

Organisations demand high IELTS scores but have no idea why they require such high scores

Why does DIAC keep tightening the English language proficiency requirements?

The validity and reliability of the IELTS test and other claims made by IELTS Australia

How does AHPRA treat OTDs who cannot achieve the high levels of English language proficiency?

MIGRATION ACT 1958 - SECT 290

The discrimination shown by many organisations is simply an ‘abuse of power’

Does IELTS hide behind “secrecy” and “security” to avoid scrutiny of their test?

Charter of Human Rights and Responsibilities Act 2006

Why does IELTS fail to provide feedback?

Five questions which the promoters of IELTS must answer instead of hiding behind “secrecy”

IELTS refers to their test having a “Real-life approach”- is this true?

Is the IELTS test really ‘fair’ as promoted by IDP Australia?

Analysis of the Data for Candidate In

If IELTS was such a reliable test, why are End’s results all over the Place?

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Michael Suss MBA MEd MEPA MEdStud (TESOL)  
Educational Consultant  
Registered Migration Agent  
EdD Student  
Faculty of Education  
La Trobe University – Bundoora Campus  
Melbourne Victoria 3086 Australia 


Suss’s contact details have been concealed by Parliamentary staff. This is customary practice for public submissions to Australia’s parliamentary inquiries.
Part 4  Findings

This section summarizes the findings of my research into IELTS’s pedagogical design and business processes. Most data sources were collected and analyzed between September 2016 and December 2017. Analysis in this section should be read in conjunction with the appropriate Research Communique research document as shown in Appendix 2. Discussions in the relevant sub-section of this chapter refers to the relevant research communiques that complement analysis.

4.1 Business secrecy

The business model and operational processes of the IELTS exam are not transparent. This situation is purposeful – it underpins IELTS’s ruthless profit-maximization agenda. The extreme level of secrecy surrounding IELTS’s examination design and business practices are unacceptable for a high-stakes test that is owned and administered by 40 publicly-funded public institutions.

Table 10, overleaf, lists four objective facts about IELTS’s secretive business model and its corrupt examination processes.
Table 10
IELTS Secrecy: Established Facts

<table>
<thead>
<tr>
<th>Fact</th>
<th>Data references</th>
</tr>
</thead>
<tbody>
<tr>
<td>IELTS test-takers are never permitted to see examiners’ working notes unless they obtain a court order.</td>
<td>British Council (2017a);</td>
</tr>
<tr>
<td>IELTS test-takers are never permitted to see their exam content unless they obtain a court order.</td>
<td>IDP Education (2017f);</td>
</tr>
<tr>
<td>IELTS do not publish a catalogue of previous years’ examination content for public inspection.</td>
<td>IELTS (2017g)</td>
</tr>
<tr>
<td>It is not clear if IELTS strictly enforce a blind-marking assessments policy at all levels of administration.</td>
<td>IELTS Canada (2017a)</td>
</tr>
</tbody>
</table>

In recent months, IELTS have publicly claimed that they partially enforce a blind-marking policy for examination remarks. IELTS publicly claim that “Test papers are re-marked by highly skilled people who are not aware of the original marks awarded for each of the components (Writing, Reading, Listening, Speaking)” (IELTS Essentials, 2017). IELTS do not clarify if supervising managers are aware of the original scores. They also do not confirm whether IELTS staff are forbidden from referring to client’s demographic details such as their intended use of the exam.
The timing of this new development that claims partial transparency for one type of examination marking appears to coincide with global public lobbying conducted by Dr. Jericho over the past six months with regards to the issues contained in this report (see The Free School, 2017).

**Prior exam questions**

It is difficult for IELTS test-takers to refer to a fair sample of official recent IELTS exam questions to adequately prepare them for their forthcoming tests. As stated on IELTS’s official website: “These are the only IELTS practice materials endorsed by the IELTS partners” (IELTS, 2017g). This public disclosure refers to the miniscule amount of official IELTS preparation materials that are offered for sale. IELTS change their examination content for each test cycle. There are several IELTS examination cycles conducted during each calendar year.
Figure 28

Limited Selection of Official IELTS Practice Materials

Source: IELTS (2017g).

Highlight does not appear on the original webpage.

Improving IELTS

It is exceptionally difficult for independent, suitably qualified professionals such as English language linguists and pedagogy researchers to determine whether IELTS exam content is fair and free of numerous unnecessary obvious design flaws. It is also difficult for test-takers and advocates to determine whether individuals and examination cohorts have been treated fairly.
IELTS’s hyper-secrective examination procedures blatantly violates notions of procedural fairness and transparency that exists in Australia’s universities. The author of this report has been continuously employed by four Australian universities and two degree-granting educational institutions in Australia since 2007. It is common knowledge that Australia’s public universities allow a student to review their exam content, in the presence of university staff, in cases where they lodge a bona fide serious grievance with university management. Put differently, Australia’s 38 public universities offer their IELTS clients a duty of care and service that is much lower than the standards that they offer local and international students at their universities.

IELTS’ secretive examination practices are driven by commercial considerations, such as those shown in figure 28. These unfair practices do not align with notions of procedural fairness that exist in educational settings in Western countries (e.g. Canada) and most other regions.

4.2 Marketing propaganda

IELTS routinely use misleading and deceitful text and imagery to promote the commercial sale of their goods and services. The small sample of evidence that I explore for illustration purposes in this section are indicative of IELTS’s global unethical marketing practices. The independent reader may access official IELTS material via Google’s search engine (i.e. Google Images).
Figure 29 shows how IELTS grossly exaggerate the popularity of their test. The word “popular” is used to discuss sales frequencies of IELTS goods/services in the Canadian context. This bogus claim is not supported by independent marketing research that surveys customer satisfaction levels. This false claim draws on the fact that virtually all non-Canadian residents who intend to migrate to Canada must take an IELTS test if they do not live in New York City or the United Arab Emirates (UAE). Non-Canadian residents who cannot afford to travel to New York City or the UAE cannot access CELPIP’s English language testing services which are offered in a lesser range of locations inside Canada, New York City and the UAE compared to IELTS.

IELTS routinely exaggerate the popularity of their test. Three million tests do not automatically equate to three million satisfied smiling clients. It is likely that IELTS failed hundreds of thousands of skilled migrants, multiple times each during 2016. In line with IELTS’s universally secretive business practices they do not publish statistics that identify the average number of tests taken.
per individual customer. They also do not publish quantitative range performance data such as the number of customers who have taken, *e.g.*, six or more tests in the past 12 months.

**Figure 30**

IELTS Propaganda: Statistical Exaggeration

Source: British Council (2017a)

The University of Sydney, a member of the IELTS consortium, prostitutes its iconic Quadrangle to IELTS’s marketing team for profit. This image of an elite public structure aims to portray an aura of trust to IELTS’s unsuspecting fraud victims.

IELTS routinely use images of relaxed, smiling Asian and Arab youthful adults to promote the sale of their goods and services. As shown in Figure 31, University of Sydney landscapes are a favorite of IELTS’s marketing team, largely because this University’s unethical, lazy revenue generating strategies aims to live off its (fading) reputation as an established, elite institution.
Figure 31

University of Sydney: Racial Profiling Propaganda

IELTS Forum
Join and connect with other IELTS test takers

ielts.com.au

Source: IELTS Australia (2017)
Since 2010, I have met face-to-face with approximately 60 persons who have sat the IELTS test during the past 12 months. I met all 60 persons via random encounters in educational and social settings. This sample is diverse in terms of age, first language, citizenship, work experience and test location. Most of these people had failed their IELTS exams multiple times and were preparing to sit a future IELTS exam. The body language, facial expressions and explicit spoken language of these people clearly depicted one or more of: grief, stress, anxiety, despair and unhappiness when they provide a voluntary account of their experiences with IELTS’s exam content and its virtually non-existent customer service. When engaging with current and former IELTS clients online, I detect the same dominant themes when I analyze textual discussion in open-access public spaces such as IELTS chat forums and IELTS/immigration Facebook sites.

**Discrimination and racism**

Allegations that IELTS’s staff are demeaning, rude, ‘cold’ and exhibit discriminatory attitudes and racist displays towards non-white candidates abound on a mass scale on global discussion forums and other public spaces. Many examinees claim that a high percentage of IELTS examiners and examination administrators persistently act in a way that is authoritarian and intimidating. This in turn undermines their confidence and performance during their IELTS tests. Many of IELTS’s clients speculate that this treatment is deliberate. They suspect that IELTS staff act this way to maximize job security and overtime payments that arise from repeat (failed exam) sales.
These claims have persisted in the public domain for several years and are targeted overwhelmingly toward IELTS. It is exceptionally rare to see the same claims levelled towards IELTS’s competitors such as TOEFL and Pearson. Former IELTS test-takers have recounted similar stories to me in person. Figures 32 and 33 are indicative samples of these discussions as told by persons who have taken multiple IELTS exams.

Figure 32

Racist attitude of certain IELTS examiners - 2011

are unfortunately drawn by her. I seriously suspect some examiners have their dark side within. I reckon some of them are either racists or psychos who gain satisfaction by failing us innocent candidates. I am pretty sure there are that type of examiners who would give you the low mark if you are at a certain range. For example, if your speaking is at 6.5 to 7 range, a ruthless examiner could throw you a 6.5. And I have a vague feeling that syndrome tend to happen in women than men. I did a much better job when

Source: IELTS Sucks Blogsite (2011)

Figure 33

Racist attitude of certain IELTS examiners – 2017

I am writing this to express my frustrations resulted from the racist comments made by one of the examiners of the speaking test which was held on the 20th Aug 2017 in the MICT park main building located in Yangon, Myanmar. My candidate number was 001512. I was assigned to attend my speaking interview at 10:20 am and was informed to
The issue of racism among IELTS staff is the subject of Part 2 of this research series. It is evident beyond doubt that IELTS’s commercial marketing material is overwhelmingly targeted towards persons of non-white racial origins. This claim should be clear to any person who uses Google images to search for official IELTS marketing material using search words such as ‘IELTS’, ‘IDP Education’ and ‘Official’. Using targeted search words and statistical sampling methods, I estimate that IELTS’s official marketing resources portray models that are of Arab, East Asian, South Asian, African and ‘dark’ Latino appearance in no less than 90% of all images.

Fake charity

There is nothing charitable about the IELTS services offered by Cambridge Assessment, IDP Education and the British Council. As a collective, these entities accrue more than (estimated) 250 million dollars (USD) annually in economic surpluses for the sale of IELTS services and products. Most of these sales are made to citizens of developing nations.

IELTS routinely claim that they “help” people achieve their goals in their public relations communications and marketing propaganda. In this context, IELTS never mention information such as the fact that they charge test-takers a commercial fee that is equivalent to the average salary earned in one month by a Filipino nurse (Graham, 2017) for each test that their candidates sit.
IELTS’s official business partners run workshops that offer IELTS preparation instruction (IELTS, 2017g). These for-profit courses are available for purchase and do not offer volunteer ‘help’.

4.3 Pedagogical flaws

My prior research documented in Appendix 2 demonstrates the numerous obvious design flaws that persist in the IELTS exam. I can gauge these flaws by inspecting official IELTS exam preparation material published since 2006. IELTS completed its last major pedagogical review in 2005 (Taylor, 2005; Taylor & Weir, 2012). The logic that I use to discuss these flaws should be clear to a lay audience.
There is no profession or academic discipline that has sole or dominant authority to provide an assessment of the fairness or academic rigor of IELTS’s General and Academic tests. For example, one may argue that a linguist or pedagogy researcher is not qualified to comment on the many business-oriented graphical diagrams that IELTS use in writing part 1 of its Academic test.

Table 11 summarizes major and obvious pedagogical design flaws that persist throughout the IELTS exam. As discussed in the Research Communique series, these flaws are relatively easy to fix.

<table>
<thead>
<tr>
<th>Obvious design flaw</th>
<th>Research Communique</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vague assessment rubrics. Secretive assessment rubrics. Confusing assessment rubrics.</td>
<td>1</td>
</tr>
<tr>
<td>Incorporates a western-centric hidden <em>curriculum</em> that unfairly assumes the test-taker has knowledge on a vast range of topics.</td>
<td>2, 4</td>
</tr>
<tr>
<td>Assessment structure is stubbornly rigid and therefore lacks authenticity.</td>
<td>4</td>
</tr>
<tr>
<td>Correct answers may earn a score of zero for listening tests.</td>
<td>7</td>
</tr>
<tr>
<td>Listening test simultaneously co-examines a candidate’s reading, writing, spelling and visual cognitive processing skills.</td>
<td>7</td>
</tr>
<tr>
<td>Miniscule spelling errors earn a score of zero for the listening test.</td>
<td>7</td>
</tr>
<tr>
<td>Speaking tests incorporates irrelevant premises and assumptions into the exam content.</td>
<td>4</td>
</tr>
<tr>
<td>Sequencing errors exist in speaking exam content.</td>
<td>4</td>
</tr>
<tr>
<td>There is no syllabus or <em>curriculum</em> document to guide each examination cycle.</td>
<td>2, 4</td>
</tr>
</tbody>
</table>
IELTS’s web pages proudly boast that highly qualified academics and researchers design and pretest exam content. Figure 35 is an example of such a claim.

**Figure 35**

**IELTS Examination Design**

[Image](https://www.ielts.org/teaching-and-research/research-reports)

Leading academics and researchers worldwide contribute to the continued development and improvement of the IELTS test.

Below you can access articles from the three publications produced by the IELTS partners - IELTS Research Reports, Studies in English Language Testing (SiLT) and Research Notes.

IELTS partners offer a range of grants, fellowships and awards in the fields of linguistics and language education. Applications for research grants are open from April to June each year.

[→ Apply for an IELTS Research Grant](https://www.ielts.org/teaching-and-research/research-reports)

Source: IELTS (2017h)

I argue that IELTS purposefully include numerous, avoidable structural and content flaws in their examinations to set a high percentage of test-takers up to fail. This notably include those who aim to earn a skilled migrant visa. This demographic requires higher IELTS scores on average than unskilled workers and international students. IELTS hire and publicly showcase the most qualified educators that billions of dollars of revenues earned per decade can buy. Moreover, its direct ownership by ranked universities that instruct in the English language is a fact. There is no other logical reason that can account for the blatant gross negligence demonstrated in the public domain of IELTS’s pedagogical structures, examination content and examination process.
4.4 Fraudulent profiteering

This section argues that it is obvious that IELTS’s senior examiners willfully and persistently coordinate global systemic examiner fraud to maximize total revenue and economic surpluses. Moreover, this criminal behavior is sanctioned and coordinated by IELTS’s head office.

I conservatively estimate that:

- Total revenues earned from fraud over the past two decades exceed USD$1 billion;
- This fraud is systemic – it occurs in all continents and test centers.

The claims that I discuss in this section are the most serious allegations that I put forward in this document. I draw on my extended research and personal experiences in educational settings over the past seven years. I do not make these claims recklessly. There is an abundance of evidence available in the public domain to support the claims that I discuss in this section.

Candidate profiling

IELTS collect more personal demographic client data than any other English language testing agency. This personal data is used by IELTS to ensure that it does not award too many test-takers a set of scores that will qualify them for skilled migration to Australia and Canada. IELTS regard -
Australia and Canada as their host customers, especially Canada, which offers IELTS regional monopoly status to support its English language testing skilled migration regime in 139 countries.

Table 12 shows how IELTS collect significantly more private data than its major competitors: Pearson, TOEFL and TOEIC.

<table>
<thead>
<tr>
<th>Mandatory data IELTS’s application form</th>
<th>TOEFL</th>
<th>TOEIC</th>
<th>Pearson</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Gender</td>
<td>Optional</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Country of nationality</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>First language</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Occupation (sector)</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Occupation (level)</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Why are you taking the test?</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>If other, please specify</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Which country are you applying to/intending to go to?</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Where are you currently studying English (if applicable)?</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>What level of education have you completed?</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>How many years have you been studying English?</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
</tbody>
</table>

IELTS cannot argue that it collects this data for statistical research purposes. As a condition of enrolment, IELTS’s application form dictates that clients must provide all data shown in Figure 36 as a condition of registration. Figure 36 provides primary evidence to support this claim.

Figure 36
IELTS Refuse to Register Applicants Who Withhold Irrelevant Data

Furthermore, IELTS use the fear of future results cancellation to ensure that each candidate does not choose to withhold irrelevant personal demographic data. IELTS reserve the right to cancel any client’s Test Report Form merely because they did not provide correct details for irrelevant private demographic data such as “Why are you taking the [IELTS] test”.

Figure 37
IELTS May Cancel Results for Clients Who Withheld Irrelevant Data

Source: IELTS (2017c)
IELTS’s application form repeatedly warns candidates that they may cancel their Test Report Form if they are suspected of engaging in “malpractice”. IELTS do not define this term. It is fair to assume that IELTS defines this term to include a candidate withholding private demographic data (e.g. by offering proxy data). Cancellation may occur even if this data is of no consequence to IELTS’s ability to identify a candidate for security integrity purposes or to award this candidate a fair set of performance scores for their test.

Figure 38

IELTS Do Not Define the Term ‘Malpractice’

If IELTS aim to analyze the demographics of their test-takers, they can request that irrelevant private information be provided on a voluntary basis. IELTS can use statistical sampling to extrapolate this data to reflect the population makeup. IELTS do not follow this standard business practice as they harbor secretive, unethical (criminal) motives for dictating that all clients must offer a complete description of their demographic background and intended use of the exam.
Offshore marking

IELTS send assessments to India for examination and pay examiners *circa* AUD$3 for each examination that they mark.

**Figure 39**

IELTS Send Exams to India for Fraudulent Marking

IELTS send exams to India to maximize massive economic surpluses and to avoid detection for fraud crimes by domestic police services in Western nations such as Australia and Canada.

Slow examination process

The slowness of the IELTS examination process is notorious among IELTS test-takers, especially among the many unfortunate persons who have been required to sit multiple IELTS examinations (*e.g.* IELTS Liz, 2016; Magoosh, 2017b). Based on statistical sampling techniques, I estimate that IELTS do not meet their self-defined service charter for examination results reporting, *i.e.* 13 days (British Council 2017,) for no less than one quarter of their examination cycles.
In line with IELTS’s universally secretive business practices, IELTS do not provide their candidates with a specific reason to explain why the release of their exam performance scores have been delayed. IELTS provide their clients with a generic response such as the email content shown in Figure 40.

**Figure 40**

**Generic Late Results Notification**

![Notification of Investigation of IELTS Test Result](image)

Source: Magoosh (2017b)
Figure 41 shows that Magoosh (2017b, NP) report that “more and more” they are hearing feedback that IELTS results are delayed or withheld. This feedback is consistent with other primary and secondary data sources that I use to triangulate inferences drawn in this section.

**Figure 41**

**High Frequency of IELTS Exam Results Delays and Cancellations**

[Link to Magoosh article](https://magoosh.com/ielts/why-were-my-ielts-results-withheld/)

Why were my IELTS results withheld?

*BY GWENDOLYN ON JULY 27, 2016 IN IELTS SCORES*

There is nothing more frustrating than **studying really hard** for an exam, taking a test, waiting for your **IELTS to be graded**, and then not getting your score when you are supposed to. More and more, I have heard of reports of candidates having their IELTS results withheld. Unfortunately in certain circumstances, test results may be withheld for longer than the usual period of 13 days. But why?

Let’s look at three likely reasons why your IELTS results were withheld.

Source: Magoosh (2017b)

Magoosh are one of the largest independent providers of commercial IELTS preparation resources and coaching services and their customer base and operations are global. Magoosh are suitably placed to provide accurate commentary on exam processes and scores as reported to their staff by their massive international client base.
**Failure without justification**

IELTS reserve the right to award a score of zero to any candidate for any or all four language skills taken in the same test. This reservation applies even in cases where the examinee’s answer is ostensibly deserved of being awarded a perfect score of band 9 for content quality.

Cambridge Assessment research academic Chris Bell (2015) confirms that Cambridge use “statistical malpractice detection” techniques to ‘detect’ cheating. This approach is akin to using artificial intelligence software to prove a crime for a high-stakes test. As noted by Pell (2015, p. 34), “it is impossible to completely eliminate the highlighting of false positives”. In other words, it is near-certain that Cambridge Assessment rely on statistical data to unfairly fail and extract more revenue from multiple clients. One example of this absurd approach that Cambridge uses is “Similarity of response patterns between two or more candidates” (Pell, 2015, p. 33).

There are numerous legitimate reasons that may explain why honest candidates may offer identical responses such as multiple-choice selections during the reading test. For example, two candidates who sit the same IELTS exam may produce identical or near-identical examination responses because they are siblings who live together and prepared for the exam as study partners using the same preparation resources. IELTS reserve the right to award these siblings a score of zero, without justification, merely because they *suspect* that they cheated.
Table 13 outlines four scenarios where a candidate may be awarded a score of zero, without receiving specific justification from IELTS. I support each claim with primary evidence extracted from a current IELTS policy document.

**Table 13**

**IELTS May Award Scores of Zero for ‘Perfect’ Answers**

<table>
<thead>
<tr>
<th>A score of zero may be awarded if</th>
<th>Sample authorities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Examiners merely suspect that a candidate has memorized an answer.</td>
<td>IELTS (2017c; 2017d; 2017e) Per Research Communique 1, p. 126</td>
</tr>
<tr>
<td>An unrelated candidate in the same test room cheated and this did not impact others in the room.</td>
<td>Assessment rubrics (writing/speaking)</td>
</tr>
<tr>
<td>A candidate’s scores increase rapidly in comparison to prior tests.</td>
<td>IELTS (2017c)</td>
</tr>
<tr>
<td>A candidate achieves a very high band score for one or more language skills and receives a very low score for one or more different language skills taken in the same test cycle.</td>
<td></td>
</tr>
</tbody>
</table>

Extracts from two policy documents listed in Table 13 are shown in the two figures below.

**Figure 42**

**Suspected Totally Memorized Responses**

Source: British Council (2017i)
Cambridge Assessment Group research academic Chris Bell (2015, p. 31) confirms that the word “malpractice” is synonymous to “cheating” in the context of Cambridge Assessments.

IELTS’s ‘zero band score’ assessment policy is impractical. For example, a candidate who scores 8.0 (very good user) for writing may score e.g. 4.0 for speaking (limited user) because the demeanor of the examiner intimidated them. Alternatively, they may score 4.0 because they were intimidated by the nature of the speaking topics put forward by the examiner.

IELTS reserve the right to award a score of zero merely because they suspect that an answer that is relevant and technically flawless was memorized. My examination of public evidence concludes that IELTS never provide proof that an answer was “totally memorized”.

Source: IELTS (2017c)
IELTS prefer to footnote their reserve powers to award a score of zero for so-called totally memorized responses by listing this as a brief bullet point in the public version of their non-transparent assessment rubrics. As shown in Figure 44, IELTS’s business partners never publish this reserve power when they summarize their Band score system on their main web pages and their public-issue marketing brochures.

**Figure 44**

**IELTS Materials Avoid Discussing Memorized Responses**

Source: Cambridge English (2017d)

<table>
<thead>
<tr>
<th>Band 1: Non-user</th>
<th>Essentially has no ability to use the language beyond possibly a few isolated words.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Band 0: Did not attempt the test</td>
<td>No assessable information provided.</td>
</tr>
</tbody>
</table>

A half band score indicates a strong performance at a particular band level. For example, if you score an overall band score of 6.5, you have performed strongly within the Band 6 level.

Source: Cambridge English (2017d)

IELTS’s policy that allows it to award scores of zero, without providing proof or detailed justification is consistent with IELTS’s unconscionable rent-seeking top-down corporate culture. IELTS’s Executive leaderships places rent-gouging profit maximization as a core objective and marginalizes issues such as fairness, legal compliance, accountability, customer service and pedagogical excellence. IELTS take the liberty to award scores of zero, without providing reasonable justification, because they have no hesitation in abusing their unrivalled market power at all stages during their exam design cycle and business administration processes.
Cancellation of Test Report Forms

IELTS reserve the right to cancel any candidate’s Test Report Form at any point in time, without offering a refund or specific justification to explain their reasons for this action. IELTS rely on Clause 13 of their application form to defend this practice. IELTS may cancel a Test Report Form if they merely suspect “malpractice” or that the results are “unreliable”.

Figure 45
IELTS Reserve the Right to Cancel any Test Report Form

https://www.ielts.org/-/media/pdfs/application-form.pdf

13. I understand that the IELTS Test Partners have a responsibility to all candidates and Recognising Organisations to ensure the highest confidence in the accuracy and integrity of test results and that the IELTS Test Partners therefore reserve the right to withhold test results temporarily or permanently, or to cancel test results which have been issued, if they consider those results to be unreliable for reasons of suspected malpractice or any other irregularity in the test process.

Source: IELTS (2017c)

As confirmed by Cambridge Assessment researcher Chris Bell, the word “unreliable” may refer to statistical calculations about a candidate’s performance as opposed to objective human observations of foul play such as cheating (Bell, 2015). Put differently, IELTS can and do cancel certain clients’ Test Report Forms merely because they are suspected of cheating. The testimony shown in Figure 46, overleaf, is typical of numerous accounts that exist in the public domain.
IELTS does not automatically ban all candidates from sitting future IELTS tests in cases where they have been awarded a score of zero under the auspices of the provisions outlined in Table 13. This strange policy is open to abuse. IELTS’s branches may seek to maintain a regular cash flow of repeat local clients to fund fixed costs such as permanent staff levels and rental of premises.
How the IELTS immigration scam works

IELTS’s application form dictates that all registrants must inform IELTS why they are taking the test. Figure 47 is evidence of this intrusive, unnecessary policy.

Figure 47
IELTS’s Intrusive Deceitful Mandatory Data Collection Regime

After the exams are graded, IELTS’s senior supervising examiners reduce ‘raw’ marks to ensure that only a very small percentage of test-takers may receive bonus points for immigration to Canada and Australia. Per Canada’s and Australia’s immigration laws, candidates must receive all minimum band scores for all four language skills taken on the same test. Most skilled visa applicants and permanent residency visa applicants require band scores of 7.0 minimum for all four English language skills, i.e. – reading, writing, listening and speaking.

IELTS’s senior supervising examiners routinely round down raw achievement scores for writing and speaking as these skills are assessed subjectively. Candidate’s exam content and examiners’ working notes are never made public.
Figure 48 is indicative of score patterns reported by IELTS test-takers in recent years who could not achieve four scores of 7.0 or higher on the same test. Using statistical sampling techniques, I conservatively estimate that IELTS have defrauded at least 100,000 persons annually, multiple times each over the past decade by awarding repeat score patterns typical of those in Figure 48.

**Figure 48**  
**IELTS: Repeat Fake 6.5 Fail Scores for Writing and Speaking**

<table>
<thead>
<tr>
<th>Skill</th>
<th>Test 1</th>
<th>Test 2</th>
<th>Test 3</th>
<th>Test 4</th>
<th>Test 5</th>
<th>Test 6 etc.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reading</td>
<td>8.5</td>
<td>8.5</td>
<td>8.5</td>
<td>8.5</td>
<td>8.5</td>
<td>8.5</td>
</tr>
<tr>
<td>Writing</td>
<td>8.5</td>
<td><strong>6.5</strong></td>
<td>8.5</td>
<td><strong>6.5</strong></td>
<td>8.5</td>
<td><strong>6.5</strong></td>
</tr>
<tr>
<td>Listening</td>
<td>8.5</td>
<td>8.5</td>
<td>8.5</td>
<td>8.5</td>
<td>8.5</td>
<td>8.5</td>
</tr>
<tr>
<td>Speaking</td>
<td><strong>6.5</strong></td>
<td>8.5</td>
<td><strong>6.5</strong></td>
<td>8.5</td>
<td><strong>6.5</strong></td>
<td>8.5</td>
</tr>
</tbody>
</table>

Scores show in red font are fake fail scores that have been scaled down via examiner fraud.

IELTS alternate their fake fail scores across different exam/skill combinations to offer test-takers false hope they may eventually be able to earn a score of 7.0 or higher for all language skills taken on the same test. This willful deception ensures that IELTS’s many unsuspecting fraud victims purchase numerous exam services (and commercial support resources such as books) before they realize that IELTS have secretly profiled them as a candidate who is not suitable for immigration to Australia, Canada or another in-demand destination for migrants (e.g. Britain).
Exam fraud: international students

Opportunistic IELTS examiner fraud is also perpetrated against future international students. IELTS test-takers consistently report that they immediately receive higher (i.e. accurate) scores for their reading, writing, listening and speaking skills when they abandon IELTS and switch to other providers such as TOEFL (e.g. Expat Forum, 2015). IELTS’s clients report receiving marginal fail scores that alternate between language skills and tests, such as the pattern in Figure 48.

IELTS encourage international students to advise them what faculty and institution they aim to access. Using Google searches, IELTS examiners can determine test scores that an international student requires to pass. IELTS examiners are more likely to offer fake marginal fail scores to test-takers who fit a certain demographic. These may include those who live in wealthy post-codes and those who live in a region where there is no Pearson, TOEFL or TOIEC test center in proximity.

Figure 49
IELTS selective profiling: international student visa applicants
The testimony shown in Figure 50 is similar to thousands of testimonies that I have randomly encountered when researching IELTS since 2016. Using statistical sampling, I estimate that in excess of 100,000 verifiable similar accounts exist. This test-taker is a mature-age (30s) immigrant from South Africa who consistently records perfect (average) band scores of 9.0 for speaking.

“I want to emigrate to Australia and I needed to score a minimum of “8” (IELTS) or 79 (PTE-A) in each module respectively (Listening, Reading, Writing and Speaking).” (Poms in Oz, 2015).

**Figure 50**

Test takers who abandon IELTS pass Pearson on their first attempt

IELTS’s supervising examiners have profiled this test-taker’s registration form and note that he requires a score of 8.0 for all language skills taken on the same test. IELTS award fake scores of 7.0 and 7.5 for writing when this test-taker scores 8.0 or higher for other language skills during the same test. IELTS award this test-taker a score of 8.0 for writing when he scores 7.0 and 7.5 for reading. IELTS’s staff anticipate that this test taker will purchase more IELTS test services. This wide variation between test scores is normal for IELTS. Pearson and TOEFL are much more stable.
**Slow marking**

In its 2016/2017 Annual Report, IDP Education (2017b, p. 27) reports that slow examination reporting turnaround is a problematic business issue that is worth reporting to its shareholders.

**Figure 51**

**Examiner Fraud Slows Down IELTS’s Assessment Process**

Source: IDP Education (2017b, p. 27)

The core reason why IELTS is the slowest high-stakes English language test to assess is because IELTS’ senior supervising examiners use statistical scaling and examination fraud to reduce raw achievement examination marks. This fraudulent process adds an additional layer of work to IELTS’s corrupt examination process above the layers offered by reputable competitors. Other language testing agencies such as Pearson, TOEFL and TOEIC are not known for conducting these massive fraudulent processes as they do not work as covert proxy agents for Canada’s and Australia’s immigration regime to secure favorable business terms with these governments.

IELTS’s supervising examiners reduce raw marks to ensure that only a very small percentage of test-takers may receive bonus points for immigration to Australia, Canada and the United Kingdom. The Governments of these countries offer IELTS highly favorable business conditions
(via regulation and policy) and immunity from prosecution domestically and offshore diplomatic support. These Governments rely on IELTS examination fraud to expel most international students from their countries after they graduate and are no longer profitable to exploit. IELTS offer these governments exam fraud to support these Governments’ restrictive immigration policies in return for generous revenue maximizing gestures.

**Dr. Jericho et al.**

Claims made in this report are supported by thousands of individuals from a range of professions. These professions include educators, judicial officers, journalists and migration agents.

**Tutors**

As a practicing volunteer IELTS tutor, I conclude that many and possibly most IELTS tutors are aware of the IELTS scam. My colleagues report that they repeatedly see their students earning scores of 6.5 for speaking and writing. These scores are much lower than scores that they consistently earn in mock examinations, as assessed by experienced, qualified IELTS tutors.

Many IELTS tutors without investigative research backgrounds hold a simplified, partially correct view of the IELTS scam. They regard IELTS as a *quota* system that only offers four band scores of 7.0 or higher to the top *circa* 10% of test-takers to control migration. In other words, they accept
that IELTS adjust raw exam scores and reduce a score of e.g. 7.5 for writing to 6.5 if that candidate is not deemed to be in the top \textit{circa} 10\% of test-takers during that examination cycle.

**Figure 52**

IELTS Scam is Common Knowledge among IELTS Tutors

In 2011, an Australian Federal Court Judge commented that the IELTS test is not an accurate predictor of a person’s ability to use functional English in a high-stakes professional setting such as a court room. A candidate who could not score band scores of 5.0 (modest user) for all language skills (taken on the same test), to earn an unskilled worker’s visa, was able to defend himself in court. This test-taker applied his reading, writing, listening and speaking English
language skills to prepare for the hearing and to defend his case in the courtroom. This judge had no difficulty following the arguments put forward by this man.

Figure 53
Australian Judge Expresses Concerns about IELTS’s Reliability

Judges air concerns about English tests in visa cases

BERNARD LANE
TheAustralian | 12:00AM July 13, 2011

THE Federal Court has seized on the use of English language tests by immigration authorities as potentially unfair.

In a decision this month involving an Indian-born graduate from the University of New England, Justice Nye Perram said the court had noticed something puzzling in a number of cases.

... Lower part of article

Mr Mohamad had taken 18 IELTS tests. For his visa he needed a score of at least five in each of the speaking, listening, reading and writing components.

He had attained that score in each component -- but never in the one test.

Source: The Australian (2011)
Media

Australia’s respected, independent, not-for-profit media are aware of IELTS’s massive scam processes. Figure 54 is an example of a print media story that reports IELTS’s universal pattern of repeatedly failing skilled visa applicants by the narrowest margin (0.5) for writing (i.e. band 6.5).

Figure 54
IELTS Fail an Indian Woman with 2 Australian Masters Degrees 21 Times

Source: Special Broadcast Service (2017)

For legal reasons, the global media have restricted their reporting to the facts of the case and allow their audience to draw their own conclusions. For example, The Irish News reported a claim by Richard Coates that around 90% of all Irish citizens who sit the IELTS test fail at least once.
Members of the IELTS consortium are aggressively litigious towards any organization that dares to discuss any details of their blatant exam frauds and human rights crimes in the public domain.

IELTS fraud victim Neha paid IELTS commercial fees to receive feedback to ascertain why IELTS’s examiners continuously failed her for half one band score for writing. I refer to figure 56.

Source: Special Broadcasting Service (2017)
IELTS informed Neha that she was repeatedly receiving scores of 6.0 and 6.5 out of 9.0 because of “a little bit of punctuation” errors (Neha, cited in Special Broadcasting Service, 2017). Neha’s experience is indicative of how IELTS routinely award fake marginal fail scores for its subjective writing assessment to cull skilled migration eligibility for the Australian and Canadian Governments. IELTS simultaneously extorts massive financial surpluses from global exam fraud.

**Scholars**

The dual-purpose scam objective of the IELTS exam has been common knowledge for several years among independent research scholars that specialize in IELTS (e.g. Ahern, 2009; Al-Issa, 2016). A journal article published by Sarah Ahern (2009, Abstract) reports how the Australian Government uses IELTS as “a means of controlling immigration”.

Abstract: IELTS (International English Language Testing System) is the test used to assess the English language skills of international students, and an integral component of the trade in education services in Australia. Originally designed to assess language skills appropriate for tertiary study, IELTS has since acquired other functions. Primarily, as a result of government policy decisions, it has become a dual-purpose test: both a test of English language abilities and a means of controlling immigration. In this paper, I argue that these purposes are mutually incompatible and that this link has significant implications for stakeholders. In building this argument I begin by tracing the changing functions of the test, and the role of government policy in these changes. I then explore the impact of policy decisions in education and immigration on stakeholders, principally students and teachers. Through an analysis of an incident in an IELTS preparation class, in the course of a research project conducted at my workplace, an English language college in Sydney, I examine the ways in which the dual purposes of the test impact in the classroom and the implications they have for these stakeholders.
4.5 Racketeering and extortion

I argue that IELTS’s business activities and policies are tantamount to racketeering and extortion crimes as defined in most nations’ legal jurisdictions. They also violate international law. IDP Education, University of Cambridge and the British Council are publicly owned/controlled bodies. It is imperative that these institutions act with compassion and set the highest standards of ethical behavior. At present, they fall far short of these moral standards.

Market power

When determining what is a business racket and extortionate business practices, the courts take context into consideration. This includes an assessment of the market power of the vendor and their customer/s. They also consider the market structures of where the business conducts its operations.

Prior to 5 November 2011 and 21 November 2016 IELTS enjoyed a highly lucrative virtual monopoly for conducting English language tests for those who sought to immigrate to Australia and New Zealand respectively (Australian Government, 2013; New Zealand Government, 2017). In 2017, persons who seek to take an English language test outside of Canada, New York City and the United Arab Emirates (where CELPIP conduct tests) to obtain a skilled worker or permanent residency visa for Canada must purchase their English language test services from IELTS.
IELTS enjoys an *absolute regional monopoly* for supporting the Canadian Government’s skilled visa program in 139 countries. My research concludes that IELTS’s global financial crimes are most ruthless and profitable in massive markets such as India, the Middle East and China where there is no competition. In economists’ terms, IELTS’s predatory business practices portrays the classic hallmark traits of the unconscionable, opportunistic, profit-maximizing, lazy monopoly. The blatant neglect and contempt that IELTS’s so-called customer service team openly portrays towards their customers is consistent with this model (e.g. National Consumer Complaint Forum India, 2017). In lay person terms, IELTS ruthlessly exploits the “test-takers need us more than we need them” privileged customer relationship that it enjoys in 139 national monopoly markets.

IELTS are aware of their colossal global market power. Numerous country-specific websites owned by IDP Education, Cambridge English and the British Council proudly boast that IELTS is the world’s most ‘popular’ English language test. IELTS routinely boasts that it maintains around 1,100 test centers in over 140 countries. Figure 57 offers an example of these websites.
Vulnerable demographic

Most people who aim to immigrate to Canada are citizens of developing nations or economies in transition. These persons are classifiable as ‘economic migrants’. This demographic is vulnerable
to exploitation when they enter the market place to purchase goods and services to support their application to immigrate to an advanced developed capitalist economy such as Canada (e.g. United Nations, 2017c).

**Extortion**

IELTS’s business practices are extortionate and unconscionable. As context, I draw on a news article published by the Australian Broadcasting Corporation (ABC). The ABC is a respected, not-for-profit public institution. In an article dated 2015, this news agency uses a sub-header to make prominent a quote from an IELTS test-taker from the Irish Republic who has repeatedly failed his IELTS exam by a narrow margin. The native language of this IELTS test-taker is English and he requires IELTS scores for immigration purposes.

In his interview with the ABC, this Paralympian states that the IELTS “test is, ‘almost like extortion’”. Figure 58, overleaf, documents this claim. It is exceptionally rare for the ABC to use such confronting accusatory language. The ABC has the authority to quote or omit any statements provided by interviewees. I strongly suspect that the word ‘almost’ was inserted by ABC’s editors on the advice of their legal team to avoid a lawsuit and for no other purpose.
I argue that multiple revenue-generating (i.e. revenue maximizing) business practices administered by IELTS are blatant cases of criminal extortion.

Table 14, overleaf, summarizes these business practices and supports these claims with a description of the logic that I use to draw these conclusions. I also offer a current primary source to support all claims.
### Table 14

**Context of IELTS’s Business Practices: Extortion**

<table>
<thead>
<tr>
<th>Business practice</th>
<th>Primary reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Test-takers who wish to check that there is no clerical error on their</td>
<td>Cambridge English (2017a);</td>
</tr>
<tr>
<td>Test Report Forum must pay to have their full exam remarked.</td>
<td>IELTS Canada (2017a)</td>
</tr>
<tr>
<td>Candidates must pay to have all sections of their reading, writing,</td>
<td>IELTS Canada (2017a)</td>
</tr>
<tr>
<td>listening and speaking test remarked even if they wish to obtain a remark for</td>
<td></td>
</tr>
<tr>
<td>one component of one skill such as ‘writing task 1’.</td>
<td></td>
</tr>
<tr>
<td>IELTS refuse to validate their Test Report Forms after two years.</td>
<td>IDP Education (2017e)</td>
</tr>
</tbody>
</table>

It is beyond the scope of Part 1 of this report to provide a legal assessment for all 142 countries where IELTS ply their trade. IELTS operate in more than 200 state/territory, provincial and national jurisdictions that have enacted consumer protection legislation.
Illustration Vignette: Criminal extortion via poor customer service

This common real-life scenario is typical of how IELTS earn tens of millions of dollars every year from its profit-generating extortionate appeals process.

Fatima has invested most of her life savings to sit one IELTS test so that she can migrate to Canada as a skilled worker. She is eligible for this visa, subject to passing her IELTS test.

Fatima receives scores of: 8.0 listening, 8.0 speaking, 8.0 reading and 6.5 for writing for her IELTS academic test. Fatima is surprised by this score of 6.5 as writing is her strongest skills and her IELTS-TESOL qualified coaches routinely award her scores of 8.5 for writing under exam conditions. She is convinced that she ‘aced’ this section of the IELTS exam.

Fatima is convinced that the score of 6.5 must be an innocent typographical error. She telephones the local IELTS support hotline in Dubai and this number always diverts to the voicemail. Fatima explains her story multiple times and her calls are never returned.

Fatima visits the IELTS office in Dubai and asks staff to check that her score of 6.5 is not a data-entry clerical error. The customer service support clerk explains to Fatima that they will not action her request unless she pays USD$150 for an Enquiry on Results service. This profit-generating process involves payment for a full remark of all sections of Fatima’s exam even though she does not require this service.

This illustration vignette is not theoretical. IELTS staff routinely ignore messages left via their local customer service number (e.g. Magoosh, 2017b). There is ample evidence available from public testimonies that IELTS use its appeals (remarking) process to deliberately extort further profits from the (estimated) hundreds of thousands of people which it has repeatedly failed using fake marginal fail scores of 6.5 for its subjective speaking and writing examination content.
Racketeering

The IELTS consortium willfully and persistently exploits its global market power to create fake profit-maximizing services that it imposes on a vulnerable demographic. Moreover, it does so, on a global scale, to extract maximum monopoly rents (i.e. revenue/profit).

Candidates such as ‘Fatima’ (on the previous page) are unable to pay a reduced fee to have a minor service performed such as a clerical check or a remark of one sub-section of the IELTS exam (e.g. writing part 1) or one language skill such as speaking. The fee payable to IELTS for an Enquiry on Results is always equivalent to the cost of having a candidate’s reading, writing, listening and speaking skills fully remarked. Figure 59 supports this claim.

Figure 59
IELTS Charge a Full Exam Remark to Check One Sub-section

IELTS Enquiry on Results Form

Notes for candidates on the submission of Enquiries on Results (EOR)

1 You can choose to undertake an Enquiry on Results, which means having your IELTS test re-remarked.
   You must make this request within six weeks of your test date. Your test will be sent to Australia or England for re-marking by Senior Examiners.

2 You can choose to have one or more parts of your test re-remarked. The fee is the same regardless.

3 The re-mark fee is £60 per candidate for British Council centres and AUD $160 for IDP: IELTS centres plus GST in Australia. You will receive a full refund if your result is changed to a higher band score.

5 The re-mark is done by trained Clerical Markers and senior examiners employed by the British Council and IDP: IA.

6 British Council/IDP: IA Head Office will usually notify your test centre of the re-mark result within six to eight weeks of receipt of your exam materials.

7 You will receive an EOR letter stating your final result status. You should make all enquiries regarding the progress of your re-mark to your original test centre.

Source: University College Dublin IELTS Test Center
This exam remark policy and *modus operandi* fits the definition of ‘racketeering’ in most nations’ jurisdictions. IELTS willfully target a vulnerable demographic and exploit their colossal market power to enforce a fake, unnecessary service that it repeatedly imposes on its clients to earn millions of dollars in revenue and profit each calendar year.

My research investigations cause me to conclude that no more than 1% of Enquiry on Results applications lead to an increase in a test score for one or more language skills. English language tutor and volunteer IELTS consumer rights advocate Leon Burger has been working with current IELTS test-takers and former IELTS test-takers for several years. As shown in Figure 60, Burger reports that he is not aware of a successful outcome from an Enquiry on Results application.

**Figure 60**

*Successful Enquiry on Applications are Exceptionally Rare*

Source: Complain about IELTS (2017)

Furthermore, as reported by IELTS instructor ‘Sean’, from Magoosh (2017a), IELTS appeals are expensive and rarely result in an increase in scores. Figure 61, overleaf, captures this claim.
Figure 61

Access to IELTS’s Appeal Process is ‘expensive’

https://magoosh.com/ielts/how-often-are-requests-for-an-ielts-rescore-successful/

If you are thinking about whether you should get your IELTS test rescored, you might wonder how often these requests actually work, and result in a better score. The answer is that changes to your IELTS score do happen. However, an increase of a band or more is rare, and it almost never happens on the Listening or Reading sections of the exam. Additionally, the Enquiry on Results process takes a long time, and is expensive.

At the end of the day, the decision of whether to apply for a rescore is personal, and while this post will give you information on how the rescore process works, the ultimate decision is up to you!

Source: Magoosh (2017a)

IELTS do not administer a customer grievances service or appeals process that is accessible to former clients who are penniless or cannot afford the fee to lodge a complaint.

Figure 62

Enquiry on Results Racket is Common Knowledge among IELTS tutors

You should never have to pay to complain.

Source: Complain about IELTS (2017)
The spirit of IELTS’s appeals, remarking and so-called customer service support is consistent with the unconscionable, criminal profiteering culture that underpins the goal of this corrupt entity.

**Expiry date of Test Report Forms**

IELTS validate a Test Report Form for a maximum of two years. This extortionate practice earns IELTS approximately (estimated) USD one billion dollars in revenue each decade. Most persons affected by the two-year expiry date of the Test Report Form are international students. Figure 63 illustrates the very high cost that IELTS willfully imposes on most of these fraud victims.

**Figure 63**

**Two Year Expiry Date of Test Report Forms: Extortion Example**

A candidate sits one IELTS test in India to study at an Australian university in 2011.

IDP Education (India) award this Indian candidate a fair test score as they want this candidate to pay their tuition fees to a public Australian university to maximize the revenues of IDP Education’s owners (Australia’s 38 public universities).

The Candidate from India graduates with a B.Com from Macquarie University in 2014 and is eligible for skilled migration to Canada. Per Canada’s immigration law, she is required to take another IELTS test to migrate to Canada.

The IELTS test center at Monash University profile the candidate’s application form and note that she is a currently employed senior management professional based in Australia. To slow down immigration to Canada and to maximize profits, Monash University IELTS test center determines in advance that this candidate will be awarded fake 6.5 fail scores for writing and speaking for the first 14 IELTS tests.
IELTS purposefully cancel Test Report Forms after two years so that they can use the re-examination cycle to extort more profits from international students who require a fresh test for immigration purposes after they graduate. The bulk of IELTS’s exam frauds are targeted towards young economic migrants from developing nations who are desperate to secure a better life.

IELTS claim that they do not validate Test Report Forms indefinitely because they cannot guarantee that a candidate’s English language skills are at the same level two years after the exam date. This claim is false. Cambridge English test certificates (which are not related to IELTS) do not expire and may be used for migration and professional registration purposes.

Figure 64
Cambridge English Test Results Never Expire

https://support.cambridgeenglish.org/hc/en-gb/articles/202838296-How-long-are-my-results-and-certificate-valid-for

Information for candidates who have taken a Cambridge English exam

Your Cambridge English exam result/certificate does not have an expiry date*. It shows that on a particular date you demonstrated language skills at a specified level, however, language skills are known to diminish over time if not used and maintained.

Individual institutions (such as universities, employers, professional organisations and government bodies) can choose how long to accept results for. Some institutions will only accept certificates taken within the last 2 or 3 years, although many will take into account evidence that you have taken action to maintain or improve your level of English since taking your exam. Please speak to the institution that you wish to apply to if you have any doubts.

Source: Cambridge English (2017e)
IELTS’s rationale for cancelling Test Report Forms after two years is a sham for three additional reasons. Firstly, IELTS could allow the market (i.e. Test Report Form users) to determine if they accept Test Report Forms that are older than two years. Secondly, most international students’ English language levels continuously improve as they progress through their degree course e.g. in Australia. Thirdly, the University of Cambridge and Australia’s public universities validate Graduate Awards indefinitely. For example, a Doctor of Medicine Degree and a Master of Linguistics Degree remains perpetually valid at these universities.

The University of Cambridge and IDP Education cynically profiteer to their maximum advantage from a highly vulnerable demographic. These entities know that most IELTS clients fit the pattern shown in figure 63. These economic migrants are desperate to secure a work and/or residency visa for Australia, New Zealand, Britain and Canada. This youthful demographic, who are mostly citizens of developing nations, are very easy and highly profitable to defraud.

4.6 Human trafficking

The United Nations (2017b) definition of human trafficking states that:

Article 3, paragraph (a) of the Protocol to Prevent, Suppress and Punish Trafficking in Persons defines Trafficking in Persons as the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs.

IELTS’s nation-state-sponsors should be prosecuted under the jurisdiction of the International Court of Justice for willfully orchestrating human trafficking crimes on a massive global scale.
These sovereign states notably include Canada, Australia and the United Kingdom. Figure 65 shows that there are three elements to human trafficking crimes (UN, 2017b).

**Figure 65**

**Three elements of human trafficking crimes**

![Three elements of human trafficking crimes](image)

Source: United Nations (2017b)

My research concludes that the collaborative activities of IELTS and its sponsors meet the three criteria of human trafficking. Table 15 summarizes the logic that underpins this conclusion.

**Table 15:**

<table>
<thead>
<tr>
<th>Element</th>
<th>Explanation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Act</td>
<td>Recruitment of post-secondary education students under false pretenses.</td>
</tr>
<tr>
<td>Means</td>
<td>Fraud, deception, abuse of power and vulnerability.</td>
</tr>
<tr>
<td>Purpose</td>
<td>Exploitation: slavery and other types of exploitation (<em>i.e.</em> financial).</td>
</tr>
</tbody>
</table>
Figure 66
Canadian and Australian Governments: Human Trafficking Model

**Act:** Recruitment

Canadian and Australian Government use scam marketing to recruit international students by offering permanent residency visas to eligible international students who study and complete an eligible degree course (e.g. Nursing) in their countries.

**Means:** Fraud and Deception

Canadian and Australian Governments deceitfully impose mandatory language tests on international student graduates who aim to earn a residency visa for either country.

Canadian and Australian Governments offer IELTS favorable legislative conditions to manage their Governments’ international student migration programs.

IELTS use examiner fraud to fail most international student graduates.

Canadian and Australian Governments offer IELTS immunity from prosecution because IELTS successfully minimize the number of international students eligible for migration.

**Purpose:** Other types of exploitation

Australian and Canadian Governments target vulnerable citizens of developing nations in Asia and the Middle East who aim to migrate to a developed country. Both Governments deceitfully fleece billions of dollars in tuition fees and other revenues (e.g. mandatory health insurance) from international students. Both Governments expel most of these students from their countries via IELTS fraud after they have graduated.
4.7 Modern day slavery

The IELTS consortium is an unconscionable, corrupt, criminal entity that has accrued massive economic gains from defrauding millions of citizens from the world’s poorest nations. As told by Graham (2017), the cost one IELTS exam is equivalent to around one month’s salary earned by a Filipino nurse. Moreover, it has been established that IELTS use systemic examination fraud to earn repeat exam sales from their vulnerable client base. I contrast the economic circumstances that Graham (2017) discusses in Figure 67, to the $16.4M salary package earned by IDP Education Chief Executive Andrew Barkla in 2016 (IDP Education, 2017b; The Australian 2016). IDP Education and IELTS are not educational providers. They are criminal global business operators.

Figure 67
IELTS Frauds Affects Vulnerable Citizens of Developing Nations

"Morally and ethically there also are issues around this exam in the case of Filipino nurses for example, where the cost of the exam is the equivalent of one month’s salary."

Graham (2017)

Most IELTS test-takers are resident citizens of developing nations. On average, it takes these persons approximately one month to earn enough income to pay for one IELTS test. IELTS repeatedly fail most foreign worker and permanent residency visa applications multiple times via examination fraud. The IELTS consortium willfully imposes modern day slavery on mostly non-white citizens of developing nations and they do so on a massive global scale.
Recommendations

5.1 Royal Commissions

Financial crimes and other crimes such harassment have been committed by IELTS partners in multiple jurisdictions. I call for all states, territories, provinces and national/federal jurisdictions which have hosted an IELTS test center over the past two decades to conduct a Royal Commission (or equivalent) into the financial and human rights crimes committed by IDP Education.

Australia

As host to IDP Education, Australia’s jurisdictions have a legal and moral obligation to investigate IDP Education’s domestic and global crimes as a matter of urgency.

Canada

The Canadian Government has willfully and persistently offered IDP Education and IELTS Canada immunity from prosecution as these corporations serve as a covert proxy agent that expels international students from Canada after they complete their studies in Canada. I call for Canada’s territory and provincial governments to show leadership and instigate Royal Commissions to preserve the reputation of their international education export industries.

5.2 Crimes against Humanity

I call for private citizens, non-governmental organizations and governments to petition the International Court of Justice to prosecute Australia, Canada and the United Kingdom for aiding
and abetting IDP Education to commit crimes against humanity on a massive transnational scale over a period of multiple decades. These crimes include:

- Human trafficking
- Modern day slavery
- Racketeering, fraud and extortion.

Members of the IELTS consortium have willfully and persistently targeted vulnerable citizens who are members of one or more of the following demographics: ‘youthful’ adults (aged under circa 29 years), citizens of developing nations, foreign workers, unskilled workers and non-native English language speakers.

5.3 Compensation and litigation

Global exam fraud, racketeering and financial extortion perpetrated by members of the IELTS consortium has cost IELTS’s estimated one million plus fraud victims billions of dollars over the past two decades. Furthermore, IELTS have repeatedly acted negligently by authoring secretive examination content and assessment policies that purposefully sets most test-takers up to fail.

Using statistical sampling techniques, I estimate that around half of IELTS’s fraud victims are/were international students who invested their personal/families’ life savings in an offshore education (e.g. in Australia, Canada) with a view to securing permanent residency. Public testimonies record that many of IELTS’s fraud victims used debt to finance their offshore studies.
Figure 68 is a calculation that illustrates the average cost to one international student who has been defrauded by members of the IELTS consortium. This calculation refers to a student who has completed a four-year bachelor’s Degree course, at median cost, at a Canadian university.

<table>
<thead>
<tr>
<th>IELTS: Illustration Compensation Claim</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>CAD$</strong></td>
</tr>
<tr>
<td>Tuition fees</td>
</tr>
<tr>
<td>Flights</td>
</tr>
<tr>
<td>Mandatory health insurance</td>
</tr>
<tr>
<td>IELTS exam fees</td>
</tr>
<tr>
<td>Mental health service fees</td>
</tr>
<tr>
<td>Damages to mental health</td>
</tr>
<tr>
<td><strong>Total compensation claim:</strong></td>
</tr>
</tbody>
</table>

The trickle-down effects of IELTS examination fraud has a multiplier effect in those nations with the largest immigration populations which have used IELTS services, such as India and China.

A quantification of funds collected by IELTS via extortion, racketeering and examination fraud is the subject of a separate project. This project also aims to quantify the compensation liability which IELTS owes its victims for negligence and tortious damages (see Jericho 2017, NP).
5.4 Canadian Government Duopoly

The Canadian Government ruthlessly offers IELTS a virtual monopoly status for supporting its offshore processing of skilled visa applications. CELPIP maintains one office outside of Canada and New York City. A relatively small percentage of applicants opt to undertake the French language test to earn a skilled work visa for Canada.

Members of the IELTS consortium ruthlessly exploit their virtual monopoly status and repeatedly conduct IELTS examiner fraud to maximize profits earned from repeat exam sales. These crimes align with Canada’s international student fee maximization policy scam. This country aims to maximize fees collected from international students and minimize the number of onshore graduates who are eligible for a permanent residency visa.

Canada’s language testing policy that it imposes on international student graduates is a blatant massive financial scam. If a person can earn a government-accredited Canadian Bachelor, Master or Doctoral Degree, taught exclusively in the French and/or English languages, it is deceitful and criminal for the Canadian Government to impose mandatory language testing requirements on these graduates who are otherwise eligible to receive a Canadian skilled worker residency visa.

The Canadian Government has a moral and legal obligation to invite a range of English language and French language providers to offer competition to IELTS and CELPIP. CELPIP is owned by the University of British Columbia. Profits from this entity are retained by Canada’s economy.
5.5 **Australian Government: United Nations Human Rights Council Member**

The Australian Government has historically used IELTS and IDP Education as covert proxy vehicles to manage its international student fee maximization policy scam (e.g. Ahern, 2009). Eligible international students who graduate in Australia are required to pass an English language test to qualify for permanent residency (Australian Government, 2017). IELTS repeatedly use examiner fraud to cull the number of international students who are eligible to immigrate to Australia after they complete their onshore studies and are no longer profitable to exploit. They do so to maximize IDP Education’s share price, profits from repeat exam sales and to maintain favorable relations with the Australian Government who they secretly regard as their host customer.

The Australian Government is a member of the United Nations Human Rights Council (United Nations, 2017). Australia’s public universities have perpetrated massive Crimes against Humanity against citizens of developing and developed nations. The Australian Government should prosecute IDP Education locally and via the International Court of Justice.

If the Australian Government continues to offer IDP Education and IELTS immunity from prosecution it should immediately resign from the United Nations Human Rights Council. It should also desist from its hypocritical behavior of criticizing human rights violations that are ostensibly perpetrated by other nation-states. At present, the Australian Government is an Arch human rights criminal under the auspices of international law.
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Appendix 1

Author’s academic qualifications

Bachelor of Commerce, University of Adelaide
Bachelor of Education (Professional Honors), University of Tasmania
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Master of Economics (Social Sciences) (Honors), University of Sydney
Doctor of Social Sciences, University of Sydney
Global English Language Tests Review Series

“Public Version” IELTS Assessment Rubrics:
A Call for Transparency

Research Communique Number 1
March, 2017

Jay Jericho D.Soc.Sc Syd
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IELTS Review Series

This document is the first Research Communique in a series that conducts a critical review of the International English Language Testing System (IELTS) and other global language tests. The scope of this project discusses the pedagogical design and the administrative regime of global English language examinations such as the IELTS.
Historical context

The IELTS assessment is the most popular English language exam for higher education and migration purposes (Cambridge English, 2017a, NP). On its home page, the IELTS (2017b, NP) organization states that “IELTS is the high-stakes English test for study, migration or work.” In 2015, around 2.7 million people sat for this examination in more than 140 countries (Conestoga, 2017, NP).

IELTS (2017d, NP) reports that citizens of the following 40 countries were the top “country of origin” of its examinees in 2015:

Bangladesh, Brazil, Canada, China (People's Republic of), Colombia, Egypt, France, Germany, Greece, Hong Kong, India, Indonesia, Iran, Islamic Republic of, Iraq, Italy, Japan, Jordan, Kazakhstan, Korea, Republic of, Kuwait, Malaysia, Mexico, Nepal, Nigeria, Oman, Pakistan, Philippines, Qatar, Russian Federation, Saudi Arabia, Spain, Sri Lanka, Taiwan, Thailand, Turkey, Ukraine, United Arab Emirates, United States of America, Uzbekistan, Viet Nam.

Business model

The IELTS organization is a collaborative joint venture that administers the IELTS exam. Table 1 summarizes the service-delivery structure of these three entities.

Table 1:
IELTS consortium partners: business model

<table>
<thead>
<tr>
<th>Member</th>
<th>Status</th>
<th>Source</th>
</tr>
</thead>
<tbody>
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<td>British Council</td>
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<tr>
<td>Cambridge Assessment (Brand)</td>
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<td>IDP Education Australia (2017, p. 6)</td>
</tr>
</tbody>
</table>
Revenue

The total annual revenue and financial surpluses/profits earned by members of the IELTS consortium for delivering IELTS goods and services is not disclosed in their Annual Financial Reports. Members of the IELTS consortium report their IELTS revenues as a component of a consolidated revenue item (British Council, 2017a, p. 60; Cambridge Assessment Group, 2015b, p. 7; IDP Education Australia, 2017, p. 17).

Members of the IELTS’s consortium and their authorized agents charge registrants a commercial fee to sit the IELTS exam. IELTS charges a standard fee by test center location.

IELTS does not offer a fee waiver or a reduced fee schedule for those who live in a state of “income poverty” as defined by the United Nations Educational, Scientific and Cultural Organization (2016, p. 160).

Table 2, overleaf, shows the fees schedule in six selected countries as at March, 2017. This data set contains a member nation from each continent, including the Indian subcontinent.
Table 2:

Selected IELTS registration fees by country

As at March 2017

<table>
<thead>
<tr>
<th>Country</th>
<th>(a) Commercial Fee</th>
<th>(b) USD</th>
<th>(c) GDP USD Per capita</th>
<th>(b)/(c) Cost Per capita</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ghana</td>
<td>GHS980</td>
<td>$216</td>
<td>$1,388</td>
<td>15.6%</td>
</tr>
<tr>
<td>India</td>
<td>Rupees 11,300</td>
<td>$173</td>
<td>$1,587</td>
<td>10.9%</td>
</tr>
<tr>
<td>China</td>
<td>RMB 1, 960</td>
<td>$284</td>
<td>$7,617</td>
<td>3.7%</td>
</tr>
<tr>
<td>Brazil</td>
<td>BRL800</td>
<td>$277</td>
<td>$11,387</td>
<td>2.4%</td>
</tr>
<tr>
<td>United Kingdom</td>
<td>GBP200 (Immigration)</td>
<td>$247</td>
<td>$46,461</td>
<td>0.5%</td>
</tr>
<tr>
<td>USA</td>
<td>USD$235</td>
<td>$235</td>
<td>$54,306</td>
<td>0.4%</td>
</tr>
</tbody>
</table>

Sources:

British Council (2017b; 2017c; 2017g; 2017j; 2017k; IELTS, 2017c).
(b) Bank of Canada (2017); (c) United Nations (2017).
Impartiality

The Global English Language Tests Review (GELTR) aims to provide an objective review of the scholarly design and global administration of the IELTS examination and substitute global English language tests such as Pearson, TOEIC and TOEFL. This series aims to complement the IELTS “Research Report” series published by IELTS.

Independence

In contrast to IELTS’s Research Report series, the GELTR is not subject to editorial amendments imposed by IELTS’s employees or its affiliates. Furthermore, in contrast to IELTS’s Research Report series, none of the costs involved in preparing and disseminating the GELTR are funded by the IELTS organization or its member partners.

Objective

This Research Communique aims to stimulate public discussion about the inclusion of the bracketed words “public version” [emphasis added] in the header of three of IELTS’s open-access online marking rubrics.

These assessment rubrics use a scale of zero to nine to grade four English language skills for the following components of the IELTS examination:
Evidence

- Speaking


  (British Council, 2017d)

- Writing task 1

  https://takeielts.britishcouncil.org/sites/default/files/IELTS_task_1_Writing_band_descriptors.pdf

  (British Council, 2017e)

- Writing task 2

  https://takeielts.britishcouncil.org/sites/default/files/IELTS_task_2_Writing_band_descriptors.pdf

  (British Council, 2017f)
The insertion of the words ‘public version’ into the headers of these assessment rubrics strongly suggests that IELTS maintains an internal marking rubric that is not available for public inspection.

**Discussion**

It is unclear how the internal IELTS examiner applies the “public version of the rubric”. For example, for band score zero, for all categories, one criteria states that the examinee “writes a totally memorised response” (British Council, 2017e, p. 2) for Writing Task 1.

A band score of 1 is awarded for Task Achievement for Writing Task 1 where the “answer is completely unrelated to the task” (British Council, 2017e, p. 2).

A literal reading of this assessment rubric suggests that an examiner may award a band score of zero for all four criteria if in their subjective opinion an answer has been memorized for Writing Task 1. According to the rubric (British Council, 2017e, p. 2), an overall score of zero may be awarded even if the content written by the examinee is a ‘perfect’ answer with respect to the requirements stated in the assessment question.

This example of the pedagogical shortcomings in IELTS’s assessment rubrics is one of many that I shall discuss in forthcoming Research Communiques. This Research
Communique aims to center on the issue of non-transparency and the labelling of IELTS assessment rubrics as ‘public version’.

**Commentary**

I argue that IELTS should not maintain a public version and private version of its marking rubrics for three reasons:

- Ethical considerations
- Pedagogical practices
- Customer service.

Labelling its marking rubrics as ‘public version’ documents may cause those studying for the IELTS exam to agonize over one or more of the following questions:

- Does a private marking rubric exist for one or more of these rubrics?
- If a private marking rubric exists, why is this information concealed from the public?
- In what ways does the private marking rubric differ from the public version?
• How and to what extent might I be disadvantaged from not having access to the internal version of IELTS’s marking rubrics for the written and spoken components of this exam?

The written and spoken components of the IELTS Academic and IELTS General exams are the most subjective parts of this assessment. It is possible for any person to assess their reading and listening skills at home. Official IELTS exam practice resources provide exact answers for reading and listening questions (British Council, 2017, NP).

It is impossible to prepare fully for any exam if the examiners use a marking system that is not disclosed in full and in a timely manner. This lack of transparency in turn may increase the anxiety levels of those required to prepare for an academic assessment (e.g. Reynolds-Keefer, 2010).

The use of secretive business practices in educational settings defies the spirit of fairness, transparency and accountability which the public expects from educational service providers that trade in the exchange of truth and knowledge (e.g. Hong & Walsh, 2009). Furthermore, the use of secretive business practices does not reflect a customer-oriented service delivery model. Such practices are indicative of a monopoly business model whereby one party aims to preserve its dominance as the gatekeeper of knowledge in a narrow field (e.g. Zoellner, 2014), such as English language testing.
For comment

I welcome members of the public to provide constructive feedback on this Research Communique. You may provide feedback in confidence or request to have this uploaded on the School’s website or GELTR’s website.

Initial distribution list

IELTS instructors;
IELTS stakeholders (global);
Former IELTS test-takers;
IELTS registrants;
IELTS research academics;
Former IELTS staff;
IELTS staff;
Education Minister, Canada.
Education Minister, United Kingdom.
Primary evidence


Scholarly references


Other references


The hidden curriculum, absent syllabus and severe complexity of the Academic and General Writing Task 2 component of the IELTS.

Research Communique Number 2
March, 2017

Jay Jericho D.Soc.Sc Syd
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- Colombia
- Egypt
- France
- Germany
- Greece
- Hong Kong
- India
- Indonesia
- Iran
- Islamic Republic of
- Iraq
- Italy
- Japan
- Jordan
- Kazakhstan
- Korea
- Republic of
- Kuwait
- Malaysia
- Mexico
- Nepal
- Nigeria
- Oman
- Pakistan
- Philippines
- Qatar
- Russian Federation
- Saudi Arabia
- Spain
- Sri Lanka
- Taiwan
- Thailand
- Turkey
- Ukraine
- United Arab Emirates
- United States of America
- Uzbekistan
- Viet Nam

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IELTS does not offer a fee waiver or a reduced fee schedule for those who live in a state of “income poverty” as defined by the United Nations Educational, Scientific and Cultural Organization (2016, p. 160).

Table 2, overleaf, shows the fees schedule in six selected countries as at March, 2017. This data set contains a member nation from each continent, including the Indian subcontinent.
Table 2:

Selected IELTS registration fees by country

As at March 2017

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</tr>
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<tbody>
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<td>$216</td>
<td>$1,388</td>
<td>15.6%</td>
</tr>
<tr>
<td>India</td>
<td>Rupees 11,300</td>
<td>$173</td>
<td>$1,587</td>
<td>10.9%</td>
</tr>
<tr>
<td>China</td>
<td>RMB 1,960</td>
<td>$284</td>
<td>$7,617</td>
<td>3.7%</td>
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<tr>
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<td>BRL800</td>
<td>$277</td>
<td>$11,387</td>
<td>2.4%</td>
</tr>
<tr>
<td>United Kingdom</td>
<td>GBP200 (Immigration)</td>
<td>$247</td>
<td>$46,461</td>
<td>0.5%</td>
</tr>
<tr>
<td>USA</td>
<td>USD$235</td>
<td>$235</td>
<td>$54,306</td>
<td>0.4%</td>
</tr>
</tbody>
</table>

Sources:

British Council (2017b; 2017c; 2017g; 2017j; 2017k; IELTS, 2017c).

(b) Bank of Canada (2017); (c) United Nations (2017).
Impartiality

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Evidence

I refer to the open-access website owned and managed by ‘IELTS Liz’. IELTS Liz is a globally respected online volunteer IELTS instructor. As at March 2017 she has 144, 300 subscribers to her YouTube channel (IELTS Liz, YouTube, 2017, NP).

IELTS Liz (2017, NP) informs her audience “I completed my IELTS examiner training in 2008”. This certification was earned three years after IELTS completed its last major

According to IELTS Liz (2017, NP) “There are only minimal differences between IELTS’s General writing task 2 and its Academic writing task 2.

Table 3, overleaf, summarizes the major similarities and minor differences between the General and Academic versions of the writing task 2 component of the IELTS.
Table 3:
Comparing the General and Academic Writing Task 2 essay questions

<table>
<thead>
<tr>
<th>Comparison criteria</th>
<th>Similarity/difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Essay question difficulty</td>
<td>Similar</td>
</tr>
<tr>
<td></td>
<td>The General question is often written in a way that is</td>
</tr>
<tr>
<td></td>
<td>clearer and easier to understand.</td>
</tr>
<tr>
<td>Topics for essay</td>
<td>Similar</td>
</tr>
<tr>
<td></td>
<td>General questions tend to focus on common issues.</td>
</tr>
<tr>
<td></td>
<td>The Academic test examines a wider range of topics.</td>
</tr>
<tr>
<td>Essay types</td>
<td>Same</td>
</tr>
<tr>
<td></td>
<td>You could receive a:</td>
</tr>
<tr>
<td></td>
<td>• Opinion essay</td>
</tr>
<tr>
<td></td>
<td>• Discussion essay</td>
</tr>
<tr>
<td></td>
<td>• Advantage/disadvantage essay</td>
</tr>
<tr>
<td></td>
<td>• Solution essay</td>
</tr>
<tr>
<td></td>
<td>• Direct question essay</td>
</tr>
<tr>
<td>Marking and scoring</td>
<td>Same</td>
</tr>
<tr>
<td>IELTS essay writing</td>
<td>Same</td>
</tr>
<tr>
<td>techniques</td>
<td></td>
</tr>
<tr>
<td>Essay length and timing</td>
<td>Same</td>
</tr>
</tbody>
</table>

Source: IELTS Liz (2017, NP)
Table 4, overleaf, cites two official exam preparation resources for the General and Academic versions of the IELTS exam. This data set illustrates the breadth of general knowledge required for writing task 2 for both versions of the IELTS exam. It also illustrates the strong similarities between each version of this scholastic aptitude test.
### Table 4:

#### Comparing the General and Academic Writing Task 2 essay questions:

##### Official open-access exam preparation questions

<table>
<thead>
<tr>
<th>General version</th>
<th>Academic version</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Education (sub-field: Children)</strong></td>
<td><strong>Society (subfield: Moral philosophy)</strong></td>
</tr>
<tr>
<td>“Some people believe that teaching children at home is best for a child’s development while others think that it is important for children to go to school.”</td>
<td>A person’s worth nowadays seems to be judged according to social status and material possessions. Old-fashioned values, such as honour, kindness and trust, no longer seem important.</td>
</tr>
<tr>
<td>Discuss the advantages of both methods and give your own opinion.</td>
<td>To what extent do you agree or disagree with this opinion?</td>
</tr>
<tr>
<td>Give reasons for your answer and include any relevant examples from your own knowledge or experience.</td>
<td>Give reasons for your answer and include any relevant examples from your own knowledge or experience.</td>
</tr>
<tr>
<td>Write at least 250 words.”</td>
<td>Write at least 250 words.”</td>
</tr>
<tr>
<td>British Council (2017f)</td>
<td>British Council (2017f)</td>
</tr>
<tr>
<td>“The care of old people is a growing problem. Some say the government should care for old people. Others say that it is the family’s responsibility. Discuss both these views and give your own opinion.”</td>
<td>“The threat of nuclear weapons maintains world peace. Nuclear power provides cheap and clean energy. The benefits of nuclear technology far outweigh the disadvantages. To what extent do you agree or disagree? Give reasons for your answer and include any relevant examples from your knowledge or experience.</td>
</tr>
<tr>
<td>Write at least 250 words.”</td>
<td>Write at least 250 words.”</td>
</tr>
<tr>
<td>Cambridge English (2017b)</td>
<td>Cambridge English (2017a)</td>
</tr>
</tbody>
</table>
I argue that the IELTS exam is severely flawed because it does not provide a curriculum document or a syllabus that informs future test-takers of a menu of topics that examinees may be required to discuss in the exam. Examinees may be subjected to a general knowledge examination on an extremely broad range of topics from specialist sub-fields within Arts and Sciences disciplines.

I refer to public access web content uploaded by ‘IELTS Liz’ on her IELTS training website. IELTS Liz (2017, NP) classifies her open-access collection of 100 authentic IELTS exam preparation resources for writing task 1 into the following 19 categories:

“Common IELTS Essay Questions

IELTS essay questions divided by topic

Art (5 essay questions)
Business & Money (17 essay questions)
Communication & Personality (17 essay questions)
Crime & Punishment (12 essay questions)
Education (17 essay questions)
Environment (12 essay questions)
Family & Children (8 essay questions)
Food & Diet (8 essay questions)
Most examinees who sit the IELTS exam do not speak English as a first language and are not from Western countries that administer the IELTS exam, *i.e.*, Australia and the United Kingdom (IELTS, 2017h). It is therefore essential that IELTS develops a new topic variable that is fair and accessible for those from diverse linguistic and cultural backgrounds (*e.g.*, Uysal, 2009, p. 316).

In its current form, the writing task imposes excessive demands on non-native English language speakers. IELTS markets itself as an international English language test. The truth is that writing task 2 examines a candidate’s general knowledge and critical thinking skills on virtually any contemporary social issue or scientific problem and does so from a Western perspective.
At present, IELTS does not publish an open-access curriculum document or syllabus that specify a selected range of topics that may appear in its exams in a general sense, or during a defined period such as a nominated calendar year (e.g., British Council, 2017f, NP). This absence of a public guideline document that outlines topic variables makes it extremely difficult for those who plan to sit for the IELTS exam to devise a strategy to prepare for writing task 2.

**Pedagogy**

I argue that IELTS should not impose a hidden curriculum on its ‘customers’ that is not supported by a curriculum document/syllabus for the following reasons:

- Pedagogical practices
- Emotional health
- Ethical considerations.

The written and spoken components of the IELTS Academic and IELTS General exams are the most subjective parts of this assessment. It is possible for any person to assess their reading and listening skills at home. Official IELTS exam practice resources provide exact answers for reading and listening questions (British Council, 2017f, NP).
It is extremely difficult for students to prepare fully for any exam if the examiners use a marking system that is not disclosed in full and in a timely manner (e.g. Reynolds-Keefer, 2010, pp. 4 & 6). This lack of transparency in turn may increase the anxiety levels of those required to prepare for an academic assessment.

The lack of a syllabus to guide instructors and students to prepare for the IELTS exam is problematic. As argued by IELTS researcher Qinglan Yu (2014, p. 26)

> Appropriate IELTS learning materials will play a very important role in classroom learning. Scientific teaching materials will change the current exercise-dominated classroom, increase learner's interest, accelerate teacher student interactions, optimize learning efficiency and virtually improve their performance in real test. Generally, in joint education program, to prepare students with best designed teaching materials, professional teachers should form a panel to select from existing teaching materials, including those imported from abroad, re-arrange them according to a specific syllabus [emphasis added], whether a function-notional, or a task-based, or more possible, a communicative syllabus.

I argue that IELTS should switch their writing task 2 format from a critical general knowledge scholastic format to one that focuses on basic “communication competence” (e.g. Uysal, 2009, p. 318) skills required of academic scholars, working professionals and private citizens who engage using the English language. This modification would morph the IELTS writing task 2 into a system that is more reflective of society-at-large.

The use of secretive business practices in educational settings defies the spirit of fairness, transparency and accountability which the public expects from educational service
providers who trade in the exchange of truth and knowledge (e.g. Hong & Walsh, 2009). Furthermore, the use of secretive business practices does not reflect a customer-oriented service delivery model. Such practices are indicative of a monopoly business model whereby one party aims to preserve its dominance as the gatekeeper of knowledge in a narrow field (e.g. Zoellner, 2014), such as English language testing.

**For comment**

I welcome members of the public to provide constructive feedback on this Research Communique. You may provide feedback in confidence or request to have this uploaded on the School’s website or GELTR’s website.

**Initial distribution list**

IELTS instructors;
IELTS stakeholders (global);
Former IELTS test-takers;
IELTS registrants;
IELTS research academics;
Former IELTS staff;
IELTS staff;
Education Minister, Canada.
Education Minister, United Kingdom.
Primary evidence


IELTS (2017a), *Find a test location*,

——— (2017b), *Home*,

——— (2017c), *ILSC New York*,

——— (2017d), *Test taker performance*,

Cambridge Assessment Group (2017a), *Our structure*,


Conestoga: Official IELTS Test Center (2017), *Test fee*,

IDP Education Australia (2017), *Annual Report 2016*,

IELTS Liz (2017), *100 IELTS Essay Questions*,
Scholarly references


Other data references


Other references

Global English Language Tests Review Series

IELTS appeals and remarking:

A call for transparency and confirmation of due process

Research Communique Number 3
March, 2017

Jay Jericho D.Soc.Sc Syd

jay@educate.institute

IELTS Review Series

This document is the third Research Communique in a series that conducts a critical review of the International English Language Testing System (IELTS) and other global language tests. The scope of this project discusses the pedagogical design and the administrative regime of global English language examinations such as the IELTS.
Historical context

The IELTS assessment is the most popular English language exam for higher education and migration purposes (Cambridge English, 2017a, NP). On its home page, the IELTS (2017b, NP) organization states that “IELTS is the high-stakes English test for study, migration or work.” In 2015, around 2.7 million people sat for this examination in more than 140 countries (Conestoga, 2017, NP).

IELTS (2017d, NP) reports that citizens of the following 40 countries were the top “country of origin” of its examinees in 2015:

- Bangladesh, Brazil, Canada, China (People's Republic of), Colombia, Egypt, France, Germany, Greece, Hong Kong, India, Indonesia, Iran, Islamic Republic of, Iraq, Italy, Japan, Jordan, Kazakhstan, Korea, Republic of, Kuwait, Malaysia, Mexico, Nepal, Nigeria, Oman, Pakistan, Philippines, Qatar, Russian Federation, Saudi Arabia, Spain, Sri Lanka, Taiwan, Thailand, Turkey, Ukraine, United Arab Emirates, United States of America, Uzbekistan, Viet Nam.

**Business model**

The IELTS organization is a collaborative joint venture that administers the IELTS exam. Table 1 summarizes the service-delivery structure of these three entities.

**Table 1:**

**IELTS consortium partners: business model**

<table>
<thead>
<tr>
<th>Member</th>
<th>Status</th>
<th>Source</th>
</tr>
</thead>
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<tr>
<td>British Council</td>
<td>“a public corporation (in accounting terms)”</td>
<td>British Council (2017f, NP)</td>
</tr>
<tr>
<td>Cambridge Assessment</td>
<td>A “non-teaching department of the University of Cambridge”</td>
<td>Cambridge Assessment Group (2017a, NP)</td>
</tr>
<tr>
<td>Limited</td>
<td>A for-profit corporation that is listed on the Australian Stock Exchange.</td>
<td>IDP Education Australia (2017a, p. 6)</td>
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Sources:

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Objective

This Research Communique aims to stimulate public discussion about factors that are not made public about IELTS appeals and remark procedures. This Research Communique questions whether the personal details and demographic data of IELTS’s candidates remain concealed from IELTS’s examiners throughout the remarking process.
Transparency

Guidelines

IELTS does not make public comprehensive guidelines to aid a candidate to determine whether they should appeal their examination scores. For example, I cite the IELTS training website of former British Council employee Christopher Pell (2017), a qualified lawyer (Britain), who formerly designed IELTS training materials for the British Council:

“Should I Get My IELTS Test Remarked?

By Christopher Pell 12 Comments

One of the biggest concerns students have is whether or not to get their tests remarked if they don’t get the scores they were expecting.

There is very little official guidance from IDP and the British Council on when you should do this, so I have given you some advice below.”
Public data

There is a lack of public data about the outcome of IELTS internal remarking:

“IELTS do not publish any statistics on what percentage of remarks are successful and every case is different, therefore, it is very difficult to determine if you should get a remark or not (Pell, 2017, NP).”

This lack of transparency extends to IELTS’s internal examination process.

Process

IELTS does not publish comprehensive information about its appeals and remarking process.

IDP Australia (2017b) limit the information made public to the following statement on their official website:

“When can I apply for an Enquiry on Result?

This request must be made within six weeks of the test date on the Test Report Form.
How long will this process take?

The Enquiry on Results will be processed within six to eight weeks. You will receive a letter via email confirming your final score from your test centre after this time.

How much will it cost?

contact your local IDP IELTS test centre for more information about the fees.

Important points

• There is no appeal after this re-mark, the decision is final.

• You have to send the original TRF to the test centre you received it from.

• During the period of remarking your test results cannot be used to apply for a university or to be sent to an immigration office.

• Should the scores change after the Enquiry on Results, we will issue a new Test Report Form for the candidate, who can apply for (5) five extra copies to be sent to receiving institutions free of charge within one month of the printing date at the bottom of the new Test Report Form.

• For those whose scores remain the same we will return the original Test Report Form to the candidate and there will be no refund.

How can I apply for a remark?
Please provide your full detailed contact address, including PO Box and daytime telephone number on the “Enquiry on Results Form”. You can download this from here.

Send the completed Enquiry on Results Form, receipt of payment and the original Test Report Form and post it to IDP Education – IELTS Test Centre.”

**Correction**

I challenge the assertion made by IDP Australia (2017b, NP) that:

“• There is no appeal after this re-mark, the decision is final.”

IELTS candidates have the right to recourse outside of IELTS. For example, they may apply to have their case heard by an independent Consumer Affairs Tribunal, such as the New South Wales Civil and Administrative Appeals Tribunal (Australia).

I propose that IELTS should revise their statement about “no appeal” to “there is no internal avenue of appeal after this re-mark, the decision is final.”
**Objective primary evidence**

IELTS’s application form goes far beyond the minimum amount of data collection required to satisfy domestic laws and ensure the integrity of its examination.

As a condition of enrolment, IELTS firmly requests that all registrants *must* provide personal and demographic details that should have absolutely no bearing whatsoever on an applicant’s eligibility to sit the IELTS exam and the scores that they are awarded.

IELTS application form explicitly requests details about a registrant’s:

- Native language
- Citizenship
- Country of residence
- Occupation
- Occupation status (*e.g.* employee *c.f.* management)
- Education level
- English language study history
- Purpose for taking the IELTS exam
- Intended country of use for IELTS results.

Source: (British Council, 2017a, p. 2).
IELTS’s application form shows a very strong interest in identifying the country where their customer aims to use their IELTS test results.

It is questionable whether the application form allows for a ‘not applicable’, ‘private’, or ‘not yet known’ response for this question.

“Which country are you applying to/intending to go to?

(tick one box only) Australia Canada New Zealand Republic of Ireland United Kingdom United States of America other, please specify”

Source: British Council (2017a, p. 2).

A copy of IELTS’s application form is available at this link:

https://www.ielts.org/-/media/pdfs/application-form.ashx
IELTS’s application form does not stipulate that candidates may opt out from answering personal questions that should have absolutely no bearing whatsoever on a candidate’s eligibility or suitability for registering for the IELTS exam.

As a condition of registration, applicants must sign a form and agree that:

“2. I certify that the information in my application is complete, true and accurate.”

Furthermore,

“7. I understand that if the details on this form are not completed my application may not be processed.”

Source: British Council (2017a, p. 4).

It is unclear if there are negative repercussions for the candidate if they accidentally or purposefully offer a misleading or incomplete response for personal and demographic data collection questions:

“13. I understand that the IELTS Test Partners have a responsibility to all candidates and Recognising Organisations to ensure the highest confidence in the accuracy and integrity of test results and that the IELTS Test Partners therefore reserve the
right to withhold test results temporarily or permanently, or to cancel test results which have been issued, if they consider those results to be unreliable for reasons of suspected malpractice or any other irregularity in the test process [emphasis added].”

Source: British Council (2017a, p. 4).

Argument

I argue that IELTS should not firmly request vast quantities of irrelevant personal and demographic data from candidates as a condition of enrolment.

IELTS have a legitimate need to identify a candidate. This legitimate need should not extend beyond confirming those details on a person’s birth certificate which also appear on their passport and national identity card. These include the registrant’s:

- First name/s;
- Surname;
- Gender – which may not necessarily be limited to the retrograde ‘Male’ or ‘Female’ options currently shown on IELTS’s application form;
- Place of birth;
- Date of birth.
Furthermore, I argue that a candidate’s previous IELTS scores, for all tests, should be concealed from all IELTS examiners throughout the first marking procedure and during the remark/appeals process. At present, it is not clear if IELTS examiners are able to review a candidate’s prior exam test scores, and if they can, how frequently they choose to do so, and for what reasons they may be doing this.

I argue that the personal and demographic data of IELTS candidates should be concealed from all IELTS examiners throughout the first marking procedure and during the remark/appeals process. Exposure to such demographic data may unfairly influence an examiner’s perceptions of a candidate’s English language abilities at a conscious or subconscious level.

To illustrate this point, please consider this illustration example comparative data set shown in Table 3, overleaf.

Please also consider the potential effect that exposure to such data may have on an examiner, senior examiner or supervising examiner if they see this data prior to marking a candidate’s exam or when they are marking the exam.
Table 3:

A hypothetical illustration of the subconscious psychological influence that a candidate’s private demographic data may exert over an examiner

<table>
<thead>
<tr>
<th>Mandatory demographic data collected by IELTS</th>
<th>Candidate 1</th>
<th>Candidate 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>First name</td>
<td>Liang</td>
<td>Alistair</td>
</tr>
<tr>
<td>Family name</td>
<td>Xu</td>
<td>Westminster</td>
</tr>
<tr>
<td>Title</td>
<td>Miss</td>
<td>Dr. (Doctor)</td>
</tr>
<tr>
<td>Sex</td>
<td>Female</td>
<td>Male</td>
</tr>
<tr>
<td>Age (Date of birth)</td>
<td>17</td>
<td>45</td>
</tr>
<tr>
<td>Country or region of origin</td>
<td>Asia</td>
<td>Western Europe</td>
</tr>
<tr>
<td>Address</td>
<td>Rural Cambodia</td>
<td>Oxford University Hall of Residence, England</td>
</tr>
<tr>
<td>Country of nationality</td>
<td>Cambodia</td>
<td>United Kingdom</td>
</tr>
<tr>
<td>First language</td>
<td>Cambodian</td>
<td>English</td>
</tr>
<tr>
<td>How many years have you been studying English</td>
<td>1</td>
<td>20</td>
</tr>
<tr>
<td>What level of education have you completed?</td>
<td>Secondary up to 16 years</td>
<td>Postgraduate</td>
</tr>
<tr>
<td>Occupation</td>
<td>Other</td>
<td>Education</td>
</tr>
<tr>
<td>Occupation level</td>
<td>Worker in the home</td>
<td>Employee (Senior Level)</td>
</tr>
<tr>
<td>Scheme code</td>
<td>Australia bound</td>
<td>Private candidate</td>
</tr>
</tbody>
</table>

All data shown in this table must be provided as a condition of enrolling in the IELTS examination. Authority: [https://www.ielts.org/-/media/pdfs/application-form.ashx](https://www.ielts.org/-/media/pdfs/application-form.ashx)
Pedagogy

Blind-marking of academic work is considered best practice by many scholars as it may reduce examiner bias of the aptitude of examinees from certain demographics such as racial groups and gender groups (e.g. Fleming, 1999; Malouf et al., 2013).

The use of blind-marking at all stages during IELTS internal marking process may reassure the public that all forms of conscious and subconscious assessor bias have been removed. In the context of the IELTS exam, this particularly concerns biases based on:

- Age
- Race
- Religion
- Ethnicity
- Country of origin
- Education level
- Gender
- Class (socio-economic status)
- Intended immigration purposes.

The potential for examiner bias in the IELTS exam for some of these categories may be indirect. For example, some names such as ‘Muhammad Abdullah’ may be associated with a specific religion, region of origin or first-language.
It is not known whether IELTS use a blind-marking system at all stages during the examination and remarking process.

The use of non-disclosed business practices in educational settings defies the spirit of fairness, transparency and accountability which the public expects from educational service providers that trade in the exchange of truth and knowledge (e.g. Hong & Walsh, 2009). Furthermore, the use of undisclosed business practices does not reflect a customer-oriented service delivery model. Such practices are indicative of a monopoly business model whereby one party aims to preserve its dominance as the gatekeeper of knowledge in a narrow field (e.g. Zoellner, 2014), such as English language testing.

For comment

I welcome members of the public to provide constructive feedback on this Research Communique. You may provide feedback in confidence or request to have this uploaded on the School’s website or GELTR’s website.

Initial distribution list

IELTS instructors; IELTS stakeholders (global); Former IELTS test-takers; IELTS registrants; IELTS research academics; Former IELTS staff; IELTS staff; Education Minister, Canada; Education Minister, United Kingdom.
Primary evidence


Scholarly references


Other references


IELTS Review Series

IELTS speaking questions:
Non-universal content and the absence of choice

Research Communique Number 4
March, 2017

Jay Jericho D.Soc.Sc Syd

jay@educate.institute

IELTS Review Series

This document is the fourth Research Communique in a series that conducts a critical review of the International English Language Testing System (IELTS) and other global language tests. The scope of this project discusses the pedagogical design and the administrative regime of global English language examinations such as the IELTS.
**Historical context**

The IELTS assessment is the most popular English language exam for higher education and migration purposes (Cambridge English, 2017a, NP). On its home page, the IELTS (2017b, NP) organization states that “IELTS is the high-stakes English test for study, migration or work.” In 2015, around 2.7 million people sat for this examination in more than 140 countries (Conestoga, 2017, NP).

IELTS (2017e, NP) reports that citizens of the following 40 countries were the top “country of origin” of its examinees in 2015:

- Bangladesh, Brazil, Canada, China (People's Republic of), Colombia,
- Egypt, France, Germany, Greece, Hong Kong, India, Indonesia, Iran,
- Islamic Republic of, Iraq, Italy, Japan, Jordan, Kazakhstan, Korea,
- Republic of, Kuwait, Malaysia, Mexico, Nepal, Nigeria, Oman, Pakistan,
- Philippines, Qatar, Russian Federation, Saudi Arabia, Spain, Sri Lanka,
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The IELTS organization is a collaborative joint venture that administers the IELTS exam. Table 1 summarizes the service-delivery structure of these three entities.

Table 1:
IELTS consortium partners: business model

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Table 2, overleaf, shows the fees schedule in six selected countries as at March, 2017. This data set contains a member nation from each continent, including the Indian subcontinent.
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**Selected IELTS registration fees by country**

*As at March 2017*

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<td>BRL800</td>
<td>$277</td>
<td>$11,387</td>
<td>2.4%</td>
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<td>$54,306</td>
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Sources:

- British Council (2017c; 2017d; 2017e; 2017h; 2017i; IELTS, 2017c).
- (b) Bank of Canada (2017); (c) United Nations (2017).
Impartiality

The Global English Language Tests Review (GELTR) aims to provide an objective review of the scholarly design and global administration of the IELTS examination and substitute global English language tests such as Pearson, TOEIC and TOEFL. This series aims to complement the IELTS “Research Report” series published by IELTS.

Independence

In contrast to IELT’s Research Report series, the GELTR is not subject to editorial amendments imposed by IELT’s employees or its affiliates. Furthermore, in contrast to IELT’s Research Report series, none of the costs involved in preparing and disseminating the GELTR are funded by the IELT organization or its member partners.

Objective

This Research Communique discusses two myths about the speaking component of the IELTS:

- That this test only assesses a person’s English language abilities;

- That the content is culturally neutral, i.e., it is global in outlook.
This Research Communique analyzes primary evidence to show that the content of the IELTS speaking test questions favors persons from developing countries. Furthermore, it also tests a person’s general knowledge and critical thinking skills under strict examination conditions.

**Myth**

The IELTS organization explicitly claims that the IELTS is a global English language test. It does not recognize that this global English language exam aims to do more than test a person’s English language skills:

“The International English Language Testing System (IELTS) is widely recognised as a reliable means of assessing the English language ability of candidates who need to study or work where English is the language of communication.” (Cambridge University Press, 2016, p. 1)

The IELTS organization implicitly claims that the IELTS exam is an international English language test. This argument is evident from the name of this examination, *i.e.*, the “International English Language Testing System”.
**Format**

The structure, format and marking scheme for the General and Academic version of IELTS’s speaking exams are identical.

“Test format – Speaking

11–14 minutes

The speaking component assesses your use of spoken English. Every test is recorded.

Part 1 - the examiner will ask you general questions about yourself and a range of familiar topics, such as home, family, work, studies and interests. This part lasts between four and five minutes.

Part 2 - you will be given a card which asks you to talk about a particular topic. You will have one minute to prepare before speaking for up to two minutes. The examiner will then ask one or two questions on the same topic.

Part 3 - you will be asked further questions about the topic in Part 2. These will give you the opportunity to discuss more abstract ideas and issues. This part of the test lasts between four and five minutes.” (IELTS, 2017d)

**Background to the problem**

Dr. Jay Jericho holds an Honors Degree in Education and a Graduate Certificate in Education (Teaching English as a Second Language) from the University of Tasmania. He also holds degrees in Commerce, Economics and a Doctorate in Sociology from the University of Sydney.
The author of this document has previously received formal IELTS training by two practicing IELTS examiners when he was employed as a learning skills tutor at an Australian university. In this capacity, he tutored IELTS’s registrants (including those who had previously sat for an IELTS exam) at an accredited Australian University based at its Sydney International Campus. He has also taught IELTS as an English Language Program Manager at a Registered Training Organization (RTO) in New Zealand. He has also taught IELTS privately on a volunteer basis in Australia and New Zealand.

A personal narrative

The experiences that I discuss below are honest personal anecdotes that draw on a diverse sample to draw inferences. Readers may reflect on their own experiences and logic and form their own conclusions. The intention of this Research Communique aims to encourage those who have been involved with IELTS to discuss their personal experiences so that data may be collected and analyzed in a systematic and scientific manner on a global basis.

I have taught IELTS since 2010. During this time, I have taught IELTS to around 30 candidates whose advanced English language skills have been independently verified by credible educational institutions. Examples of these candidates include adults who have spent their entire life living in a country where English is an official language or the
official language. Furthermore, these persons have also completed high school and university studies that were conducted mostly or exclusively via the English language. I have personally encountered advanced English language speakers who are university graduates from an English-speaking university struggle to answer multiple sub-parts of official IELTS speaking exam practice questions. In multiple instances, these students remained silent when I have asked them a question during a mock exam, using official IELTS exam practice resources under exam conditions.

Exam preparation

Some students have told me that they remained silent because the question/s requires them to discuss a topic that they have never been exposed to. These include references to objects, places, environmental landscapes, natural phenomena, living beings, thoughts, personal experiences, ideas, occupations and other social constructions that do not exist in their homeland or their place of residence.

Official exams

Multiple students have told me that they remained silent in response to one or more questions that an examiner put forward during an official IELTS exam. When I have asked them why they remained silent, most students explained to me that one or more exam questions required them to discuss a topic that they have never been exposed to, such as references to objects, ideas, human positions (*e.g.* work roles) and other social constructions that do not exist in their homeland or their place of residence.
There are three main problems with the pedagogical design of the IELTS speaking test.

Core problem 1: Not a universal test

The IELTS speaking test is not universal as it favors those who live in developed economies.

Persons who have not spent many years living in a developed country such as Canada or Japan may struggle to grasp the topics they are required to discuss under strict exam conditions. This document shows how candidates may be required to discuss issues such as modern housing arrangements and digital media that do not exist in isolated communities such as Indigenous townships and rural communities in developing nations.

Core problem 2: Authenticity

The IELTS speaking test does not replicate real-life conditions that most people experience in social, educational and work spheres of society where choices abound. The speaking component of the IELTS exam denies examinees choice. Candidates may be required to discuss topics that have no relevance whatsoever to their lifestyle, life-course and their English language abilities.
Core problem 3: Hidden curriculum and absent syllabus

The IELTS speaking test is not a pure English language exam that only assesses a candidate’s English language speaking skills. Examinee’s are required to think and speak critically and may be examined on virtually any topic that relates to specialist fields within Arts and Sciences disciplines. IELTS do not publish a curriculum or syllabus document that narrows the field of questions that a candidate may be required to discuss.

Eleven distinct pedagogical design flaws

My preliminary research identifies eleven pedagogical design flaws that persist in IELTS’s official exam practice resources. IELTS have stated publicly that their official exam practice resources aim to replicate the types of questions that appear in official exams (Cambridge University Press, 2016, p. 4). It is difficult to know if official IELTS exam practice materials are partial or complete replicas of prior IELTS exams. IELTS is a notoriously secretive entity and it does not publicly disclose this information.

I speculate that multiple persons who have undertaken an IELTS exam have experienced exam testing bias for reasons that are not their fault. Put differently, on the balance of probabilities, multiple design flaws that persist in IELTS’s speaking exam are disadvantaging some, most or all test takers to varying degrees on a global basis.
Data/evidence

Tables 3, 4 and 5 in this document list two sample questions from speaking parts 1, 2 and 3. These questions have been copied verbatim from the following source:


The inclusion of these data tables aims to serve two purposes. The first intention is to show that there are multiple pedagogical design flaws that persist in IELTS’s official exam practice resources. Furthermore, these design flaws exist in:

- Each section of the exam, *i.e.*, speaking parts 1, 2 and 3;
- All four practice exams published in each of IELTS’s exam practice series.

To demonstrate that these problems exist in official exam preparation resources published prior to 2016, I list examples in this section that appear in official IELTS exam preparation commercial publications dated prior to 2016.
Problem 1: A premise is built into the question

Practice test 3, part 2

Describe a child that you know. You should say who this child is and how often you see him or her.

(Cambridge University Press, 2016, p. 79)

This question assumes that the candidate knows a child. This question also assumes that the examinee sees this child in person or via virtual reality media such as Skype.

Problem 2: Hidden curriculum - general knowledge

Practice test 1, part 3

What kind of jobs have the highest salary in your country? Why is this?

(Cambridge University Press, 2016, p. 32)

This question unfairly assumes that the candidate is aware of economic data and can also offer a logical explanation that explains economic data related to their home country.
Problem 3: Hidden curriculum - critical thinking and argument

Practice test 1, part 3

Some people say it would be better for society if everyone got the same salary. What do you think about that? Why?

(Cambridge University Press, 2016, p. 32)

This question goes well beyond testing a person’s English language speaking skills. The candidate is required to offer an opinion, which may not necessarily be their own, on a topic that concerns political economy concepts such as free-market capitalism, planned economies and Marxist political thought.

Problem 4: Lack of universality

Practice test 2, part 2

Describe a shop near where you live that you sometimes use.

(Cambridge University Press, 2016, p. 56)
Some persons do not live near a shop and therefore do not frequent any shops as browsers or as customers. Examples may include those who live hunter-gatherer lifestyles and self-sufficient rural agriculturalists who do not participate in a barter or cash economy.

**Problem 5: ‘Mindreading’ the national, regional or global consensus**

Practice test 2, part 3

Why do some people want to start their own business?

(Cambridge University Press, 2016, p. 56)

This question requires the candidate to best guess the motives of masses of people. The question does not state the time and place parameters that the candidate is required to discuss. It appears that the candidate is required to ‘mind read’ the motives of humankind at large.

**Problem 6 – Forecasting human behavior on a mass scale**

Practice test 3, part 3

How do you think children’s activities will change in the future?

(Cambridge University Press, 2016, p. 79)
This question requires candidates to speculate about unknown factors. Many esteemed PhD-qualified social sciences research scholars do not speculate about future unknowns. It is difficult to predict the future due to the large number of variables and factors involved in forecasting human behavior (e.g. Goldthorpe, 2001; Taleb et al., 2009).

Problem 7: Vast extent of questions with no supporting syllabus document

Practice test 1, part 3

Why do people choose to become teachers?

(Jakeman & McDowell, 2015, p. 28)

It is most unfair for IELTS’s examinees to be required to know or speculate about facts related to the teaching profession if the requirement to know about this profession is not listed in a syllabus document. There are thousands of professions. Examples include electricians, politicians, musicians, truck drivers and nurses. It appears that IELTS expects an examinee to have an opinion on any profession during the speaking exam.

Problem 8: Deeply personal questions

Do you think that owning lots of things makes people happy? Why?
This question asks about a candidate’s attitudes towards materialism. This question is deeply personal. A candidate’s inability or refusal to respond to such deeply personal questions may have nothing to do with their lack of English language speaking skills.

Problem 9 - Logical incoherence

The sequence in this question is not logical. This example is not an isolated incident in the IELTS series. The first question requires a ‘yes’, ‘no’ or ‘neutral’ response, or a sensible alternative answer such as ‘I am not sure because …’
The second question may contradict the first question. The examinee may never have travelled anywhere. If a candidate has never travelled, it is illogical to ask them if they enjoy doing something that they have never experienced.

**Problem 10 – using abbreviations that are not defined**

Test 1, part 1

Do you watch cooking programs on TV? [why/why not?]

(Cambridge University Press, 2016, p. 32)

IELTS’s assessment rubrics impose high English language grammar standards on those who sit their scholastic aptitude test. It is unfair to assume that a person who does not speak English as a first language will know what is meant by the acronym ‘TV’ which is not a universal English language word. The examiner should use the formal English language word ‘television’ in the question. I do not cite this criticism as a major point.

**Problem 11 - Poor grammar**

Test 4, part 3
Are there any benefits to society of people wanting to get new possessions?

(Cambridge University Press, 2016, p. 103)

The grammar in this question is flawed. This is not an isolated case in the Cambridge IELTS series. A correct way to state this question is as follows:

Are there any benefits to society that are realized from people wanting to get new possessions?

Alternatively, a better way to restate this question is as follows:

Are there any benefits to society that are realized from people wanting to acquire/purchase/obtain new possessions?

Choice

Most students who take the IELTS exam do not speak English as a first language (IELTS, 2017e). Writing English language, examinations is not a simple process and no system is perfect. Achieving universality in a set of questions is near-impossible.
I argue that IELTS can significantly improve their examination by offering a range of questions that allow a candidate to talk about a topic in a general sense, rather than being ‘forced’ to discuss a specific topic that may have no relevance to their life-course and homeland. These questions could be written down on paper and the candidate could be allotted one minute to select a set of questions that caters for their unique life-course.

I argue that the current format of the IELTS exam is unfair as it requires some, most or all candidates to improvise to some degree to respond to exam questions.

This pedagogical design flaw transforms the IELTS exam into a test of a person’s creative imagination when using the English language under strict exam conditions.

This in turn severely undermines the ‘authentic’ experience that IELTS publicly claims to replicate in its global English language scholastic aptitude test.
<table>
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<tr>
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<th>Pedagogical problem</th>
<th>Possible alternative</th>
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<tbody>
<tr>
<td>Tell me about your best friend at school.</td>
<td>When you visit other places, do you take photos or buy postcards?</td>
<td>There are two premises built into the question that might not reflect the lifestyle for some, most or all examinees.</td>
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<td>Cambridge University Press (2016, p. 56)</td>
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<td>Premise 1: the examinee went to school.</td>
<td>Premise 1: the examinee has left their place of residence and/or their hometown.</td>
<td>2. Invite the candidate to talk about any persons that they know from any context.</td>
<td>2. Invite the candidate to talk about their perceptions of a place they have visited or plan to visit at any time in the future.</td>
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<tr>
<td>Pedagogical problem</td>
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<td>Premise 2: the examinee has a best friend.</td>
<td>Premise 2: the examinee has visited multiple places away from their place of resident and/or their hometown.</td>
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<td>Describe a day when you thought the weather was perfect and explain why you thought the weather was perfect on this day.</td>
<td>Describe a TV documentary that you watched that was particularly interesting.</td>
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<tr>
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<td>Premise 1: the examinee has watched a television documentary.</td>
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<tr>
<td>Premise 2: there is a reason why an examinee thought that a day was perfect.</td>
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<tr>
<td>2. Invite the candidate to talk about their experience of any type of weather.</td>
<td>2. Invite the candidate to talk about their opinion about any type of media.</td>
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Table 5:
IELTS General and Academic Speaking Part 3

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<tr>
<td>What do you think are the advantages of living in a house rather than an apartment?</td>
<td>What types of weather do people in your country dislike most? Why is that?</td>
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<tr>
<td>This question lacks universality. Not all persons live in regions where there are houses and apartments. Examples include inhabitants of indigenous nations and regions. Some IELTS examinees have never been exposed to houses and apartments.</td>
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<td>2. Invite the candidate to talk about their opinion on any type of housing.</td>
<td>2. Invite the candidate to discuss their personal opinions about any type of weather that they have witnessed in their country of residence.</td>
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April, 2017

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<td>$284</td>
<td>$7,617</td>
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<td>Brazil</td>
<td>BRL800</td>
<td>$277</td>
<td>$11,387</td>
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</tr>
<tr>
<td>United Kingdom</td>
<td>GBP200 (Immigration)</td>
<td>$247</td>
<td>$46,461</td>
<td>0.5%</td>
</tr>
<tr>
<td>USA</td>
<td>USD$235</td>
<td>$235</td>
<td>$54,306</td>
<td>0.4%</td>
</tr>
</tbody>
</table>

Sources:

British Council (2017c; 2017d; 2017e; 2017h; 2017i; IELTS, 2017c).

(b) Bank of Canada (2017); (c) United Nations (2017).
Impartiality

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Myth

The IELTS organization explicitly claims that the IELTS is a global English language test. It does not recognize that this global English language exam aims to do more than test a person’s English language skills:

“The International English Language Testing System (IELTS) is widely recognised as a reliable means of assessing the English language ability of
candidates who need to study or work where English is the language of communication.” (Cambridge University Press, 2016, p. 1)

The IELTS organization implicitly claims that the IELTS exam is an international English language test. This argument is evident from the name of this examination, *i.e.*, the “International English Language Testing System”.

The IELTS examination contains a hidden curriculum that repeatedly tests examinee’s general knowledge. Moreover, it does so from the perspective of the cultural practices that are dominant in developed nations, in particular, Western developed nations (Jericho, 2017a).

**Objective**

This Research Communique reviews IELTS’s Academic reading test. I do this by conducting an in-depth analysis of reading test 1 extracted from the following official IELTS Academic test preparation publication:

The quantity and nature of the pedagogical design flaws found in this practice test is representative of those contained in most of IELTS’s official Academic test practice resources.

**Format**

IELTS describe the format of its Academic reading test as follows:

“Test format – Reading

60 minutes

The Reading component consists of 40 questions, designed to test a wide range of reading skills. These include reading for gist, reading for main ideas, reading for detail, skimming, understanding logical argument and recognising writers’ opinions, attitudes and purpose.

IELTS Academic test - this includes three long texts which range from the descriptive and factual to the discursive and analytical. These are taken from books, journals, magazines and newspapers. They have been selected for a non-specialist audience but are appropriate for people entering university courses or seeking professional registration.” (IELTS, 2017d)

**Extrapolating flaws**

IELTS have stated publicly that their official exam practice resources aim to replicate the types of questions that appear in official exams (Cambridge University Press, 2016, p. 4).
It is difficult to know if official IELTS exam practice materials are partial or complete replicas of prior IELTS exams as IELTS does not publicly disclose this information.

I speculate that multiple persons who have undertaken an IELTS exam have experienced exam testing bias for reasons that are not their fault. Put differently, on the balance of probabilities, the multiple design flaws that persist in IELTS’s speaking exam are unfairly disadvantaging some, most or all test takers to varying degrees (e.g. Jericho 2017a; 2017b).

Data/evidence


Questions 1 to 4: True, False, Not Given

Question 2: Subjectivity

“Some people have to borrow large amounts of money to go to college.”
The word ‘large’ is subjective. Perceptions of this word may vary depending on numerous factors such as the examinee’s socio-economic status, country of residence and accumulated private wealth.

This passage of the text refers to the words “thousands of dollars of debt” in the opening paragraph. The word ‘thousands’ may refer to a figure of anywhere between USD 2,000 and USD 999,000.

It is not necessary to refer to a subjective concept of relative quantity to test the readers’ understanding of the concepts of ‘debt’ and ‘borrowings’. An alternative question could state:

“Certain students must borrow funds to finance their tuition fees”.

**Question 5: Ambiguity and grammatical errors**

“Complete the Fact Sheet below.

Write no more than three words from the passage for each answer.”

“The average high school graduate makes a little more than one million dollars in ______”
(a) Problem 1: ambiguity and subjectivity

Question 5 refers to the reading passage that states “over an adult’s working life, high school graduates earn an average of $1.2M”. Reference to the words ‘a little more than’ refers to the figure USD 200,000.

As shown in Table 2, average annual earnings in China are USD 7,617. A figure of USD 200,000 equates to around 26 years of earnings in China for those who earn the average wage. This global analysis shows that the figure USD$200,000 is not ‘little’.

An alternative question could state:

“The average earnings of a high school graduate exceeded one million dollars in ______”

(b) Problem 2: Incorrect grammar

“The average high school graduate makes a little more than one million dollars in ______”

The grammar in this question is awkward as it implicitly classifies high school graduates as being one of the following: below average, average or above average. The syntax
string ‘the average high school graduate’ suggests that it discusses the scholastic abilities of high school graduates as opposed to their average lifetime earnings.

An alternative question could state:

“The average earnings of high school graduates exceed one million dollars in ______”

(c) Problem 3: Grammatical errors in the instructions

“The average high school graduate makes a little more than one million dollars in ______”

The correct answer is “A lifetime”

“IELTS requests that examinees write no more than three words from the passage [emphasis added] for each answer.”

The string of words “A lifetime” does not appear in the reading passage.

The reading passage states:

“According to the Census Bureau, over an adult’s working life, high school graduates earn an average of $1.2 Million”.

Furthermore, this reading passage also provides the same information, using different words:

“These sizeable differences in lifetime earnings put the costs of college study in realistic perspective.” (p. 18)

(d) Problem 4: ‘Mindreading’ IELTS preferred rewording

“The average high school graduate makes a little more than one million dollars in ______”

The correct answer is “A lifetime”

This string of words does not appear in the reading passage. There are two reading passages that are relevant to this question:

“According to the Census Bureau, over an adult’s working life, high school graduates earn an average of $1.2 Million”. (p. 18)

and
“These sizeable differences in lifetime earnings put the costs of college study in realistic perspective.” (p. 18)

The official answer paraphrases text from the original reading passage. There is no obvious logic that explains why “a lifetime” is the only acceptable answer. An examinee may paraphrase their reference to “working life” and “in lifetime” using “no more than three words” and offer the following synonymous alternatives:

- Their lifetime
- Their life course
- Their life span
- Their working life
- *Etc.*

IELTS’s assessment system is not transparent (Jericho, 2017b). It is not clear if IELTS accept other answers or award half-marks for answers that are imperfect but suggest that the candidate is able to comprehend the reading passage and most likely knows the correct response.

This question unfairly requires the examinee to have clairvoyant ‘powers’ and be able to mind-read one rigid answer selected by IELTS, among numerous competing alternatives.
that are equally correct, convey the same meaning as the official answer and conform to the guidelines as stated in the question.

Questions 6, 7, 8, 9: Grammar

These questions repeat grammar violations discussed in question 5. Referring to a student as ‘average’ is suggestive of a reference to their scholastic abilities and/or achievement.

<table>
<thead>
<tr>
<th>Assessment text</th>
<th>Alternative</th>
</tr>
</thead>
<tbody>
<tr>
<td>Q6. The average person with an Associate’s Degree</td>
<td>On average, a person who holds an Associate’s Degree earns ...</td>
</tr>
<tr>
<td>Q7. The Average Bachelor’s Degree holder</td>
<td>On average, a person who holds a Bachelor’s Degree earns ...</td>
</tr>
<tr>
<td>Q8. The average student</td>
<td>A student at a four year college spends on average ...</td>
</tr>
<tr>
<td>Q9. The average student</td>
<td>A student at a two-year college spends on average ...</td>
</tr>
</tbody>
</table>

The spelling conventions used in this subsection are inconsistent. The hyphen is used in question nine for the word ‘two-year’. In question eight, the hyphen is not used and the words ‘four year’ are used to refer to a senior college. There is no obvious logic for this lack of consistency.

Inadequate proofreading is a recurring problem in IELTS’s official Cambridge series.
Questions 14-20: Inconsistency between practice test sets

“Complete the summary using words from the box below.

Write your answers in boxes 14-20 on your Answer Sheet”

IELTS need to be consistent with the format and structure of its reading section. Some IELTS exams clearly state that the examinee may select the same option twice (e.g. Cambridge University Press, 2015, p. 63). It is not fair to assume that students will conclude that the absence of such an instruction means that they cannot use the same option twice.

Question 34 - mindreading the exact answer

“Complete the chart below.

Choose NO MORE THAN THREE WORDS tor [sic] each answer.”

Rockfish caught today is [sic*] smaller than rockfish caught in the past.

The word “smaller” does not appear in this reading passage. The official answer is grammatically correct, and may be deduced from the sentence that states “The average
size of rockfish in the recreational catch has also declined by several inches since the 1970s, which is indicative of overfishing”.

Note that examinees may use up to three words to fill in the blank section in question 34, as shown above where the word “small” has been inserted.

Smaller is not the only correct answer that a candidate may insert. A candidate may insert other synonyms such as:

- Of lesser size
- Lesser in size

IELTS’s assessment system is not transparent (Jericho, 2017b). It is not clear if IELTS accept other answers or award half-marks for answers that are imperfect but suggest that the candidate had understood the reading passage and seems to know the correct response.

* The word ‘is’ should be replaced with the word ‘are’ to denote reference to plural.

**Question 35 - mindreading the exact answer**

“Complete the chart below.
Choose NO MORE THAN THREE WORDS for each answer.”

Pollution affects orcas more than it does other sea animals.

The word “pollution” does not appear in this reading passage. This answer is correct, and may be deduced from the sentence that states:

“Toxic substances accumulate in higher concentrations as they move up the food chain. Because orcas are the top predator in the ocean and are at the top of several different food chains in the environment, they tend to be more affected by pollutants than other sea creatures.”

Note that examinees may use up to three words to fill in the blank section in question 35, as shown above where the word “pollution” has been inserted.

Pollution is not the only correct answer that a candidate may insert. A candidate may insert other words with the same meaning that are found in the reading passage:

- “Pollutants”
- “Toxic substances”
- “marine toxic waste”
Given that the answer nominated by IELTS, ‘pollution’ does not appear in the reading passage, this suggests that candidates are able to nominate a synonym or another word that is a derivate of a word that is found in the reading passage. Using this logic, examinees may insert other synonyms such as:

- Hazardous substances
- Poisonous substances
- Environmental pollution

There is no obvious logic or rationale that justifies IELTS nominating the word “pollution” as the only correct answer.

IELTS’s assessment system is not transparent (Jericho, 2017b). It is not clear if IELTS accept other answers or award half-marks for answers that are imperfect but suggest that the candidate understands the reading passage and seems to know the correct response.

**Too many questions for 60 minutes**

In my capacity as an IELTS tutor, I have taught dozens of candidates whose advanced English language skills have been independently verified by credible educational institutions. Examples of these candidates includes adults who have spent their entire lives living in a country where English is an official language or the official language.
Furthermore, these persons have also completed high school and university studies that were conducted mostly or exclusively via the English language.

Several candidates who are members of the demographic described above have told me that they always struggle to finish more than three quarters of the Academic reading passages under exam conditions. This includes the completion of numerous official IELTS practice sets at home and multiple actual exams conducted by IELTS.

The author of this paper holds four university Degrees in addition to a Graduate Certificate in Education (Teaching English as a Second Language Teaching). This includes degrees in accounting, economics, education and a Doctorate in Sociology earned at English-speaking universities. Furthermore, he has been speaking English since birth. He has also spent more than 40 years living in countries where English is an official language: Australia, New Zealand, Canada, England and Ireland.

I have never been able to complete more than three quarters of IELTS’s Academic reading tests under exam conditions unless I make random guesses so that I can complete all 40 questions. A major problem with IELTS’s Academic reading test is that it forces candidates to read passages that are sub-discipline specific and use technical jargon. They must navigate questions that use flawed grammatical syntax and they must do so under very strict exam conditions such as a tight time limit.
I propose that the Academic reading section be reduced from 40 questions to 30 questions. I suspect that IELTS’s Academic reading passage in its current form is not designed for most test-takers to be able to finish this section of the exam, with sufficient time to check their answers. I argue that this problem must be reformed as a matter of urgency. The numerous obvious design flaws in this exam may undermine test-taker’s confidence. This in turn may cause examinees to feel compelled to read each question and reading passage carefully and do so multiple times under strict test conditions.

**For comment**

I welcome members of the public to provide constructive feedback on this Research Communique. You may provide this feedback in confidence or request to have this uploaded on the School’s website or GELTR’s website.

**Initial distribution list**

IELTS instructors; IELTS stakeholders (global); Former IELTS test-takers; IELTS registrants; IELTS research academics; Former IELTS staff; IELTS staff; Education Minister, Canada; Education Minister, United Kingdom.
Primary evidence


Other references


Global English Language Tests Review Series

Comparing IELTS’s comprehensive mandatory data collection regime to other major English language test providers

Research Communique Number 6
May, 2017

Jay Jericho D.Soc.Sc Syd
jay@educate.institute

IELTS Review Series

This document is the sixth Research Communique in a series that conducts a critical review of the International English Language Testing System (IELTS) and other global language tests. The scope of this project discusses the pedagogical design and the administrative regime of global English language examinations such as the IELTS.
Historical context

The IELTS assessment is the most popular English language exam for higher education and migration purposes (Cambridge English, 2017a, NP). On its home page, the IELTS (2017b, NP) organization states that “IELTS is the high-stakes English test for study, migration or work.” In 2015, around 2.7 million people sat for this examination in more than 140 countries (Conestoga, 2017, NP).

IELTS (2017d, NP) reports that citizens of the following 40 countries were the top “country of origin” of its examinees in 2015:

Bangladesh, Brazil, Canada, China (People's Republic of), Colombia, Egypt, France, Germany, Greece, Hong Kong, India, Indonesia, Iran, Islamic Republic of, Iraq, Italy, Japan, Jordan, Kazakhstan, Korea, Republic of, Kuwait, Malaysia, Mexico, Nepal, Nigeria, Oman, Pakistan, Philippines, Qatar, Russian Federation, Saudi Arabia, Spain, Sri Lanka, Taiwan, Thailand, Turkey, Ukraine, United Arab Emirates, United States of America, Uzbekistan, Viet Nam.

Business model

The IELTS organization is a tripartite collaborative joint venture that administers the IELTS exam. Table 1 summarizes the service-delivery structure of these three entities.

Table 1:
IELTS consortium partners: business model

<table>
<thead>
<tr>
<th>Member</th>
<th>Status</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>British Council</td>
<td>“a public corporation (in accounting terms)”</td>
<td>British Council (2017f, NP)</td>
</tr>
<tr>
<td>Cambridge Assessment</td>
<td>A “non-teaching department of the University of Cambridge”</td>
<td>Cambridge Assessment Group (2017a, NP)</td>
</tr>
<tr>
<td>IDP Education Limited</td>
<td>A for-profit corporation that is listed on the Australian Stock Exchange.</td>
<td>IDP Education Australia (2017, p. 6)</td>
</tr>
</tbody>
</table>
Revenue

The total annual revenue and financial surpluses/profits earned by members of the IELTS consortium for delivering IELTS goods and services is not disclosed in their Annual Financial Reports. Members of the IELTS consortium report their IELTS revenues as a component of a consolidated revenue item (British Council, 2017b, p. 60; Cambridge Assessment Group, 2015b, p. 7; IDP Education Australia, 2017, p. 17).

Members of the IELTS’s consortium and their authorized agents charge registrants a commercial fee to sit the IELTS exam. IELTS charges a standard fee by test center location.

IELTS does not offer a fee waiver or a reduced fee schedule for those who live in a state of “income poverty” as defined by the United Nations Educational, Scientific and Cultural Organization (2016, p. 160).

Table 2, overleaf, shows the fees schedule in six selected countries as at March, 2017. This data set contains a member nation from each continent, including the Indian subcontinent.
Table 2:

Selected IELTS registration fees by country

As at March 2017

<table>
<thead>
<tr>
<th>Country</th>
<th>(a) Commercial Fee</th>
<th>(b) USD</th>
<th>(c) GDP USD Per capita</th>
<th>(b)/(c) Cost Per capita</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ghana</td>
<td>GHS980</td>
<td>$216</td>
<td>$1,388</td>
<td>15.6%</td>
</tr>
<tr>
<td>India</td>
<td>Rupees 11,300</td>
<td>$173</td>
<td>$1,587</td>
<td>10.9%</td>
</tr>
<tr>
<td>China</td>
<td>RMB 1,960</td>
<td>$284</td>
<td>$7,617</td>
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British Council (2017c; 2017d; 2017e; 2017h; 2017i; IELTS, 2017c).

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Objective

This Research Communiqué compares the mandatory data that IELTS collects on its application form from its fee-paying clients during its registration processes against other major English language testing providers. These major examinations are:

- Pearson PTE Academic
- Test of English as a Foreign Language (TOEFL)
- Test of English for International Communication (TOEIC)
Argument

The data collected via IELTS’s application and registration form goes well beyond the minimum amount of data sourcing that is required to satisfy domestic laws and to ensure the integrity of its examination by validating the identity of each examinee.

IELTS have a legitimate need to identify a candidate. I argue that this process should not extend beyond confirming those details on a person’s birth certificate which also appear on their passport and national identity card. These include the registrant’s:

- First name/s;
- Surname;
- Gender – which may not necessarily be limited to the narrow-minded, retrograde ‘Male’ or ‘Female’ options currently shown on IELTS’s application form;
- Place of birth;
- Date of birth.

I argue that a candidate’s previous IELTS scores, for all tests, should be concealed from all IELTS examiners throughout the first marking procedure and during the remark/appeals process. It is not clear if IELTS examiners are able to review a candidate’s personal and academic data and if they can, how frequently they choose to do so, and for what reasons they may be doing this.
Primary evidence

Data shown in Table 3 identifies a selection of mandatory personal information that IELTS’s examinees must supply as a condition of registration.

Data shown in Table 3 refer to personal details that I argue should have no bearing whatsoever on a candidate’s eligibility to register for the IELTS exam or the ability of IELTS’s staff to confirm the identity of each examinee.

Table 3

Selected mandatory data IELTS registrants must provide on their application form

<table>
<thead>
<tr>
<th>Criteria: verbatim per the application form</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Title (Dr/Mr/Mrs/Miss/Ms)</td>
<td>1</td>
</tr>
<tr>
<td>2. Country of nationality (name)</td>
<td>2</td>
</tr>
<tr>
<td>3. First language (name)</td>
<td>2</td>
</tr>
<tr>
<td>4. Occupation (sector)</td>
<td>2</td>
</tr>
<tr>
<td>5. Occupation (level)</td>
<td>2</td>
</tr>
<tr>
<td>6. Why are you taking the test?</td>
<td>2</td>
</tr>
<tr>
<td>7. If other, please specify</td>
<td>2</td>
</tr>
<tr>
<td>8. Which country are you applying to/intending to go to?</td>
<td>2</td>
</tr>
<tr>
<td>9. Where are you currently studying English (if applicable)?</td>
<td>2</td>
</tr>
<tr>
<td>10. What level of education have you completed?</td>
<td>2</td>
</tr>
<tr>
<td>11. How many years have you been studying English?</td>
<td>2</td>
</tr>
</tbody>
</table>

A copy of IELTS’s application form is available at this link: https://www.ielts.org/-/media/pdfs/application-form.ashx

Source: IELTS (2017a).
IELTS also encourage registrants to supply information about which parties shall use the applicant’s examination results. Supplying this data enables IELTS to identify the full range of purposes that an examinee plans to use their Test Report Form (TRF). Examples of intended purpose include Immigration, which normally requires a higher score than applications to study a Bachelor Degree course.

As stated on page 3 of IELTS’s application form:

“Please give details below of academic institutions/government agencies/professional bodies/employers you would like your results sent to.” (IELTS, 2017a, p. 3)

Office use only

The bottom of page 1 of IELTS’s application form contains a “For office use only” section. This section captures one demographic statistic from the application form - Question 16: “Why are you taking the test” (e.g. Immigration, code 5).

For yet to be determined reasons, IELTS’s application form shows a very strong interest in identifying the country where their fee-paying customer aims to use their IELTS test results. It is questionable whether the application form allows for a ‘not applicable’, ‘private’, or ‘not yet known’ response for this question.
The structure and content of IELTS’s application form assumes that all candidates plan to visit another country, presumably for study or immigration purposes. As shown on page 2 (IELTS, 2017a, p. 2):

“Which country are you applying to/intending to go to?

(tick one box only)  Australia  Canada  New Zealand
Republic of Ireland  United Kingdom  United States of America
other, please specify”

IELTS’s application form does not stipulate that candidates may opt out from answering personal questions that are not required for security identification purposes or for verifying an applicant’s eligibility or suitability for registering for the IELTS exam.

As a condition of registration, applicants must sign a form and agree that:

“2. I certify that the information in my application is complete, true and accurate.”

Furthermore,

“7. I understand that if the details on this form are not completed my application may not be processed.”

Source: British Council (2017a, p. 4).
It is unclear if there are negative repercussions for the candidate if they accidentally or purposefully offer a misleading or incomplete response for personal and demographic data collection questions:

“13. I understand that the IELTS Test Partners have a responsibility to all candidates and Recognising Organisations to ensure the highest confidence in the accuracy and integrity of test results and that the IELTS Test Partners therefore reserve the right to withhold test results temporarily or permanently, or to cancel test results which have been issued, if they consider those results to be unreliable for reasons of suspected malpractice or any other irregularity in the test process [emphasis added].”

Source: British Council (2017a, p. 4).
Comparative data

Table 4 identifies whether TOEFL, TOEIC and Pearson collect data shown in Table 3 as a condition of registration for their respective English language exam.

Table 4

Comparing mandatory data on IELTS’s application form with other major international English language testers

<table>
<thead>
<tr>
<th>Mandatory data IELTS’s application form</th>
<th>TOEFL</th>
<th>TOEIC</th>
<th>Pearson</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Gender</td>
<td>Optional</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Country of nationality</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>First language</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Occupation (sector)</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Occupation (level)</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Why are you taking the test?</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>If other, please specify</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Which country are you applying to/intending to go to?</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Where are you currently studying English (if applicable)?</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>What level of education have you completed?</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>How many years have you been studying English?</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
</tbody>
</table>
Discussion

I argue that the personal and demographic data of IELTS candidates should be concealed from all IELTS examiners throughout the first marking procedure and during the remark/appeals process. Exposure to such demographic data may unfairly influence an examiner’s perceptions of a candidate’s English language abilities at a conscious or subconscious level.

To illustrate this point, please consider this illustration that uses theoretical comparative data set shown in Table 5, overleaf.

IELTS assessment system is not transparent (Jericho, 2017). When reading the data in Table 5, please consider the potential affect that exposure to such data may have on an examiner, senior examiner, supervising examiner or an appeals examiner if they see this data prior to marking a candidate’s exam or when they are marking the exam.
Table 5:

A hypothetical illustration of the subconscious influence that a candidate’s private demographic data may exert over an examiner

<table>
<thead>
<tr>
<th>Mandatory demographic data collected by IELTS</th>
<th>Candidate 1</th>
<th>Candidate 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>First name</td>
<td>Liang</td>
<td>Alistair</td>
</tr>
<tr>
<td>Family name</td>
<td>Xu</td>
<td>Westminster</td>
</tr>
<tr>
<td>Title</td>
<td>Miss</td>
<td>Dr. (Doctor)</td>
</tr>
<tr>
<td>Gender</td>
<td>Female</td>
<td>Male</td>
</tr>
<tr>
<td>Age (Date of birth)</td>
<td>17</td>
<td>45</td>
</tr>
<tr>
<td>Country or region of origin</td>
<td>Asia</td>
<td>Western Europe</td>
</tr>
<tr>
<td>Address</td>
<td>Rural Cambodia</td>
<td>Oxford University Hall of Residence, England</td>
</tr>
<tr>
<td>Country of nationality</td>
<td>Cambodia</td>
<td>United Kingdom</td>
</tr>
<tr>
<td>First language</td>
<td>Cambodian</td>
<td>English</td>
</tr>
<tr>
<td>How many years have you been studying English</td>
<td>1</td>
<td>20</td>
</tr>
<tr>
<td>What level of education have you completed?</td>
<td>Secondary up to 16 years</td>
<td>Postgraduate</td>
</tr>
<tr>
<td>Occupation</td>
<td>Other</td>
<td>Education</td>
</tr>
<tr>
<td>Occupation level</td>
<td>Worker in the home</td>
<td>Employee (Senior Level)</td>
</tr>
<tr>
<td>Scheme code</td>
<td>Australia bound</td>
<td>Private candidate</td>
</tr>
</tbody>
</table>

All data shown in this table must be provided as a condition of enrolling in the IELTS examination. Authority: [https://www.ielts.org/-/media/pdfs/application-form.ashx](https://www.ielts.org/-/media/pdfs/application-form.ashx)
Conclusion

IELTS collect much demographic data that is not required for security identity purposes or to determine the eligibility or suitability of a candidate to sit their exam.

The scope of IELTS’s data collection regime far exceeds data which is collected by Pearson, TOEFL and TOEIC during their candidate registration process.

The reasons why IELTS adopts a rigorous personal data collection regime are not known.

It is not clear if IELTS have a policy that strictly forbids all examiners for referring to a candidate’s demographic data and their prior exam scores at any time during the exam grading process.

For comment

I welcome members of the public to provide feedback on this Research Communique. You may provide this feedback in confidence or request to have this uploaded online.

Initial distribution list

IELTS instructors; IELTS stakeholders (global); Former IELTS test-takers; IELTS registrants; IELTS research academics; Former IELTS staff; IELTS staff; Education Minister, Canada; Education Minister, United Kingdom.
Primary evidence


**Other references**


United Nations (2017), *Data country profile*,
Global English Language Tests Review Series

A critical review of IELTS’s listening test

Research Communique Number 7
May, 2017

Jay Jericho D.Soc.Sc Syd

jay@educate.institute

IELTS Review Series

This document is the seventh Research Communique in a series that conducts a critical review of the International English Language Testing System (IELTS) and other global language tests. The scope of this project discusses the pedagogical design and the administrative regime of global English language examinations such as the IELTS.
Historical context

The IELTS assessment is the most popular English language exam for higher education and migration purposes (Cambridge English, 2017a, NP). On its home page, the IELTS (2017b, NP) organization states that “IELTS is the high-stakes English test for study, migration or work.” In 2015, around 2.7 million people sat for this examination in more than 140 countries (Conestoga, 2017, NP).

IELTS (2017e, NP) reports that citizens of the following 40 countries were the top “country of origin” of its examinees in 2015:

Bangladesh, Brazil, Canada, China (People's Republic of), Colombia, Egypt, France, Germany, Greece, Hong Kong, India, Indonesia, Iran, Islamic Republic of Iraq, Italy, Japan, Jordan, Kazakhstan, Korea, Republic of, Kuwait, Malaysia, Mexico, Nepal, Nigeria, Oman, Pakistan, Philippines, Qatar, Russian Federation, Saudi Arabia, Spain, Sri Lanka, Taiwan, Thailand, Turkey, Ukraine, United Arab Emirates, United States of America, Uzbekistan, Viet Nam.

Most of IELTS’s fee paying clients are citizens of ‘developing economies’ or ‘economies in transition’ as defined by the United Nations (United Nations, 2016, p. 160). IELTS’s business data for ‘country of origin’ is not yet available for 2016.
Business model

The IELTS organization is a tripartite collaborative joint venture that administers the IELTS exam. Table 1 summarizes the service-delivery structure of these three entities.

**Table 1:**

**IELTS consortium partners: business model**

<table>
<thead>
<tr>
<th>Member</th>
<th>Status</th>
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</thead>
<tbody>
<tr>
<td>British Council</td>
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</tr>
<tr>
<td>IDP Education Limited</td>
<td>A for-profit corporation that is listed on the Australian Stock Exchange.</td>
<td>IDP Education Australia (2017a, p. 6)</td>
</tr>
</tbody>
</table>
Revenue

The total annual revenue and financial surpluses/profits earned by members of the IELTS consortium for delivering IELTS goods and services is not disclosed in their Annual Financial Reports. Members of the IELTS consortium report their IELTS revenues as a component of a consolidated revenue item (British Council, 2017b, p. 60; Cambridge Assessment Group, 2015b, p. 7; IDP Education Australia, 2017a, p. 17).

Members of the IELTS’s consortium and their authorized agents charge registrants a commercial fee to sit the IELTS exam. IELTS charges a standard fee by test center location.

IELTS does not offer a fee waiver or a reduced fee schedule for those who live in a state of “income poverty” as defined by the United Nations Educational, Scientific and Cultural Organization (2016, p. 160).

Table 2, overleaf, shows the fees schedule in six selected countries as at March 2017. This data set contains a member nation from each continent, including the Indian subcontinent.
Table 2:

Selected IELTS registration fees by country

As at March 2017

<table>
<thead>
<tr>
<th>Country</th>
<th>(a) Commercial Fee</th>
<th>(b) USD</th>
<th>(c) GDP USD Per capita</th>
<th>(b)/(c) Cost Per capita</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ghana</td>
<td>GHS980</td>
<td>$216</td>
<td>$1,388</td>
<td>15.6%</td>
</tr>
<tr>
<td>India</td>
<td>Rupees 11,300</td>
<td>$173</td>
<td>$1,587</td>
<td>10.9%</td>
</tr>
<tr>
<td>China</td>
<td>RMB 1,960</td>
<td>$284</td>
<td>$7,617</td>
<td>3.7%</td>
</tr>
<tr>
<td>Brazil</td>
<td>BRL800</td>
<td>$277</td>
<td>$11,387</td>
<td>2.4%</td>
</tr>
<tr>
<td>United Kingdom</td>
<td>GBP200 (Immigration)</td>
<td>$247</td>
<td>$46,461</td>
<td>0.5%</td>
</tr>
<tr>
<td>USA</td>
<td>USD$235</td>
<td>$235</td>
<td>$54,306</td>
<td>0.4%</td>
</tr>
</tbody>
</table>

Sources:

British Council (2017c; 2017d; 2017e; 2017j; 2017k; IELTS, 2017c).
(b) Bank of Canada (2017); (c) United Nations (2017).
Impartiality

The Global English Language Tests Review (GELTR) aims to provide an objective review of the scholarly design and global administration of the IELTS examination and substitute global English language tests such as Pearson, TOEIC and TOEFL. This series aims to complement the IELTS “Research Report” series published by IELTS.

Independence

In contrast to IELTS’s Research Report series, the GELTR is not subject to editorial amendments imposed by IELTS’s employees or its affiliates. Furthermore, in contrast to IELTS’s Research Report series, none of the costs involved in preparing and disseminating the GELTR are funded by the IELTS organization or its member partners.

Objective

This Research Communique offers a constructive review of the pedagogical design of the listening component of IELTS’s General and Academic listening test.

IELTS use the same test content and format for the General and Academic versions of its exam (IELTS, 2017d).
Lay person perspective

I argue that the IELTS exam does not deliver a service that is suggestive of its name, *i.e.* an international English language test. Its listening test contains a hidden curriculum that goes far beyond merely examining a person’s ability to interpret audio content spoken in the English language. IELTS’s listening test examines a candidate’s ability to interpret various diagrams and models as they multitask using visual cognitive skills, writing skills and cognitive listening skills under strict exam conditions.

A so-called ‘layperson’ who knows very little about the IELTS may note that a job applicant that they are interviewing was awarded a band score of 5 (mid-range) for their IELTS exam. This interviewer may fairly assume that the IELTS exam demonstrates that the interviewee has average English language listening skills. The interviewer may not appreciate that the interviewee may have excellent English language listening skills, but was disadvantaged by the many design flaws that I argue persist in IELTS’s exam.

This research series does not adopt a theoretical applied linguistics academic approach to frame discussion. This project aims to make my discussion accessible to a wider audience beyond the academic domain. There are multiple stakeholders that have an interest in reforming the IELTS. These audiences include test-takers, college admissions officers, policy makers, governments, employers and IELTS’s business partners.
Evidence

This section analyzes official IELTS exam preparation content. It also cites the opinions of a respected former IELTS examiner who has published more than 100 open-access audio-visual and textual documents about IELTS on the World Wide Web.

Pedagogical design flaws

I refer to the popular idiom ‘set up to fail’. This idiom may refer to a situation where it is very difficult for a subordinate to achieve high success, even if a worker is suitably qualified, highly skilled and acts in good faith. It may not necessarily convey the literal meaning that someone is doomed (e.g. Manzoni & Barsoux, 1998).

I argue that the current design of the IELTS listening exam makes it very difficult for a certain percentage of listeners who possess advanced English language skills to achieve their required band score, even if they diligently prepare for their IELTS exam.

I identify nine major design flaws in IELTS listening test.

Does not replicate real life experiences
IELTS claim that their language examination aims create a test that is authentic, *i.e.*, it replicates real life scenarios where people use language in formal and informal settings (Jakeman & McDowell, 2008, p. 7). To some extent IELTS achieve this objective. However, there are flaws in their listening task that are relatively easy to improve or eliminate.

IELTS’s listening test does not allow examinees the opportunity to clarify what they have heard during the listening test. Allowing candidates to hear spoken content twice increases the authenticity of IELTS’s listening test as it allows a candidate to absorb the context of the artificial environment of a language exam setting (Taylor & Weir, 2012, pp. 476-477).

In real-life situations, it is not uncommon for native and fluent speakers of the English language to ask a speaker to clarify or rephrase a word, sentence, theme or argument that that has been spoken in the English language. There are numerous reasons why a person with advanced listening skills may require clarification. Examples include background interference and momentary losses in concentration that are normal part of human nature.

IELTS does not allow test-takers to stop the listening tape and hear any section of the audio twice (British Council, 2017g). It is simplistic and false to argue that a listener can simply ignore a message that they did not understand and move onto the next question. Put differently, I reject the argument that test-takers can ignore the small number of
words that they do not hear or understand, and still score well for the content that they have understood.

During the listening exam, candidates can never be entirely sure which parts of the audio align to the written questions and answer options on the exam papers. If a candidate mishears just one key word on the audio, they may not realize that the speaker has since moved onto the next question/s on the answer sheet. In effect, misunderstanding one small section of audio, early into the section, can cause a candidate to score zero for the entire listening exam because of a minor lapse in concentration or because of a pedagogical design flaw in IELTS’s exam content.

Suggested solution: allot candidates time to hear the recording twice (Taylor & Weir, p. 477). In its current format, IELTS listening test uses a ‘one strike and you are’ out format. This ‘one strike’ content review format flaw does not exist in IELT’s reading, writing or speaking exams.

IELTS’s listening exam replicates only two popular scenarios in real-life: phone calls and radio broadcasts. Nowadays, many people use audio-visual interactive communications such as Facetime and Skype to communicate via telephone technologies.

When people speak with others via Skype, watch television/cinema and speak with others face-to-face they may gauge meaning from a speaker’s body language, facial expressions
and the physical environment. IELTS’s listening test does not replicate authentic experiences that its examinees encounter in educational contexts (e.g. Taylor & Weir, 2012, p. 477) and other social and professional contexts.

IELTS’s practice materials and exam content use a range of English accents to authenticate real life experience. These accents include Australian, New Zealand, British, Canadian and American pronunciations of the spoken word. I welcome this variety as it is an authentic replication of spoken forms of global English.

I strongly suspect that some speakers who use mainstream American, Canadian and Australian accents on IELTS’s official audio practice tests use fake accents. Some speakers sound like they are native English language speakers from the South of England (e.g. Hertfordshire) who are faking an accent for the purposes of creating diverse exam preparation content. This undermines IELTS’s desire to replicate authentic use of the English language.

The following recording sounds like a British (English) person speaking with a fake Australian accent:

http://takeielts.britishcouncil.org/sites/default/files/audio/BC_LISTENING_Test_1.1_Audio.mp3

Source: British Council (2017f).
Hybrid accents are often genuine, and some people do fake accents in real-life scenarios. Those who seem to use fake accents in IELTS’s practice tests speak with clarity. I raise this possible flaw a ‘food-for-thought’ issue for IELTS to consider and do not flag this as an urgent problem.

Suggested solution: IELTS could hire voice actors who have authentic mainstream regional and national accents.

Hidden curriculum

In a similar vein to the IELTS test a whole, IELTS’s listening component contains a hidden curriculum. IELTS’s listening exam extends far beyond an innocuous test of a person’s ability to listen to verbal content and attribute meaning to audio recordings of speech.

I refer to video instruction on ‘IELTS listening skills’ presented by ‘IELTS Liz’. IELTS Liz is a globally respected online volunteer IELTS instructor. As at November 25, 2017 she has 255,363 subscribers to her YouTube channel (IELTS Liz, 2017).

IELTS Liz (2017) informs her audience “I completed my IELTS examiner training in 2008”. This certification was earned three years after IELTS completed its last major

I concur with Liz (IELTS Liz, 2015a) that IELTS’s official listening exam practice resources test candidates via ten formats. These are:

- “multiple choice
- map completion
- diagram labelling
- form completion
- note completion
- flow chart completion
- sentence completion
- summary completion
- short answer questions
- table completion” (IELTS Liz, 2017).

IELTS’s listening exam tests examinees’ ability to comprehend, navigate and respond to ten alternative forms of data display. Furthermore, they must do so under strict exam conditions such as the time limit imposed. As stated by Liz (2015a), IELTS’s listening test also tests your ability to “multitask”.
The author of this paper has sometimes struggled to interpret what is required of the diagrams that I must complete during the listening test. In all instances, I have used IELTS’s official exam preparation resources. In multiple instances, I have not yet gauged what I must do to complete the diagram at the point in time in which the audio content that presents the listening test material commences.

The author of this paper is a native English language speaker who holds an Honors Degree in Education and a Graduate Certificate in Education (Teaching English as a Second Language) in addition to a Bachelor Degree in Commerce, a Master Degree in Economics and a Doctorate in Sociology. All awards were earned at English speaking universities. He has also been trained to teach IELTS in the Learning Skills Unit by two practicing IELTS examiners at an Australian university.

This personal narrative aims to make the point that IELTS’s language exam is not as straightforward as a layperson may assume. Diagram 1 shows an example of a diagram extracted from an official IELTS practice test (IDP Australia, 2017b).
Figure 1

Authentic official IELTS exam preparation resource
The format of the answer sheet shown in Figure 2 is confusing. This answer sheet requires the reader to keep their eye on two sections of the paper, at the same time, and simultaneously coordinate their reading and writing skills under strict exam conditions, such as a time limit imposed and the opportunity to hear the audio only once.

Figure 2

Authentic official IELTS exam preparation resource

“Questions 26 – 30 Page 7 of original Listening paper

In what time period can the float projects help with the issues 26-30 below?

A  At present

B  In the near future

C  In the long-term future

Write the correct letter, A, B or C, next to questions 26-30.

26 El Niño .....................
Global warming

Naval rescues

Sustainable fishing practices

Crop selection

Source: IDP Australia (2017b)

Suggested solution: IELTS should remove diagram interpretations from its listening test and adopt an exclusive multiple-choice format.

Insufficient time to read the section

I concur with IELTS Liz (2015) that there is insufficient reading time allotted to candidates to read the answer sheet (e.g. maps, tables, diagrams and blank answer sections) prior to the commencement of the audio examination.

Suggested solution: IELTS may extend the reading time by approximately 100%.
Fast sequencing

I concur with IELTS Liz (2015) that some of the answers that the reader hears in the audio content appear in rapid succession. I argue that this tricky test format is not fair. Test-takers are required to multitask their reading, writing, spelling, listening and visual cognitive skills simultaneously. Furthermore, as IELTS are aware, most of their test-takers do not speak English as a first language.

Suggested solution: IELTS should avoid answers that appear in rapid sequence.

Counting words

A content analysis of discussion posted online by former IELTS test-takers who post comments under IELTS Liz’s YouTube presentations (e.g. see IELTS Liz, 2015a) confirms that many examinees remain confused about references to the use of numbers in listening questions.

For example, I cite this text verbatim from an official IELTS practice test:

“Sample Listening A: Questions
SECTION 3 Questions 21 – 30
Questions 21 and 22 Page 5 of original Listening paper
Complete the notes below.

Write NO MORE THAN THREE WORDS AND/OR A NUMBER [emphasis added] for each answer.”

Some students confuse the notion of a ‘numeral’ with the notion of a ‘number’. The number ‘50’ contains two numerals: a ‘5’ and a ‘0’.

Suggested solution: IELTS could switch all response options to a multiple-choice format. This would remove confusion as examinee’s only need to circle the response that they identify as correct, rather than constantly remaining in a state of doubt about whether their response satisfies written instructions that are slightly ambiguous.

Too many acceptable options shown in official practice tests

It is reasonable for IELTS to assume that test-takers will consult official practice materials prior to their exam. These materials are freely available via websites owned by the British Council, IELTS and IDP Australia (e.g. IDP Australia, 2017b).

I rate the quantity of free materials that are made available online as borderline adequate. I call for IELTS to double the amount of free practice materials made available online to increase to at least double to what is currently available. The IELTS consortium claim charitable status and most of their fee-paying clients are citizens of developing nations.
A review of the official free exam practice materials shows that many alternative answers are acceptable for certain responses. On one hand, this situation may be seen to empower the test-taker. The inclusion of multiple correct answers recognizes that there is often more than one way to correctly state an answer using the English language. For example, the time seven o’clock in the morning may be written as 7am or 7 a.m. or seven am etc.

On the other hand, displaying multiple acceptable answers in exam practice material may confuse test-takers – most of whom do not speak English as a first language. Some test-takers may feel overwhelmed by the fact that they can sometimes offer multiple responses that are equally correct.

The following set of texts are a verbatim extract from an official IELTS practice test.

“Sample Listening A: Answer Key

21 cigar
22 13 (different) countries
23 (is) activated
24 (average) (around/about/approximately) 50 kilometres/kilometers
25 (water/ocean/sea) temperature / change(s) in temperature / (water/ocean/sea) temperature change(s) / temperature of water/ocean/sea”
Source: IDP Australia (2017b)

“Listening sample task – Form completion (to be used with IELTS Listening Recording 1)

Answers:

1 Mkere

2 Westall

3 BS8 9PU

4 0.75 m/metres/meters (wide) / three(-)quarter(s) (of) (a) metre/meter (wide) / 
¾ m (wide) / 75 cm(s) (wide)

5 0.5 m/metres/meters (high/deep) / (a) half (a) metre/meter (high/deep) / ½ m 
(high/deep) / 50 cm(s) (high/deep)

6 & 7 in either order (some) books (some) toys

8 1,700”
Confusion caused by multiple acceptable answers can be removed if a multiple-choice format is used that clearly has only one correct answer. For example, please consider this illustration example:

Transcript [Mary]: I have a meeting tomorrow with a nun at half past 7 in the morning.

Multiple choice question.

At what time is Mary’s meeting?

A) 6.15 pm
B) 7.30 am
C) Noon
D) 7.30 pm

Phonemic awareness

IELTS Liz (2015b) claims that IELTS design parts of their listening test in a way that purposefully aims to “test” candidates by frequently referring to numbers that are tens and teens in the audio exam content.
“And of course, IELTS know all the problems that many students have with numbers in English … So IELTS *often* [emphasis added] give you those [paired tens and teens] numbers in the test”.

The notion of ‘paired tens and teens’ refers to numbers that have closely matching phonological structures. Examples of paired tens and teens are:

Thirteen and thirty
Fifteen and fifty
Eighteen and eighty.

I am concerned that a highly respected former IELTS examiner claims that IELTS frequently use spoken words that are known to confuse test-takers and they do so purposefully.

IELTS should never act in a way that aims to trick test-takers. For the record, I note that such claims have never been verified and I have quoted IELTS Liz without contacting her for clarification or comment.
Compound words

IELTS’s official practice materials sometimes require candidates to write responses that may be written a single compound word (e.g. part-time) or as two words (e.g. part time).

For example:

“Listening sample task – Sentence completion (to be used with IELTS Listening Recording 4)

Answers:
27 motivation
28 time(-)management [emphasis added]
29 modules
30 summer school(s)”

IELTS impose a maximum word count on all written answers in the listening test. The inclusion of answers that may be written as compound words or as multiple words may confuse test-takers insofar as they are unsure how to stay within the word limit imposed on written answers.

Suggested solution: IELTS should avoid answers that may be written as compound words (which count as one word) or as multiple words.
Assessment

IELTS’s assessment is not transparent (Jericho, 2017). This is problematic for all test components because it makes it difficult for test-takers to earn credit where credit is due. It also makes it difficult for external reviewers, who are not on IELTS’s payroll, to offer honest, constructive, impartial advice about how IELTS can improve its ‘behind closed doors’ assessment procedures.

According to IELTS Liz (2015a), “if you spell a word incorrectly you will be marked wrong”. IELTS do not award half marks for partially complete answers in the listening test. For example, there may be one letter missing from the word, such as a test-taker providing the answer ‘environmentlly’ instead of ‘environmentally’.

Referring to the example above of ‘environmentally’ – in this hypothetical scenario, the candidate has scribed 14 letters (environmentlly) of 15, i.e. the correct answer (environmentally). Furthermore, these 14 letters are in correct sequence. It is obvious that the candidate has heard and understood audio content. Although the candidate is 93.3% correct, IELTS award a score of zero (0/1) for such a response.

As IELTS does not award fractional marks, it is possible for a test-taker to score zero for the listening exam solely because of their spelling skills. Spelling skills should be examined only during IELTS’s writing tests.
To illustrate this argument, please consider the data shown in Table 3.

**Table 3:**

Understating a candidate’s true examination performance for listening

<table>
<thead>
<tr>
<th>Correct answer</th>
<th>Actual answer</th>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>Generalize/Generalise</td>
<td>Generaliz</td>
<td>0</td>
</tr>
<tr>
<td>Candy shop</td>
<td>Kandy shop</td>
<td>0</td>
</tr>
<tr>
<td>Over the bridge</td>
<td>Over the bridges</td>
<td>0</td>
</tr>
<tr>
<td>515 people</td>
<td>550 people</td>
<td>0</td>
</tr>
<tr>
<td><strong>Total score</strong></td>
<td></td>
<td><strong>0</strong></td>
</tr>
</tbody>
</table>

Analysis of data shown in Table 3 shows how a candidate may score zero out of four for that sub-component of the listening test. A lay person reading another person’s IELTS Test Report Form may conclude that the test-taker is unable to comprehend any aspects of spoken English.

**Pencil**

I do not support IELTS’s policy that requires all candidates *must* use pencil for any part of the test, especially listening (British Council, 2017g). My grave concerns with this issue are the topic of discussion in Research Communique 9.
Conclusion

I argue that IELTS should switch to an exclusive multiple-choice format for its listening test. Furthermore, it should allow candidates the opportunity to stop the recording and/or hear the audio content twice. IELTS’s listening test in its current format lacks authenticity and is a ‘one-strike’ format. These design flaws are of concern. IELTS is a high-stakes test. Some examinees do not have sufficient funds to sit the IELTS exam a second time to navigate the design flaws that they encountered during their first sitting.

The use of multiple choice testing will alleviate test-takers of the need to focus on their spelling and grammar skills during a listening exercise. This change will simplify IELTS’s listening test from its current state which requires complex cognitive multitasking.

For comment

I welcome members of the public to provide feedback on this Research Communique. You may provide this feedback in confidence or request to have this uploaded online.

Initial distribution list

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Primary evidence


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Global English Language Tests Review Series

IELTS’s flawed assessment rubrics:
A focus on band 6.5 for speaking and writing

Research Communique Number 8
May, 2017

Jay Jericho D.Soc.Sc Syd
jay@educate.institute

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IELTS (2017d, NP) reports that citizens of the following 40 countries were the top “country of origin” of its examinees in 2015:

- Bangladesh, Brazil, Canada, China (People's Republic of), Colombia,
- Egypt, France, Germany, Greece, Hong Kong, India, Indonesia, Iran,
- Islamic Republic of, Iraq, Italy, Japan, Jordan, Kazakhstan, Korea,
- Republic of, Kuwait, Malaysia, Mexico, Nepal, Nigeria, Oman, Pakistan,
- Philippines, Qatar, Russian Federation, Saudi Arabia, Spain, Sri Lanka,
- Taiwan, Thailand, Turkey, Ukraine, United Arab Emirates, United States of America, Uzbekistan, Viet Nam.

Business model

The IELTS organization is a collaborative joint venture that administers the IELTS exam. Table 1 summarizes the service-delivery structure of these three entities.

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<tr>
<td>(Brand)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>IDP Education Limited</td>
<td>A for-profit corporation that is listed on the Australian Stock Exchange.</td>
<td>IDP Education Australia (2017, p. 6)</td>
</tr>
</tbody>
</table>
Revenue

The total annual revenue and financial surpluses/profits earned by members of the IELTS consortium for delivering IELTS goods and services is not disclosed in their Annual Financial Reports. Members of the IELTS consortium report their IELTS revenues as a component of a consolidated revenue item (British Council, 2017b, p. 60; Cambridge Assessment Group, 2015b, p. 7; IDP Education Australia, 2017, p. 17).

Members of the IELTS’s consortium and their authorized agents charge registrants a commercial fee to sit the IELTS exam. IELTS charges a standard fee by test center location.

IELTS does not offer a fee waiver or a reduced fee schedule for those who live in a state of “income poverty” as defined by the United Nations Educational, Scientific and Cultural Organization (2016, p. 160).

Table 2, overleaf, shows the fees schedule in six selected countries as at March, 2017. This data set contains a member nation from each continent, including the Indian subcontinent.
Table 2:

Selected IELTS registration fees by country

As at March 2017

<table>
<thead>
<tr>
<th>Country</th>
<th>(a) Commercial Fee</th>
<th>(b) USD</th>
<th>(c) GDP USD Per capita</th>
<th>(b)/(c) Cost Per capita</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ghana</td>
<td>GHS980</td>
<td>$216</td>
<td>$1,388</td>
<td>15.6%</td>
</tr>
<tr>
<td>India</td>
<td>Rupees 11,300</td>
<td>$173</td>
<td>$1,587</td>
<td>10.9%</td>
</tr>
<tr>
<td>China</td>
<td>RMB 1,960</td>
<td>$284</td>
<td>$7,617</td>
<td>3.7%</td>
</tr>
<tr>
<td>Brazil</td>
<td>BRL800</td>
<td>$277</td>
<td>$11,387</td>
<td>2.4%</td>
</tr>
<tr>
<td>United Kingdom</td>
<td>GBP200 (Immigration)</td>
<td>$247</td>
<td>$46,461</td>
<td>0.5%</td>
</tr>
<tr>
<td>USA</td>
<td>USD$235</td>
<td>$235</td>
<td>$54,306</td>
<td>0.4%</td>
</tr>
</tbody>
</table>

Sources:

British Council (2017c; 2017d; 2017i; 2017l; 2017n; IELTS, 2017c).
(b) Bank of Canada (2017); (c) United Nations (2017).
Impartiality

The Global English Language Tests Review (GELTR) aims to provide an objective review of the scholarly design and global administration of the IELTS examination and substitute global English language tests such as Pearson, TOEIC and TOEFL. This series aims to complement the IELTS “Research Report” series published by IELTS.

Independence

In contrast to IELTS’s Research Report series, the GELTR is not subject to editorial amendments imposed by IELTS’s employees or its affiliates. Furthermore, in contrast to IELTS’s Research Report series, none of the costs involved in preparing and disseminating the GELTR are funded by the IELTS organization or its member partners.

Objective

This Research Communique provides a pedagogical critique of IELTS’s flawed assessment rubrics. Part of my discussion centers on the differences between what is required to earn a band score of 6.5 and a band score of 7.0 for speaking and writing. Speaking and writing are the only English language skills where the band score awarded by IELTS is subjective, *i.e.*, it is a personal/professional opinion that can vary between examiners.
IELTS bands 6.5 and band 7.0 attract more critical discussion on the Internet and other forums among many IELTS’s aggrieved fee-paying clients than any other band score.

IELTS band 7.0 is the band score where skilled migrants to Australia and Canada earn bonus points that hundreds of thousands of IELTS’s test takers aim to achieve each year.

Those who do not achieve this band score (or equivalent via another testing company) must pay for another English language test until they receive this band score.

For this reason, it is essential that IELTS prioritizes and publicizes a deep review of how it determines whether a test component is a band 6.5 score or a band 7.0 score.

### Table 3

**Comparing skilled migration English language requirements**

<table>
<thead>
<tr>
<th>Country</th>
<th>IELTS 6 and IELTS 6.5</th>
<th>IELTS 7</th>
</tr>
</thead>
<tbody>
<tr>
<td>Canada</td>
<td>4 points for speaking, reading, writing. Listening scores 4 points for bands 6.0 to 7.0</td>
<td>5 points for speaking, reading and writing. Listening scores 4 points for band 6.0 to 7.0</td>
</tr>
<tr>
<td>Australia</td>
<td>zero bonus points. Applicants must score at least Band 6.0 for all four language skills.</td>
<td>10 bonus points if attained for all four language skills.</td>
</tr>
</tbody>
</table>

**Primary evidence**

**Figure 1**

IELTS’s flawed and subjective assessment rubrics: Writing task 1

<table>
<thead>
<tr>
<th>Band</th>
<th>Task Achievement</th>
<th>Coherence and Cohesion</th>
<th>Lexical Resource</th>
<th>Grammatical Range and Accuracy</th>
</tr>
</thead>
<tbody>
<tr>
<td>9</td>
<td>• fully satisfies all the requirements of the task</td>
<td>• uses cohesion in such a way that it attracts no attention</td>
<td>• uses a wide range of vocabulary with very natural and sophisticated control of lexical features; rare minor errors occur only as 'slips'</td>
<td>• uses a wide range of structures with full flexibility and accuracy, rare minor errors occur only as 'slips'</td>
</tr>
<tr>
<td>8</td>
<td>• covers all requirements of the task sufficiently</td>
<td>• sequencers information and ideas logically</td>
<td>• uses a wide range of vocabulary fluently and flexibly to convey precise meanings</td>
<td>• uses a wide range of structures</td>
</tr>
<tr>
<td></td>
<td>• presents, highlights and illustrates key features/bullet points clearly and appropriately</td>
<td>• manages all aspects of cohesion well</td>
<td>• skilfully uses uncommon lexical items but there may be occasional inaccuracies in word choice and collocation</td>
<td>• the majority of sentences are error-free</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• uses paragraphing sufficiently and appropriately</td>
<td>• produces rare errors in spelling and/or word formation</td>
<td>• makes only very occasional errors or inappropriacies</td>
</tr>
<tr>
<td>7</td>
<td>• covers the requirements of the task</td>
<td>• logically organises information and ideas; there is clear progression throughout</td>
<td>• uses a sufficient range of vocabulary to allow some flexibility and precision</td>
<td>• uses a variety of complex structures</td>
</tr>
<tr>
<td></td>
<td>• (Academic) presents a clear overview of main trends, differences or stages</td>
<td>• uses a range of cohesive devices appropriately although there may be some under-over-use</td>
<td>• uses less common lexical items with some awareness of style and collocation</td>
<td>• produces frequent error-free sentences</td>
</tr>
<tr>
<td></td>
<td>• (General Training) presents a clear purpose, with the tone consistent and appropriate</td>
<td></td>
<td>• may produce occasional errors in word choice, spelling and/or word formation</td>
<td>• has good control of grammar and punctuation but may make a few errors</td>
</tr>
<tr>
<td>6</td>
<td>• addresses the requirements of the task</td>
<td>• arranges information and ideas coherently and there is a clear overall progression</td>
<td>• uses an adequate range of vocabulary for the task</td>
<td>• uses a mix of simple and complex sentence forms</td>
</tr>
<tr>
<td></td>
<td>• (Academic) presents an overview with information appropriately selected</td>
<td>• uses cohesive devices effectively, but cohesion within and/or between sentences may be faulty or mechanical</td>
<td>• attempts to use less common vocabulary but with some inaccuracy</td>
<td>• makes some errors in grammar and punctuation but they rarely reduce communication</td>
</tr>
<tr>
<td></td>
<td>• (General Training) presents a purpose that is generally clear; there may be inconsistencies in tone</td>
<td>• may not always use referencing clearly or appropriately</td>
<td>• makes some errors in spelling and/or word formation, but they do not impede communication</td>
<td></td>
</tr>
</tbody>
</table>

Source: British Council (2017f)

Rubrics are reproduced under the fair use in education copyright exemption provision (Australian Government, 2005).
## Figure 2

IELTS's flawed and subjective assessment rubrics: Writing task 2

### IELTS TASK 2 Writing band descriptors (public version)

<table>
<thead>
<tr>
<th>Band</th>
<th>Task Achievement</th>
<th>Coherence and Cohesion</th>
<th>Lexical Resource</th>
<th>Grammatical Range and Accuracy</th>
</tr>
</thead>
</table>
| 9    | • fully addresses all parts of the task  
      • presents a fully developed position in answer to the question with relevant, fully extended and well supported ideas | • uses cohesion in such a way that it attracts no attention  
      • skilfully manages paragraphing | • uses a wide range of vocabulary with very natural and sophisticated control of lexical features, rare minor errors occur only as ‘slips’ | • uses a wide range of structures with full flexibility and accuracy: rare minor errors occur only as ‘slips’ |
| 8    | • sufficiently addresses all parts of the task  
      • presents a well-developed response to the question with relevant, extended and supported ideas | • sequences information and ideas logically  
      • manages all aspects of cohesion well and appropriately | • uses a wide range of vocabulary  
      • fluidly and flexibly to convey precise meanings  
      • skilfully uses uncommon lexical items but there may be occasional inaccuracies in word choice and collocation  
      • produces rare errors in spelling and/or word formation | • uses a wide range of structures  
      • the majority of sentences are error-free  
      • makes only very occasional errors or inappropriacies |
| 7    | • addresses all parts of the task  
      • presents a clear position throughout the response  
      • presents, extends and supports main ideas, but there may be a tendency to overgeneralise and/or supporting ideas may lack focus | • logically organises information and ideas, there is clear progression throughout  
      • uses a range of cohesive devices appropriately although there may be some under-use  
      • presents a clear central topic within each paragraph | • uses a sufficient range of vocabulary to allow some flexibility and precision  
      • uses less common lexical items with some awareness of style and collocation  
      • may produce occasional errors in word choice, spelling and/or word formation | • uses a variety of complex structures  
      • produces frequent error-free sentences  
      • has good control of grammar and punctuation but may make a few errors |
| 6    | • addresses all parts of the task although some parts may be more fully covered than others  
      • presents a relevant position although the conclusions may become unclear or repetitive  
      • presents relevant main ideas but some may be inadequately developed/unclear | • arranges information and ideas coherently and there is a clear overall progression  
      • uses cohesive devices effectively, but cohesion within and/or between sentences may be faulty or mechanical  
      • may not always use referencing clearly or appropriately  
      • uses paragraphing, but not always logically | • uses an adequate range of vocabulary for the task  
      • attempts to use less common vocabulary but with some inaccuracy  
      • makes some errors in spelling and/or word formation, but they do not impede communication | • uses a mix of simple and complex sentence forms  
      • makes some errors in grammar and punctuation but they rarely reduce communication |

Source: British Council (2017g)
Figure 3

IELTS’s flawed and subjective assessment rubrics: speaking

IELTS Speaking band descriptors (public version)

<table>
<thead>
<tr>
<th>Band</th>
<th>Fluency and Coherence</th>
<th>Lexical Resource</th>
<th>Lexical Resource</th>
<th>Pronunciation</th>
</tr>
</thead>
<tbody>
<tr>
<td>9</td>
<td>* speaks fluently with only rare repetition or self-correction; any hesitation is content-related rather than to find words or grammar * speaks coherently with fully appropriate cohesive features * develops topics fully and appropriately</td>
<td>* uses vocabulary with full flexibility and precision in all topics * uses idiomatic language naturally and accurately</td>
<td>* uses a full range of structures naturally and appropriately * produces consistently accurate structures apart from 'slips' characteristic of native speaker speech</td>
<td>* uses a full range of pronunciation features with precision and subtlety * sustains flexible use of features throughout * is effortless to understand</td>
</tr>
<tr>
<td>8</td>
<td>* speaks fluently with only occasional repetition or self-correction; hesitation is usually content-related and only rarely to search for language * develops topics coherently and appropriately</td>
<td>* uses a wide vocabulary resource readily and flexibly to convey precise meaning * uses less common and idiomatic vocabulary skillfully, with occasional inaccuracies * uses paraphrase effectively as required</td>
<td>* uses a wide range of structures flexibly * produces a majority of error-free sentences with only very occasional inaccuracies or basic/non-systematic errors</td>
<td>* uses a wide range of pronunciation features * sustains flexible use of features, with only occasional lapses * is easy to understand throughout; L1 accent has minimal effect on intelligibility</td>
</tr>
<tr>
<td>7</td>
<td>* speaks at length without noticeable effort or loss of coherence * may demonstrate language-related hesitation at times, or some repetition and/or self-correction * uses a range of connectives and discourse markers with some flexibility</td>
<td>* uses vocabulary resource flexibly to discuss a variety of topics * uses some less common and idiomatic vocabulary and shows some awareness of style and collocation, with some inappropriate choices * uses paraphrase effectively</td>
<td>* uses a range of complex structures with some flexibility * frequently produces error-free sentences, though some grammatical mistakes persist</td>
<td>* shows all the positive features of Band 6 and some, but not all, of the positive features of Band 6</td>
</tr>
<tr>
<td>6</td>
<td>* is willing to speak at length, though may lose coherence at times due to occasional repetition, self-correction or hesitation * uses a range of connectives and discourse markers but not always appropriately</td>
<td>* has a wide enough vocabulary to discuss topics at length and make meaning clear in spite of inappropriacies * generally paraphrases successfully</td>
<td>* uses a mix of simple and complex structures, but with limited flexibility * may make frequent mistakes with complex structures, though these rarely cause comprehension problems</td>
<td>* uses a range of pronunciation features with mixed control * shows some effective use of features but this is not sustained * can generally be understood throughout, though mispronunciation of individual words or sounds reduces clarity at times</td>
</tr>
</tbody>
</table>

Source: British Council (2017h)
Overview

I argue that IELTS’s speaking and writing assessment rubrics contain two major design flaws. First, the rubrics exclusively favors the use of subjective criteria over the use of criteria that may be measured objectively. Second, the band score descriptors do not always place speakers’ and writer’s skills into discrete band score categories.

Subjectivity and objectivity

All assessment criteria shown in Figures 1, 2 and 3 are subjective. The score awarded may vary by examiner. IELTS may switch from using an assessment rubric that is exclusively subjective and incorporate multiple objective criteria.

Examples of criteria that can be measured objectively in the writing assessments include:

- Not meeting minimum word limits imposed
- The frequency of correct and erroneous spelling
- The frequency of correct usage of ‘large’ words (e.g. six or more letters)
- Imposing a penalty for repeating the use of words greater than circa five letters
- Credit for including an introductory/overview paragraph as required.

Examples of objective criteria in the speaking examination include the imposition of a penalty if the examinee:
• Is unable to meet a minimum time limit imposed

• Does not cease speaking within (e.g.) three seconds of an examiner indicating that that the maximum time limit for answering the question has been reached.

IELTS may also award a uniform credit score if the minimum speaking time is achieved.

Disjointed assessment rubrics

IELTS do not use a discrete assessment system for any of its grade score rubrics. Table 4 shows an example of how IELTS’s assessment rubrics contain classifications which are near-identical across four band score descriptors.

Table 4

IELTS’s non-discrete assessment rubrics: Task Achievement

<table>
<thead>
<tr>
<th>Band score</th>
<th>IELTS TASK 1 Writing band descriptors (public version)</th>
</tr>
</thead>
<tbody>
<tr>
<td>9</td>
<td>Fully satisfies all the requirements of the task.</td>
</tr>
<tr>
<td>8</td>
<td>Covers all requirements of the task sufficiently.</td>
</tr>
<tr>
<td>7</td>
<td>Covers the requirements of the task.</td>
</tr>
<tr>
<td>6</td>
<td>Addresses the requirements of the task.</td>
</tr>
</tbody>
</table>

Text in this table is cited *verbatim* from IELTS’s assessment rubric. Source: British Council (2017f)
The inclusion of Table 5 serves to illustrate the frequent repetition of virtually identical assessment criteria throughout IELTS’s subjective marking rubrics.

Band scores 7 and 8 in Table 5 are virtually indistinguishable. The word ‘successfully’ has a stronger connotation of advanced language proficiency than the word ‘effectively’. A speaker who is generally “successful” receives the lowest band score of the three options shown in Table 5.

Table 5

IELTS’s non-discrete assessment rubrics: Lexical resource

<table>
<thead>
<tr>
<th>Band score</th>
<th>IELTS Speaking band descriptors (public version)</th>
</tr>
</thead>
<tbody>
<tr>
<td>8</td>
<td>Uses paraphrase effectively as required.</td>
</tr>
<tr>
<td>7</td>
<td>Uses paraphrase effectively.</td>
</tr>
<tr>
<td>6</td>
<td>Generally paraphrases successfully.</td>
</tr>
</tbody>
</table>

Text in this table is cited verbatim from IELTS’s assessment rubric.

Source, British Council 2017 (h)
Table 6 shows how IELTS’s subjective assessment rubrics separate evaluative criteria across the band scores that are not necessarily mutually exclusive.

**Table 6**

IELTS’s non-discrete assessment rubrics: Task achievement

<table>
<thead>
<tr>
<th>Band score</th>
<th>IELTS TASK 2 Writing band descriptors (public version)</th>
</tr>
</thead>
<tbody>
<tr>
<td>6</td>
<td>Addresses all parts of the task although some parts may be more fully covered than others.</td>
</tr>
<tr>
<td>5</td>
<td>Addresses the task only partially; the format may be inappropriate in places.</td>
</tr>
</tbody>
</table>

Test in this table is cited *verbatim* from IELTS’s assessment rubric.

Source, British Council (2017g)

The band descriptors in Table 6 show how an examinee’s performance against certain criteria is not mutually exclusive. In this example, an examinee that partially addresses the task (*i.e.* band 5) may also address parts of the task more fully than others, notwithstanding their incomplete answer.
Discrete assessment rubric

Tables 7, 8 and 9 illustrate how IELTS can construct discrete assessment categories that vastly improve its current set of flawed subjective rubrics, *i.e.* for speaking and writing.

Table 7 is an example of an assessment rubric that uses objective criteria to place an examinee’s performance for a language skill in one band score only. This example illustrates the assessment of a candidate’s written English language spelling skills.

**Table 7**

**An example of a discrete objective assessment rubric: Writing task 1 and 2**

<table>
<thead>
<tr>
<th>IELTS band score</th>
<th>Spelling: 200-word short discussion task</th>
</tr>
</thead>
<tbody>
<tr>
<td>9</td>
<td>Spells 0 to two words incorrectly.</td>
</tr>
<tr>
<td>8</td>
<td>Spells 3 to 20 words incorrectly.</td>
</tr>
<tr>
<td>7</td>
<td>Spells approximately three quarters of all words correctly.*</td>
</tr>
<tr>
<td>6</td>
<td>Spells approximately two thirds of all words correctly.</td>
</tr>
<tr>
<td>5</td>
<td>Spells approximately half of all words correctly.</td>
</tr>
<tr>
<td>4</td>
<td>Spells 40 to 94 words correctly.</td>
</tr>
<tr>
<td>3</td>
<td>Spells 30 to 39 words correctly.</td>
</tr>
<tr>
<td>2</td>
<td>Spells 10 to 29 words correctly.</td>
</tr>
<tr>
<td>1</td>
<td>Spells less than 10 words correctly.</td>
</tr>
<tr>
<td>0</td>
<td>Does not attempt the task.</td>
</tr>
</tbody>
</table>

* A person who spells 30 words incorrectly may be awarded band score 7.5
### Table 8
An example of a discrete assessment rubric: writing task 2

<table>
<thead>
<tr>
<th>Band score</th>
<th>IELTS writing task 2: Task achievement</th>
</tr>
</thead>
<tbody>
<tr>
<td>9</td>
<td>Addresses all parts of the question without flaws.</td>
</tr>
<tr>
<td>8</td>
<td>Contains one flaw:</td>
</tr>
<tr>
<td></td>
<td>• The absence of supporting ideas</td>
</tr>
<tr>
<td></td>
<td>• Overgeneralization of discussion</td>
</tr>
<tr>
<td></td>
<td>• Repetitive discussion</td>
</tr>
<tr>
<td></td>
<td>• Ideas are listed but not developed via discussion</td>
</tr>
<tr>
<td></td>
<td>• Etcetera.</td>
</tr>
<tr>
<td>7</td>
<td>Contains two flaws:</td>
</tr>
<tr>
<td></td>
<td>• The absence of supporting ideas</td>
</tr>
<tr>
<td></td>
<td>• Overgeneralization of discussion</td>
</tr>
<tr>
<td></td>
<td>• Repetitive discussion</td>
</tr>
<tr>
<td></td>
<td>• Ideas are listed but not developed via discussion</td>
</tr>
<tr>
<td></td>
<td>• Etcetera.</td>
</tr>
<tr>
<td>6</td>
<td>Contains three flaws:</td>
</tr>
<tr>
<td></td>
<td>• The absence of supporting ideas</td>
</tr>
<tr>
<td></td>
<td>• Overgeneralization of discussion</td>
</tr>
<tr>
<td></td>
<td>• Repetitive discussion</td>
</tr>
<tr>
<td></td>
<td>• Ideas are listed but not developed via discussion</td>
</tr>
<tr>
<td></td>
<td>• Etcetera.</td>
</tr>
</tbody>
</table>
Table 9
An example of a discrete assessment rubric: Writing task 1

<table>
<thead>
<tr>
<th>Band Score</th>
<th>Task achievement</th>
<th>Coherence and Cohesion</th>
<th>Vocabulary</th>
<th>Grammar</th>
</tr>
</thead>
<tbody>
<tr>
<td>7</td>
<td>Exceeds the minimum technical requirements. Offers two data illustration examples that are relevant.</td>
<td>Uses cohesive devices correctly for approximately three quarters of the written text.</td>
<td>Uses an advanced range of vocabulary, and this is adequate for the task.</td>
<td>Only uses complex sentences and does so adequately.</td>
</tr>
<tr>
<td>6</td>
<td>Achieves the minimum technical requirements. Offers one data illustration example that is relevant.</td>
<td>Uses cohesive devices correctly for approximately two thirds of the written text.</td>
<td>Uses a limited range of vocabulary, and this is adequate for the task.</td>
<td>Attempts complex sentences and these tend to be as accurate as simple sentences.</td>
</tr>
<tr>
<td>5</td>
<td>Barely achieves the minimum technical requirements and does not offer relevant data illustration examples.</td>
<td>Uses cohesive devices correctly for approximately half of the written text.</td>
<td>Uses a limited range of vocabulary, and this is minimally adequate for the task.</td>
<td>Attempts complex sentences and these tend to be less accurate than simple sentences.</td>
</tr>
</tbody>
</table>
### Table 10
An example of a discrete assessment rubric: Speaking

<table>
<thead>
<tr>
<th>Band Score</th>
<th>Fluency and coherence</th>
<th>Vocabulary</th>
<th>Structure</th>
<th>Pronunciation</th>
</tr>
</thead>
<tbody>
<tr>
<td>7</td>
<td>Produces simple speech fluently and complex communication does not cause fluency problems.</td>
<td>Attempts to use paraphrases and makes errors two or three times.</td>
<td>Produces basic sentence forms with accuracy and makes errors two or three times.</td>
<td>Uses an advanced range of pronunciation features and makes errors two or three times.</td>
</tr>
<tr>
<td>6</td>
<td>Produces simple speech fluently, but more complex communication causes fluency problems on a few occasions.</td>
<td>Attempts to use paraphrases and makes errors for approximately one quarter of the total instances that paraphrases are used.</td>
<td>Produces basic sentence forms with accuracy for approximately three quarters of all sentences.</td>
<td>Uses an advanced range of pronunciation features for approximately three quarters of their spoken structures.</td>
</tr>
<tr>
<td>5</td>
<td>Produces simple speech fluently, but more complex communication causes fluency problems in about half of all instances.</td>
<td>Attempts to use paraphrases and makes errors for approximately half of the total instances that paraphrases are used.</td>
<td>Produces basic sentence forms with accuracy for approximately half of all sentences.</td>
<td>Uses an advanced range of pronunciation features for approximately half of their spoken structures.</td>
</tr>
</tbody>
</table>
General

This section discusses a raft of other pedagogical design flaws that persist in IELTS’s subjective assessment rubrics.

Transparency

IELTS use abstract sentences to discuss assessment criteria in the public version of its assessment rubrics. Research Communique One in this series discusses in detail my grave concerns concerning my strong suspicion that IELTS maintains internal assessment rubrics (Jericho, 2017). I suspect that IELTS use abstract text to publicize its assessment criteria because the internal rubrics contain significantly more detail.

Ambiguity

Multiple band descriptors in IELTS’s subjective assessment rubrics are difficult to comprehend. For example, consider this descriptor for Writing Task 2, band score 7 for the Lexical Resource component of the rubric:

“uses a sufficient range of vocabulary to allow some flexibility and precision”
How does a writer allow for some flexibility and precision in their vocabulary? This ambiguity concerns me, as it is the band score that many of IELTS’s customers require to earn maximum bonus points for a skilled migration visa for Australia and Canada.

In the same vein, I am concerned with the pronunciation criteria published by IELTS for band 7 of its speaking assessment:

“shows all the positive features of Band 6 and some, but not all, of the positive features of Band 8”

What is the meaning of the word ‘some’ in this context? The use of the word ‘all’ in the same passage is suggestive that there is a close association to near-perfection. However, the word ‘some’ in the literal sense implies multiple, *i.e.*, a minimum of two. Such ambiguities in IELTS’s subjective assessments must be addressed as a matter of urgency.

**Minimum word limit imposed on writing tasks**

IELTS’s writing task 1 and writing task 2 impose a minimum word count of 150 words and 250 words respectively (British Council, 2017e). Anecdotal evidence suggests that IELTS impose a penalty on those who do not meet the minimum word limit imposed. For example, I cite the advice posted by former IELTS examiners on their IELTS coaching websites that engage with IELTS test-takers on their discussion boards (*e.g.* IELTS Liz, 2017c).
I call for IELTS to publicize the size of the penalty, if any, that it imposes on those who do not meet the minimum word limit imposed. I also call for IELTS to inform its fee-paying clients which rubric category this penalty may relate to, *e.g.*, Task Achievement.

**Minimum time limit imposed on speaking sections**

The speaking components of the IELTS exam imposes a minimum and maximum time limit for each sub-section of the exam as follows:

**Three sections**

The Speaking test is made up of three sections:

<table>
<thead>
<tr>
<th>Section</th>
<th>Duration</th>
<th>Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Part 1 Introduction and interview</td>
<td>4-5 minutes</td>
<td>The examiner will introduce him or herself and ask you to introduce yourself and confirm your identity. The examiner will ask you general questions on familiar topics, <em>e.g.</em>, home, family, work, studies and interests. This section should help you relax and talk naturally.</td>
</tr>
<tr>
<td>Part 2 Individual long turn</td>
<td>3-4 minutes</td>
<td>The examiner will give you a task card which asks you to talk about a particular topic, including points to include in your talk. You will be given one minute to prepare and make notes. You will then be asked to talk for 1-2 minutes on the topic. You will not be interrupted during this time, so it is important to keep talking. The examiner will then ask you one or two questions on the same topic.</td>
</tr>
<tr>
<td>Part 3 Two-way discussion</td>
<td>4-5 minutes</td>
<td>The examiner will ask you further questions which are connected to the topic of Part 2. These questions are designed to give you an opportunity to discuss more abstract issues and ideas.</td>
</tr>
</tbody>
</table>

Source: British Council (2017m)
Anecdotal evidence suggests that IELTS’s examiners deduct a penalty for those examinees who do not meet the minimum time limit imposed and this negative score is attributed to the ‘fluency’ category. As evidence, I cite the advice posted by former IELTS examiners on their IELTS coaching websites that engage with IELTS test-takers on their discussion boards (e.g. IELTS Liz, 2015a; 2015b).

I call for IELTS to publicly state what penalty score, if any, it imposes on those who do not meet the minimum time limit imposed. If there are a range of penalties dependent on the size of the violation, this information should be disclosed publicly.

**Half marks**

It is possible for candidates to receive half mark band scores in each test component. For example, a speaker may be awarded a band score of 6.5 for their vocabulary:

You will receive IELTS scores based on each for the four skills on a scale of 1 – 9, and you will also be awarded an overall band score. You can score whole (e.g., 5.0, 6.0, 7.0) or half (e.g., 5.5, 6.5, 7.5) bands in each part of the test (British Council, 2017e).

IELTS do not offer information that explains why and how an examiner may award half scores. For example, the difference between a band score of 6.5 and 7.0 is not publicized (British Council, 2017e).
Carte blanche to fail candidates without written justification

IELTS’s examiners reserve the right to award band score zero for a so-called ‘perfect’ answer that contains all traits of a band score 9 response, if the examiner merely suspects that an answer has been memorized (British Council 2017f, p. 2; 2017g, p. 2). The examiner is not required to provide any evidence to the test-taker to justify their subjective opinion and extreme action. IELTS reserve the right to cancel any test-takers examination scores without providing written reasons to their fee-paying clients (British Council, 2017a).

IELTS’s is a very high-stakes exam. This draconian policy has the potential for abuse by an unconscionable rogue examiner who aims to maximize revenue earned at the local branch office level. It can also be abused by rogue examiners who seek to discriminate against a candidate because of factors such as the test-takers age, race, gender or religion.

Conclusion

Writing assessments is not easy. I argue that the numerous structural design flaws that persist in IELTS’s subjective assessment rubrics are relatively easy to eradicate. IELTS should eliminate multiple subjective criteria and switch to objective criteria. It should use rubrics that clearly place an achievement in one band score matrix only. IELTS should publish the internal copy of its assessment rubric. It should not allow its examiners carte blanche to award a score of zero without justification for a high-stakes global exam.
For comment

I welcome members of the public to provide constructive feedback on this Research Communique. You may provide this feedback in confidence or request to have this uploaded on the School’s website or GELTR’s website.

Initial distribution list

IELTS instructors; IELTS stakeholders (global); Former IELTS test-takers; IELTS registrants; IELTS research academics; Former IELTS staff; IELTS staff; Education Minister, Canada; Education Minister, United Kingdom.

Primary evidence


—— (2017c), *ILSC New York*,
Cambridge Assessment Group (2017a), *Our structure*,


Conestoga: Official IELTS Test Center (2017), *Test fee*,

IDP Education Australia (2017), *Annual Report 2016*,

**Other references**

Australian Government (2005), *Fair use and other copyright exceptions: An examination of fair use, fair dealing and other exceptions in the digital age*,

——— (2017), *Immigration FAQ*,
Bank of Canada (2017), *Daily currency converter*,

Canadian Government (2017), *Language testing*,

IELTS Liz (2015a), *IELTS speaking part 2: Will I get a low score if I speak for less than 2 mins?*,

——— (2015b), *IELTS speaking tips: How long should my answer be?*,

——— (2015c), *IELTS writing penalty for being under words*,

Jericho, J. (2017), “*Public Version*” IELTS Assessment Rubrics: A Call for Transparency,


United Nations (2017), *Data country profile*,
Research Communique 9: IELTS dictates that candidates must use pencil to answer 80 questions.

<table>
<thead>
<tr>
<th>Issue</th>
<th>Detail</th>
</tr>
</thead>
<tbody>
<tr>
<td>Primary evidence</td>
<td><a href="http://takeielts.britishcouncil.org/prepare-your-test/test-day-advice/listening-test-advice">http://takeielts.britishcouncil.org/prepare-your-test/test-day-advice/listening-test-advice</a></td>
</tr>
<tr>
<td>Original research</td>
<td><a href="http://www.ielts.agency">www.ielts.agency</a></td>
</tr>
<tr>
<td>Potential abuse of this policy</td>
<td>Rogue examiners may use an eraser to alter a candidate’s test content to maximize revenue at the branch level or in response to bribery.</td>
</tr>
</tbody>
</table>
Global English Language Tests Review Series

An urgent investigation into IELTS’s policy of supplying only one Test Report Form (TRF) to their fee-paying clients.

Research Communique Number 10: Work in Progress
May, 2017

Jay Jericho  D.Soc.Sc  Syd

jay@educate.institute

IELTS Review Series

This document is the tenth Research Communique in a series that conducts a critical review of the International English Language Testing System (IELTS) and other global language tests. The scope of this project discusses the pedagogical design and the administrative regime of global English language examinations such as the IELTS.
IELTS only supply one copy of an original Test Report Form (TRF) to test-takers. IELTS will send up to five copies of the TRF to nominated recipients such as immigration authorities and universities.

In theory, supplying details of nominated recipients on IELTS’s application form is voluntary. In practice, many persons who take the IELTS test:

(a) Plan to send their TRF to multiple institutions;

(b) Must send their original TRF to each institution;

(c) Do not want IELTS examiners to know what scores they require to ‘pass’ their exam. It is not clear if IELTS strictly enforce a ‘blind-marking’ policy.

This research project investigates whether IELTS’s policy of supplying only one original TRF has the effect (whether intended or not intended) of requiring that certain test-takers must advise IELTS of the intended use of their IELTS test to achieve their objective.

I strongly urge test takers to never inform IELTS of the intended use of their TRF.

Prior to taking the exam, you may inquire with the parties that require your IELTS TRF results if they will accept a photocopy of your original TRF that has been certified as a copy of the original by an authorized notary such as an Attorney or a Justice of the Peace.

I plead with institutions such as immigration authorities and colleges to act with compassion and always accept a notarized copy of an official IELTS Test Report Form.

Dr. Jay Jericho
May, 2017
IELTS appeals: profiteering

I estimate that IELTS earns $70 net profit from each academic appeal. The British Council and IDP Australia deliver IELTS’s testing services. IDP Australia report that they earn 40% gross profit on the revenue that they collect for delivering IELTS’s testing services (IDP Australia, 2016, p. 11). I argue that IELTS’s remark process is significantly less costly than the actual testing process which takes place over two days. During the remarking process, IELTS are not required to supervise the candidate. Labor is IELTS’s highest testing cost. I conservatively estimate that IELTS earn a gross profit of approximately 40% for administering its internal academic appeals process. I argue that it is grossly unethical for a corporation that delivers a high-stakes English language exam for citizens of developing nations to profit from its grievances process.