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Global English Language Tests Review Series

IELTS appeals and remarking:

A call for transparency and confirmation of due process

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IELTS Review Series

This document is the third exposure draft 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.

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). Business data for ‘country of origin’ is not yet available for 2016.

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

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

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**

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

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 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 exposure draft aims to stimulate public discussion about factors that are not made public about IELTS appeals and remark procedures. In particular, this exposure draft questions whether personal details and demographic data about IELTS’s candidate remain concealed from the review examiners at all time during 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 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 registrants 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 at all times during 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 at all times during 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**

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

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>

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.

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 exposure draft. 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

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