



11 April 2023

Committee Secretary
Senate Legal and Constitutional Affairs Committee
PO Box 6100
Parliament House
Canberra ACT 2600

Submission regarding Migration Amendment (Australia's Engagement in the Pacific and Other Measures) Bill 2023, and the Migration (Visa Pre-application Process) Charge Bill 2023

Dear Committee Secretary,

As the Country Director for Australia & New Zealand for Duolingo, the world's most popular way to learn a language, I am pleased to provide our perspective on the Migration Amendment. I write chiefly to raise awareness of one of the largest yet most overlooked barriers to migration to Australia - the English language proficiency requirement.

Australia's antiquated restrictions on how to demonstrate English language proficiency

One of the prerequisites for the Pacific Engagement Visa is that applicants must demonstrate their English proficiency.

Unfortunately, Australian policy requires that visa applicants seeking to demonstrate English proficiency to visit one of a few pre-selected English language testing centres. Few, if any, of the expected Pacific countries eligible for such visas have any such testing centres. Most rely on outreach services that visit only in six-monthly-annual intervals. Applicants from many Pacific nations must therefore pay to fly to a different country simply to demonstrate their English proficiency, on top of the significant expense of the tests themselves, costing hundreds or thousands of dollars in total.

This barrier is not unique to the Pacific Engagement Visa. Every year, international students, skilled labourers, and other migrants must deal with this same antiquated requirement. Research finds that that Australian migrants uniformly complained that the cost of such tests was "**intolerably exorbitant**" and "unaffordable to the majority" of their compatriots,¹ and that in their view, the high cost and need for continual retakes of the test was simply a reflection of

¹ Hoang, Ngoc. (2019). Building a Validity Argument for the Use of Academic Language Tests for Immigration Purposes. *Language Education & Assessment*. 2. 135-154.



private companies' profit-seeking from migrants without alternatives.² This barrier is, however, most acutely felt in a program intended for citizens of Pacific Island countries.

A modern, affordable, and secure digital approach

By contrast, elsewhere around the world, countries and universities have eliminated their reliance on paper-based tests and physical test centres. Recent advancements in AI and educational technology have enabled the development of modern, affordable, and secure digital tests that can be accessed nearly anywhere and cost upwards of 80% less — less than AU\$80.

Secure digital English tests in particular are accepted as evidence of proficiency not only by governments, but also by over 4,000 of the top universities around the world, including Australian National University, Imperial College London (UK), Trinity College Dublin (Ireland), University of Toronto (Canada), Yonsei University (South Korea), and more. And among American universities, adoption of digital English testing is near universal, including by MIT, Yale, Stanford, Caltech, Columbia, Duke, Johns Hopkins and thousands more.

We believe that Australia should follow suit. English language proficiency requirements serve an important role in Australia's migration policy, but mandating that such requirements can only be met in inaccessible and expensive test centres introduces a wholly unnecessary and unintended barrier to migration that undercuts the purpose of programs like these.

We therefore respectfully suggest that the Department pilot the use of digital testing to meet its English language proficiency requirement for visas like these. We welcome the opportunity to meet and discuss how such a pilot digital testing can make this program (and others) a success for Australia and The Pacific – a modern, affordable way for applicants to demonstrate their English ability.

Sincerely,

James Holden

Duolingo
Hobart - Tasmania

² M. Rumsey et al. (2016). The consequences of English language testing for international health professionals and students: an Australian case study. *Int. J. Nurs. Stud.* (reporting strong negative perception of traditional paper-based tests as too commercial, given the high cost and need for continual retakes).