

June 9, 2017

Page 1 of 34

To: JAG.Minister@gov.bc.ca
CC: Legislature of British Columbia; B.C. Press, B.C. Rights Advocates
From: Dr. J. Jericho

Re: Suspected breaches of British Columbia's Criminal Code (pages 12 & 30-33)

Ref: <https://www.ieltscanada.ca/ResultsEnquiry>

Dear Attorney General and Justice Minister,

This letter requests your office to investigate whether multiple customer mechanisms administered by IELTS Canada (Vancouver Branch) are tantamount to blackmail, extortion and racketeering. For example, this agency's grievances policy dictates that its fee-paying clients must spend \$176 to have their inquiry investigated. I suspect that this strange and unjust business model process is unprecedented in Canada's modern history.

Most of IELTS Canada's clients are non-Canadian citizens from developing nations who require an IELTS test report for their permanent resident visa applications. As such, many are desperate to secure Canadian residency and will part with their life savings if required.

This vulnerable demographic is susceptible to abuse and ruthless profiteering.

Yours sincerely,

J. Jericho DSocSc Syd

Table of Contents

Part 1:	IELTS: Non-transparent, confusing scoring system	Page 3
Part 2:	IELTS: Flawed pedagogical design and hidden <i>curriculum</i>	Page 15
Part 3:	IELTS: Demographic profiling of personal candidate data	Page 20
Part 4:	Perceptions of IELTS’s business model among test-takers	Page 26

Annex 1:	Language testing sector research: Blackmail and extortion	Page 31
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Executive summary

The vast bulk of the billions of dollars that IELTS earns as revenue is sourced via its lucrative international English language test. IELTS and CELPIP charge *circa* CAD\$275 per test. One test fee equates to *circa* 20% of the average annual income earned by citizens of developing nations such as Cambodia and Bangladesh *etc.* (United Nations, 2017a). IELTS and CELPIP do not offer a discount or fee waiver for those who live in a state of “income poverty” as defined by the United Nations (2017b).

IELTS’s and CELPIP’s application form dictates that candidates must supply the intended use of their language test as a condition of enrolment. Any informed staffer who reads a candidate’s application form may gauge the difference between a pass and fail score.

The more times that a visa applicant fails to reach their target English language score, the more times they need to pay service fees to sit additional IELTS and CELPIP exams.

In recent years, the Australian and New Zealand Governments stripped IELTS of its virtual monopoly status that it had for testing skilled worker and permanent resident applicants.

Part 1

IELTS:

Non-transparent, confusing scoring system

Fact 1: IELTS’s assessment procedures are secretive and lack transparency.

Issue	Detail
Primary evidence	<p>https://takeielts.britishcouncil.org/sites/default/files/IELTS_Speaking_band_descriptors.pdf</p> <p>http://takeielts.britishcouncil.org/sites/default/files/IELTS_task_1_Writing_band_descriptors.pdf</p> <p>https://takeielts.britishcouncil.org/sites/default/files/IELTS_task_2_Writing_band_descriptors.pdf</p>
Original research	<p>“Exposure Draft 1; ‘Public Version’ Assessment Rubrics: A Call for Transparency.”</p> <p>http://www.thefreeschool.education/language-tests-review.html</p>
Discussion	<ul style="list-style-type: none"> • IELTS maintain a set of internal assessment rubrics. • Candidates are never allowed to see examiners’ comments and working notes that relate to their exam content. • Candidates are not permitted to obtain a copy of their assessment content unless they resort to obtaining a court order.
Potential abuse of this policy	<p>Opportunist rogue examiners that aim to maximize revenue generation at the local branch office level.</p>

Fact 2: It is not clear if IELTS enforces a blind-marking assessment policy at all stages during the assessment marking and grade finalization processes.

Issue	Detail
Selected primary evidence	https://www.ielts.org/teaching-and-research/examiner-recruitment-and-training
Original research	<p>“Exposure Draft 1; ‘Public Version’ Assessment Rubrics: A Call for Transparency.”</p> <p>http://www.thefreeschool.education/language-tests-review.html</p>
Discussion	<p>It is not clear if IELTS strictly enforce a blind-marking policy that forbids all examiners and auditing examiners from viewing candidates’ demographic data and prior exam scores at all stages during the examination process and appeals process.</p>
Potential abuse of this policy	<p>An opportunistic rogue examiner may engage in candidate profiling at the branch level to maximize repeat business.</p>

Fact 3: IELTS’s written and spoken assessment matrixes are exclusively subjective for band scores 1 to 9.

Issue	Detail
Primary evidence	<p>https://takeielts.britishcouncil.org/sites/default/files/IELTS_Speaking_band_descriptors.pdf</p> <p>http://takeielts.britishcouncil.org/sites/default/files/IELTS_task_1_Writing_band_descriptors.pdf</p> <p>https://takeielts.britishcouncil.org/sites/default/files/IELTS_task_2_Writing_band_descriptors.pdf</p>
Original research	<p>“Exposure Draft 8; IELTS’s Flawed Assessment Rubrics: A Focus on Band 6.5 for Speaking and Writing.”</p> <p>http://www.thefreeschool.education/language-tests-review.html</p>
Discussion	<p>IELTS’s speaking and writing assessments are subjective. Scores awarded may vary by examiner.</p> <p>IELTS can revert much of this content to an objective test but does not do so for reasons unknown.</p>
Potential abuse of this policy	<p>An opportunistic rogue examiner may engage in candidate profiling at the branch level to maximize repeat business.</p>

Fact 4: IELTS’s assessment rubrics contain dozens of flaws that are easy to fix.

Issue	Detail										
Supporting opinion	<p>Uysal, H. (2010), A critical review of the IELTS writing test, <i>ELT Journal</i>, 64(3), 314-320.</p> <p>http://thuvien.ued.udn.vn:8080/dspace/bitstream/TVDHSPDN_123456789/28910/1/ELT_3.pdf#page=70</p>										
Original research	<p>“Exposure Draft 8; IELTS’s Flawed Assessment Rubrics: A Focus on Band 6.5 for Speaking and Writing.” http://www.thefreeschool.education/language-tests-review.html</p>										
Illustration example	<p>IELTS’s rubrics are near-identical in multiple instances. For example:</p> <table border="1" data-bbox="506 953 1463 1428"> <thead> <tr> <th data-bbox="506 953 699 1031">Score</th> <th data-bbox="699 953 1463 1031">IELTS TASK 1 Writing band descriptors</th> </tr> </thead> <tbody> <tr> <td data-bbox="506 1031 699 1129">9</td> <td data-bbox="699 1031 1463 1129">Fully satisfies all the requirements of the task.</td> </tr> <tr> <td data-bbox="506 1129 699 1228">8</td> <td data-bbox="699 1129 1463 1228">Covers all requirements of the task sufficiently.</td> </tr> <tr> <td data-bbox="506 1228 699 1327">7</td> <td data-bbox="699 1228 1463 1327">Covers the requirements of the task.</td> </tr> <tr> <td data-bbox="506 1327 699 1428">6</td> <td data-bbox="699 1327 1463 1428">Addresses the requirements of the task.</td> </tr> </tbody> </table> <p>Text in this table is cited <i>verbatim</i> from IELTS’s assessment rubric.</p>	Score	IELTS TASK 1 Writing band descriptors	9	Fully satisfies all the requirements of the task.	8	Covers all requirements of the task sufficiently.	7	Covers the requirements of the task.	6	Addresses the requirements of the task.
Score	IELTS TASK 1 Writing band descriptors										
9	Fully satisfies all the requirements of the task.										
8	Covers all requirements of the task sufficiently.										
7	Covers the requirements of the task.										
6	Addresses the requirements of the task.										
Potential dire Outcome	<p>A candidate who has excellent reading, writing, listening and speaking English language skills may receive a marginal ‘fail’ band score for one or more English language skills for no fault of their own. Their score may result from one or more of the numerous design flaws that persist in IELTS’s assessment rubrics.</p>										

Fact 5: IELTS examiners reserve the right to award a band score of zero to any candidate for written assessments that are ‘perfect answers’ without providing written or verbal justification to the candidate.

Issue	Detail
Primary evidence	<p>http://takeielts.britishcouncil.org/sites/default/files/IELTS_task_1_Writing_band_descriptors.pdf https://takeielts.britishcouncil.org/sites/default/files/IELTS_task_2_Writing_band_descriptors.pdf https://www.ieltscanada.ca/pdf/IELTS_Application_Form_2014.pdf</p>
Original research	<p>“Exposure Draft 8; IELTS’s Flawed Assessment Rubrics: A Focus on Band 6.5 for Speaking and Writing.” http://www.thefreeschool.education/language-tests-review.html</p>
Discussion	<p>IELTS’s application form and assessment rubrics allow examiners <i>carte blanche</i> authority to award a score of zero for any writing task, without providing justification, merely because the examiner suspects that the exam response is memorized. A grade score of zero may be awarded for an answer that is flawless insofar as it fully addresses the set question.</p>
Potential abuse of this policy	<p>An opportunistic rogue examiner may engage in candidate profiling at the branch level to maximize repeat business. A rogue examiner may discriminate against a person due to their age, gender, religion, race, ethnicity, <i>etc.</i></p>

Fact 6: IELTS reserve the right to cancel any candidate’s examination scores and they may not provide written justification to a candidate to explain the specific reasons why this Test Report Form is cancelled.

Issue	Detail
Primary evidence	https://www.ieltscanada.ca/pdf/IELTS_Application_Form_2014.pdf
Original research	<p>“Exposure Draft 8; IELTS’s Flawed Assessment Rubrics: A Focus on Band 6.5 for Speaking and Writing.”</p> <p>http://www.thefreeschool.education/language-tests-review.html</p>
Discussion	<p>IELTS reserve the right to cancel any candidate’s Test Report Form.</p> <p>IELTS require their fee-paying clients to agree to this term as a condition of registration per IELTS’s 8-page application form. There is much anecdotal evidence on the Internet to suggest that IELTS often does not acknowledge or respond to written requests from their fee-paying clients to provide justification for why they have cancelled their test results.</p>
Potential abuse of this policy	<p>An opportunistic rogue examiner may cancel a candidate’s Test Report Form to maximize repeat business.</p>

Fact 7: IELTS forces candidates to use pencil to answer 80 questions.

Issue	Detail
Primary evidence	http://takeielts.britishcouncil.org/prepare-your-test/test-day-advice/listening-test-advice
Original research	<p>“Exposure Draft 9; IELTS’s Policy Insists that Candidates use Pencil to Answer 80-Multiple Choice Questions.”</p> <p>http://www.thefreeschool.education/language-tests-review.html</p>
Discussion	<p>Rogue examiners and administrators have infiltrated IELTS in the past. This has been documented by the police, courts and media. Examples:</p> <p>http://www.thehindu.com/todays-paper/tp-national/tp-andhrapradesh/Agency-Isquonailedrsquo-for-fraud-in-IELTS/article16505230.ece</p> <p>http://www.watoday.com.au/wa-news/man-admits-wa-uni-bribe-scam-was-stupid-20110816-1ivtc.html</p>
Potential abuse of this policy	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.

Fact 8: IELTS do not provide written assessment feedback to their clients.

Issue	Detail
Primary evidence	http://takeielts.britishcouncil.org/find-out-about-results/results-process/test-report-form
Original research	“Exposure Draft 1; ‘Public Version’ IELTS Assessment Rubrics: A Call for Transparency.” http://www.thefreeschool.education/language-tests-review.html
Discussion	IELTS do not provide any written feedback to their clients to justify the score that they have been awarded for their reading, writing, listening and speaking skills.
Potential abuse of this policy	An opportunistic rogue examiner may engage in candidate profiling at the branch level to maximize repeat business.

Fact 9: IELTS charge a “service fee” of *circa* CAD\$176 to aggrieved customers who wish to have their exam results checked and reviewed.

Issue	Detail
Primary evidence	http://idpielts.me/results/request-a-re-mark/
Original research	<p>“Exposure Draft 3; IELTS Appeals and Remarking: A Call for Transparency and Confirmation of Due Process.”</p> <p>http://www.thefreeschool.education/language-tests-review.html</p>
Discussion	Please read Exposure Draft 8. This high fee may unfairly act as a deterrent and undermine justice in the education system.
Potential abuse of this policy	<p>An opportunistic rogue examiner may engage in candidate profiling at the branch level to maximize repeat business. IELTS charge a fee of <i>circa</i> CAD\$176 to investigate a person’s complaint about their exam scores. This equates to around 80% of the cost of taking a full exam. This high barrier may discourage test-takers from querying their exam results. A candidate who has been defrauded by a rogue examiner may opt to sit a fresh exam if they do not achieve the scores required for a skilled Canadian work visa.</p>

Fact 10: IELTS will not release a candidate’s exam content and examiner’s comments / examiner’s working notes to their fee-paying clients. The only way that a candidate can confirm the details of IELTS’s ‘behind closed doors’ secretive examination policy is to obtain a court order.

Issue	Detail
Sample Primary evidence	http://takeielts.britishcouncil.org/teach-ielts/ielts-teaching-faq
Original research	<p>“Exposure Draft 1; ‘Public Version’ IELTS Assessment Rubrics: A Call for Transparency.”</p> <p>http://www.thefreeschool.education/language-tests-review.html</p>
Discussion	<p>This policy lacks transparency. Most universities in democratic countries allow an aggrieved person who has lodged an official complaint to inspect their exam paper in the presence of management.</p>
Potential abuse of this policy	<p>An opportunistic rogue examiner may engage in candidate profiling at the branch level to maximize repeat business.</p>

Fact 11: IELTS does not publicize a catalogue of its prior exams.

Issue	Detail
Sample primary evidence	https://www.ieltscanada.ca/Preparation
Original research	<p>“Exposure Draft 7; A Critical Review of IELTS’s Listening Test”</p> <p>http://www.thefreeschool.education/language-tests-review.html</p>
Discussion	<p>IELTS release a narrow specimen of prior exam content as practice material. It is unclear which content that is provided as practice material was previously used as official exam content.</p> <p>This secretive policy shields IELTS from independent review and scrutiny by peer educators who are not on IELTS’s payroll.</p>
Potential abuse of this policy	<p>IELTS are barely accountable in the public sense for any gross irregularities in their exam, barring extreme intervention such as an audit inspection from a Government agency such as Consumer Affairs. I am not aware of any cases where a government regulator or court has audited IELTS’s standards.</p>

Part 2:

IELTS:

Flawed pedagogical design and hidden *curriculum*

Original primary data research relevant to this entire section:

“Exposure Draft 2; The Hidden Curriculum, Absent Syllabus and Severe Complexity of the Academic and General Writing Task 2 Component of the IELTS.”

“Exposure Draft 4; IELTS Speaking Questions: Non-universal Content, Hidden Curriculum and the Absence of Choice.”

“Exposure Draft 5; IELTS Academic Reading Questions: Pedagogical Design Flaws.”

“Exposure Draft 7: A Critical Review of IELTS’s Listening Test.”

Source:

<<http://www.thefreeschool.education/language-tests-review.html>>. Accessed 5 June 2017.

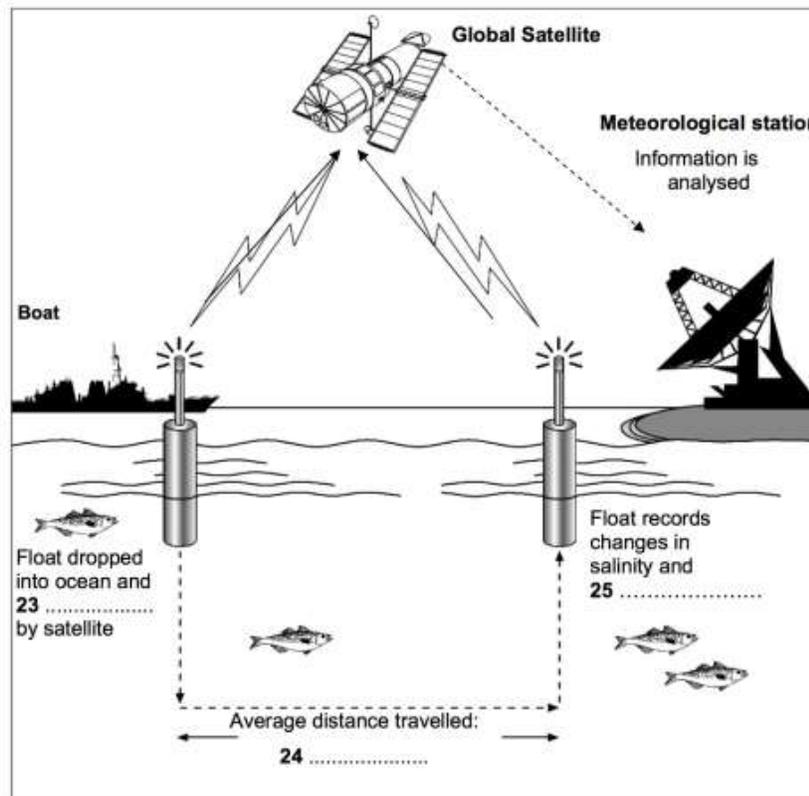
Fact 12: IELTS’s exam contains dozens of obvious pedagogical design flaws that are relatively easy to fix. IELTS has never rectified the vast bulk of these problems since it finalized its last major reform audit in 2005.

Issue	Detail
Primary evidence	http://ieltscanadatest.com/prepare-for-ielts/practice-tests/
Sample original research	<p>“The Hidden Curriculum, Absent Syllabus and Severe Complexity of the Academic and General Writing Task 2 Component of the IELTS.”</p> <p>http://www.thefreeschool.education/language-tests-review.html</p>
Discussion	<p>Hundreds of logical design flaws may be found in IELTS’s official exam practice resources. These flaws exist in all language skill test components: reading, writing, listening and speaking.</p>
Potential abuse of this policy	<p>A skilled migrant may not realize their target score of <i>e.g.</i> band 7.0 because they have been distracted or penalized by multiple pedagogical design flaws in the exam content.</p>

Fact 13: The international English language testing exam is not solely a global English language test – it is an advanced scholastic/aptitude test.

Issue	Detail
Primary evidence	http://idpielts.me/prepare-ielts/free-ielts-practice-tests/
Original research	<p>“Exposure Draft 2; The Hidden Curriculum, Absent Syllabus and Severe Complexity of the Academic and General Writing Task 2 Component of the IELTS.”</p> <p>http://www.thefreeschool.education/language-tests-review.html</p>
Discussion	<p>IELTS speaking and writing content tests a persons’ general knowledge on virtually any scholastic topic. IELTS’s hidden curriculum is dominantly Western-centric.</p>
Potential abuse of this policy	<p>Various agents may lobby foreign Governments to adopt the IELTS test as a convenient proxy front to support its restrictive visa issuing policy. Foreign governments may naïvely assume that IELTS is merely an English language test because of the misleading name of this complex scholastic-language aptitude test.</p>

Figure 1 – An example of IELTS’s hidden curriculum
IELTS ‘Listening’ test: Official exam preparation resource



Source: IDP Australia (2017)

IELTS’s listening test does not conduct an innocuous test of a person’s ability to interpret audio. Test-takers are required to multi-task their reading, writing (spelling) and listening skills simultaneously. They may be required to interpret discipline-specific diagrams under strict exam conditions. Unlike many/most real-life scenarios, IELTS uses a one-strike system. There is no opportunity to clarify what the speaker on an audio cassette says. It is possible for a candidate who is a native speaker of the English language to score zero for a listening test component because they misheard one key word at the start of the exercise.

Fact 14: IELTS administers a complex, Western-centric hidden curriculum that is not supported by an adequate syllabus document.

Issue	Detail
Primary evidence	http://takeielts.britishcouncil.org/prepare-test/free-practice-tests
Original research	<p>“Exposure Draft 2; The Hidden Curriculum, Absent Syllabus and Severe Complexity of the Academic and General Writing Task 2 Component of the IELTS.”</p> <p>http://www.thefreeschool.education/language-tests-review.html</p>
Discussion	<p>Please refer to the exposure drafts listed in the sub-section partition of this document. For example, IELTS’s writing task 2 tests a person’s general knowledge on a range of topics such as moral philosophy, critical pedagogy, technology and social policy.</p>
Potential abuse of this policy	<p>Various agents may lobby foreign Governments to adopt the IELTS test as a convenient proxy to support its restrictive visa policy. Foreign governments may naïvely assume that IELTS is merely an English language test because of the misleading name of this test.</p>

Part 3:

IELTS:

Demographic profiling of personal candidate data

Fact 15: IELTS and CELPIP collects significantly more private demographic candidate profile data than Pearson, TOEFL and TOEIC.

Issue	Detail
Primary evidence	<p>https://www.ieltscanada.ca/ApplicationForm</p> <p>https://www.ets.org/s/toefl/pdf/iBT_reg_form.pdf</p> <p>http://wie.ac.nz/download/TOEIC_Application_Form.pdf</p> <p>https://www.celpip.ca/faq/get-registration-form-2/</p> <p>http://pearsonpte.com/book/</p>
Original research	<p>“Exposure Draft 6; Comparing IELTS’s Comprehensive Mandatory Data Collection Regime to Other Major English Language Test Providers.”</p> <p>http://www.thefreeschool.education/language-tests-review.html</p>
Discussion	<p>IELTS have not publicly declared that all examiners, including supervising, appeals and audit examiners are shielded from accessing a candidate’s demographic data and prior exam scores.</p>
Potential abuse of this policy	<p>An opportunistic rogue examiner may engage in candidate profiling at the branch level to maximize repeat business.</p>

Comparing mandatory data on IELTS’s application form

with other major international English language testers

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

*CELPiP’s local form collects other demographic categorization profile data such as “How many years of your life have you spent in an English-speaking country?” Authority:

https://www.celpip.ca/wp-content/uploads/2016/12/celpip_registration_form-1.pdf

Fact 16: IELTS demands that all registrants inform them of their intended use of the examination. IELTS will not register a person who refuses to supply this private data.

Issue	Detail
Primary evidence	https://www.ieltscanada.ca/ApplicationForm
Original research	<p>“Exposure Draft 6; Comparing IELTS’s Comprehensive Mandatory Data Collection Regime to other Major English Language Test Providers”</p> <p>http://www.thefreeschool.education/language-tests-review.html</p>
Discussion	<p>IELTS reserve the rights to cancel the Test Report Form results of any person who is found to have understated or withheld private demographic data. This may apply even if this data has absolutely no relevance whatsoever to the ability of IELTS to confirm a candidate’s identity or their eligibility for sitting an IELTS exam.</p>
Potential abuse of this policy	<p>An opportunistic rogue examiner may engage in candidate profiling at the branch level to maximize repeat business.</p>

Theoretical example of candidate profiling for illustration purposes

Demographic data collected by IELTS	Candidate 1	Candidate 2
First name	Liang	Alistair
Family name	Xu	Westminster
Title	Miss	Dr. (Doctor)
Gender	Female	Male
Age (Date of birth)	17	45
Country or region of origin	Asia	Western Europe
Address	Rural Cambodia	Oxford University
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>

Fact 17: IELTS strict policy of supplying only one Test Report Form has the consequences of requiring that certain test-takers must inform IELTS which institution/s the candidate plans to send their scores to.

Issue	Detail
Primary evidence	http://takeielts.britishcouncil.org/find-out-about-results/results-process/test-report-form
Original research	<p>“Exposure Draft 10; An Urgent Investigation into IELTS’s Policy of Supplying Only One Test Report Form (TRF) to their Fee-paying clients.”</p> <p>http://www.thefreeschool.education/language-tests-review.html</p>
Discussion	<p>This policy may have a ‘stealth’ effect that forces certain candidates to inform IELTS of the intended use of the TRF, when these candidates have a very strong desire to conceal this information from IELTS.</p> <p>Many people are required to send their original TRF to more than one recipient. At present IELTS will only supply one copy of the original TRF to the test-taker. This contrasts with universities who will supply multiple original copies of a transcript for a small fee.</p>
Potential abuse of this policy	An opportunistic rogue examiner may engage in candidate profiling at the branch level to maximize repeat business.

Part 4:

Perceptions of IELTS's business model among test-takers

Issue 18: The volume of complaints targeted against IELTS is possibly unprecedented in the modern history of English language testing.

Issue	Detail: Work in progress
Sample evidence	<p>http://www.canadavisa.com/canada-immigration-discussion-board/threads/ielts-score-wrong-a-scam-or-joke.274648/</p> <p>http://ielts-sucks.blogspot.com/2011/01/ielts-bottom-line.html</p> <p>http://forums.whirlpool.net.au/archive/2207554</p> <p>http://www.expatform.com/expats/australia-expat-forum-expats-living-australia/931586-ielts-band-8-a-2.html</p> <p>https://www.facebook.com/IeltsIsFraud/</p> <p>https://www.dawn.com/news/1199814</p> <p>https://www.consumercomplaints.in/idp-ielts-fraud-c1315651</p> <p>https://complainaboutielts.wordpress.com/2017/01/19/why-the-ielts-test-is-a-scam-and-what-you-can-do-about-it/</p> <p>https://www.facebook.com/Ielts-Has-Become-Money-Making-Business-in-Australia-226105794078429/</p>
Discussion	<p>My preliminary data analysis suggests that the level of criticism levelled towards IELTS may exceed that targeted against any other English language testing agency since the proliferation of the Internet. I suspect that the number of criticisms directed at IELTS exceed the combined total number of negative comments posted by clients of TOEFL, TOEIC and Pearson.</p>

Fact 19: There is a perception among members of the international community that some IELTS branches corruptly manipulate band scores by awarding a candidate a marginal fail of 0.5 for one skill and do so over multiple tests as a mechanism to maximize repeat sales.

Issue	Detail
<p>Sample</p> <p>Primary evidence</p>	<p>http://www.expatform.com/expats/australia-expat-forum-expats-living-australia/931586-ielts-band-8-a-2.html</p> <p>https://www.complaintboard.in/complaints-reviews/idp-ielts-1193458.html</p> <p>https://www.pomsinoz.com/topic/106150-ielts-the-great-money-making-endeavour/</p> <p>http://ielts-simon.com/ielts-help-and-english-pr/2012/07/ielts-advice-asking-for-a-re-mark.html</p> <p>http://www.thepetitionsite.com/284/958/691/carry-out-a-public-audit-of-ielts-academic-writing-test-results-for-2014-15/</p> <p>http://www.expatform.com/expats/australia-expat-forum-expats-living-australia/160146-ielts-revaluation-please-advise.html</p> <p>https://medium.com/@gregortega/my-ielts-vs-pte-experience-8032615d52e3</p>
<p>Original research</p>	<p>The link above (medium.com) is a good summary of the many grievances among IELTS test-takers that I am exploring. A dominant theme in the evidence is that a corrupt IELTS examiner may read a candidate’s intended exam use data and lower a candidate’s writing and/or speaking exam scores. The mark awarded for both skills is subjective and is easiest to manipulate.</p>

Achieving a band score of 6.5 aligns with the ‘marginal fail’ outcome for many IELTS test-takers. Hundreds of thousands of test-takers must earn maximum bonus points for their English language skills to qualify for a skilled migrant visa for Canada and Australia.

Comparing skilled migration English language requirements

Country	IELTS 6 and IELTS 6.5	IELTS 7
Canada	4 points for speaking, reading, writing. Listening scores 4 points for bands 6.0 to 7.0	5 points for speaking, reading and writing. Listening scores 4 points for band 6.0 to 7.0
Australia	zero bonus points. Applicants must score at least band 6.0 for all four language skills.	10 bonus points if attained for all four language skills.

Source: Australian Government (2017); Canadian Government (2017).

Fact 20: IELTS only validate their test scores for two years. After this period, former IELTS customers must purchase new exam service/s. Each test costs *circa* CAD\$275 per attempt.

Issue	Detail
<p>Sample Primary evidence</p>	<p>https://support.cambridgeenglish.org/hc/en-gb/articles/202838296-How-long-are-my-results-and-certificate-valid-for-</p> <p>There are numerous posts on the Internet that argue that this policy is cynically designed to maximize cash earnings and serves no legitimate purpose. Examples:</p> <p>https://www.englishforums.com/English/WhyIeltsScoresValidYears/wqzmx/post.htm http://ielts-sucks.blogspot.com/2011/01/ielts-bottom-line.html http://amhornedomd.blogspot.com/2008/04/ielts-money-making-scam.html http://britishexpats.com/forum/immigration-visas-citizenship-australia-32/ielts-hell-588539/ http://melbournecitycouncil.blogspot.com/2011/03/ielts-ripping-0ff-australia.html</p>
<p>Discussion</p>	<p>This policy contradicts the services provided by virtually all colleges that validate a candidate’s performance indefinitely and provide copies of original transcripts for a small fee of <i>circa</i> USD\$20 per copy. A person who earns a professional degree (<i>e.g.</i> Law, Medicine) may validate this qualification for life to maintain registration. I ask this question of IELTS – if your exam is as rigorous as you publicly claim, why are you not confident that your Test Report Forms can stand the test of time?</p>

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 earn 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.

Annex 1

Language testing sector research: Blackmail and extortion

Current research – blackmail, extortion and racketeering in the language tests sector

<p>Issue</p>	<p>Detail: Global language testing in general</p>
<p><i>Modus operandi</i></p>	<p>Potentially any international English language testing agency that:</p> <p>(a) Reserves the right to cancel a candidate’s test report scores without providing written detailed justification for the reasons why they do this AND/OR awards a score of zero for partially/fully correct exam responses and does not provide justification for this score;</p> <p>And</p> <p>(b) Encourages and/or allows the test-taker that has been affected the opportunity to sit for another exam subject to paying a further fee.</p>
<p>Original research</p>	<p>This project is work in progress:</p> <p>http://www.thefreeschool.education/language-tests-review.html</p> <p>https://www.youtube.com/watch?v=Z_sD0osoI3Y&t=8s</p>
<p>Discussion</p>	<p>I question whether the business practices of certain international English language testing agencies are tantamount to systemic blackmail, extortion and racketeering on a massive global scale. Please bear in mind that most people who apply for a permanent residency visa come from developing countries. They are desperate to secure a better life in a developed nation such as Canada. I call for the Attorney General to take legal advice on this practice as a matter of absolute urgency.</p>

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