

IELTS Research Reports Online Series

**An investigation of the language assessment interests and
needs of professional registration bodies in the UK:
An unconsidered perspective?**



John Pill and Susan Sheehan

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Through in-depth interviews, the researchers engaged with representatives of bodies for professional registration in the UK to investigate how they understood and, in many cases, applied English language proficiency requirements, tests and test scores. The aim was to provide a better understanding of these test users' interests and concerns, consequently allowing language testing professionals to consider how they might communicate more effectively with staff members at registration bodies about their use (or not) of tests of English as a second/foreign language in pathways to professional registration and offer support in decision-making on this topic.

Funding

This research was funded by the IELTS Partners: British Council, IDP IELTS, and Cambridge University Press & Assessment. Grant awarded 2023.

Acknowledgements

The researchers would like to thank the IELTS Joint Funded Research Program for the funding to carry out this study. We would also like to thank Mina Patel and Emma Bruce at the British Council for their flexibility as we worked on this project.

We thank the representatives of the registration bodies for agreeing to be interviewed for this study. We recognise the time involved preparing for, and completing, the interviews.

We thank Alan Addison and his IELTS colleagues at the British Council for inviting us to attend the meeting of the Professional Associations English Language Forum, creating an opportunity to invite representatives of registration bodies to participate in this study.

We thank Geisa Davila Perez and Thuy Thai for their major contributions to this project by providing research assistance, in particular reviewing the literature and checking the websites and publications of UK registration bodies.

We are grateful to the two anonymous reviewers who provided insightful feedback on the report.

Publishing details

Published by the IELTS Partners: British Council, IDP IELTS, and Cambridge University Press & Assessment © 2025.

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How to cite this report

Pill, J., & Sheehan, S. (2025). An investigation of the language assessment interests and needs of professional registration bodies in the UK: An unconsidered perspective? *IELTS Research Reports Online Series*, No. 4/25.

British Council, IDP IELTS, and Cambridge University Press & Assessment.

Available at: <https://ielts.org/researchers/our-research/research-reports>

Introduction

This study by Pill and Sheehan was conducted with support from the IELTS Partners (British Council, IDP: IELTS Australia, and Cambridge University Press & Assessment), as part of the IELTS joint-funded research program.

The research was funded by the British Council and IDP: IELTS Australia under this program, which complements those conducted or commissioned by Cambridge University Press & Assessment and together inform the ongoing validation and improvement of IELTS. A significant body of research has been produced since the joint-funded research program started in 1995, with over 200 empirical studies receiving grant funding. After undergoing a process of peer reviews and revision, many of the studies have been published in academic journals, in several IELTS-focused volumes in the *Studies in Language Testing* series (<http://www.cambridgeenglish.org/silt>), and in the *IELTS Research Reports* series. Since 2012, to facilitate timely access, the research reports have been published on the [IELTS website](#) immediately after completing the peer review and revision process.

Pill and Sheehan's study examines how professional registration bodies in the UK engage with language assessment, focusing on their interests and needs. These bodies, which operate outside the traditional language testing domain, are responsible for regulating the skills of applicants and workers in specific fields, including English proficiency and communication. Despite their pivotal role in ensuring professionals possess adequate language skills, their perspectives have been largely underrepresented in language assessment research. This study addresses that gap, contributing to a deeper understanding of the language assessment literacy (LAL) of professional registration bodies.

Using qualitative methods, the researchers conducted background research through websites and publications, alongside in-depth interviews with representatives from various registration bodies. The aim was to investigate how these organisations perceive and implement English language assessment, particularly in relation to tests, scoring systems, and proficiency requirements.

A key finding of the study is the widespread recognition of the importance of language and communication skills across professional registration bodies; however, the approaches to assessing these skills vary considerably. Some bodies adopt informal methods, relying on spoken or written performance during the application process, while others require formal language testing, with commercial and direct tests — especially when applicants' qualifications differ from UK standards.

This research makes a valuable contribution to the evidence base on LAL within professional registration bodies in the UK. It also highlights the potential for improved communication between language testers and registration bodies. Such collaboration could lead to more informed decision-making and the development of assessment practices that integrate both expert language testing knowledge and domain-specific requirements, ultimately benefiting all stakeholders involved.

Katherine Halley
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An investigation of the language assessment interests and needs of professional registration bodies in the UK: An unconsidered perspective?

Abstract

This project explored the interests and needs relating to language assessment of a group of (potential) test score users.

Through in-depth interviews, the researchers engaged with representatives of bodies for professional registration in the UK to investigate how they understood and, in many cases, applied English language proficiency requirements, tests and test scores. The aim was to provide a better understanding of these test users' interests and concerns, consequently allowing language testing professionals to consider how they might communicate more effectively with staff members at registration bodies about their use (or not) of tests of English as a second/foreign language in pathways to professional registration and offer support in decision-making on this topic.

Some of the registration bodies, particularly in the healthcare sector, used commercial English language tests as part of their registration processes. Other bodies did not usually use language tests to provide evidence of satisfactory English language and communication skills but, instead, relied on applicant performance in tests of professional knowledge and skills or in interviews and written application forms submitted as part of the registration process. Registration body representatives all acknowledged the importance of satisfactory language and communication skills for registrants in the professions they oversaw. Having them was viewed as part of a professional responsibility to be an effective and safe practitioner.

Overall, the registration bodies were confident in the approach they took to confirm these skills, whether using commercial language tests or less overt methods. Commercial language tests were seen to deal efficiently with a complex decision on behalf of the registration bodies. Direct tests of language were generally required only for applicants whose education and professional training was completed outside the UK. Applicants trained in the UK were assumed to have the language and communication skills required to operate in an English-language workplace. Registration bodies tended to trust test providers to convince them of the quality of a test, and they paid more attention to practical aspects of this than to construct-related aspects.

Several interviewees were keen to establish a more transparent and robust procedure to follow to evaluate new language tests for use. They were conscious of the importance of this task, the resources required to do it well, and the need for an independent view of the suitability of a test for a specific workplace context. The provision of templates providing a framework to review a new test or evaluate current practice would therefore respond to needs expressed by interviewees in the study. Developing such a framework might be carried out as a collaboration between a registration body and language testing professionals.

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List of abbreviations

CEFR	Common European Framework of Reference for Languages
COVID-19	Coronavirus disease 2019
CPD	Continuing professional development
EALTA	European Association for Language Testing and Assessment
EDI	Equality, diversity and inclusion
EngC	Engineering Council
FTP	Fitness to practise
GMC	General Medical Council
GPhC	General Pharmaceutical Council
HCPC	Health and Care Professionals Council
ICAO	International Civil Aviation Organization
ICE	Institution of Civil Engineers
IELTS	International English Language Testing System
IET	Institution of Engineering and Technology
ILTA	International Language Testing Association
LAL	Language assessment literacy
NMC	Nursing and Midwifery Council
OET	Occupational English Test
SELT	Secure English language test
SQE	Solicitors Qualifying Examination
SRA	Solicitors Regulation Authority
TOEFL iBT	Test of English as a Foreign Language Internet-Based Test
UKALTA	UK Association for Language Testing and Assessment
UK ENIC	UK National Information Centre for the recognition and evaluation of international qualifications and skills
UK-SPEC	The UK Standard for Professional Engineering Competence and Commitment

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1. Introduction

This project explored the interests and needs relating to language assessment of a group of (potential) test score users. Through in-depth interviews, the researchers engaged with representatives of bodies for professional registration in the UK to investigate how they understood and, in many cases, applied English language proficiency requirements, tests and test scores.

For some professional roles, registration requirements include having sufficient English language proficiency, and this is often evidenced using commercial language tests. The provision of such evidence tends to be required when an applicant's educational or professional training background differs from the standard profile – that is, the profile that has more commonly been presented to the registration body – and when English (as the dominant language of the UK) is supposed not to be the applicant's first language. For other professional roles, language and communication skills may be assessed less formally or taken for granted in the registration process. The interviews in this study therefore documented a range of views held by those responsible for regulating access to the workplace and/or to professional status on the value of establishing and maintaining standards of language and communication skills in contemporary UK work environments.

The aim of the interviews was to give the researchers a better understanding of these test users' interests and concerns relating to language assessment. This insight would then allow the researchers (and others) to consider how language testing practitioners and researchers might communicate more effectively with staff members at registration bodies about the use (or not) of tests of English as a second/foreign language in pathways to professional registration and offer support in decision-making on this topic.

The act of interpreting interviewees' comments to prompt discussion of how to foster engagement and provide support requires an acknowledgement of the researchers' own standpoints. The two researchers hold academic posts at UK universities in the fields of second language education and applied linguistics, and we share a research interest in language assessment literacy (LAL), as the concept is generally named, which has been defined in broad terms as 'the skills, knowledge, methods, techniques and principles needed by various stakeholders in language assessment to design and carry out effective assessment tasks and to make informed decisions based on assessment data' (Vogt et al., 2024, p. 1). We are interested in how language assessment is perceived and how LAL might usefully be promoted among those who are involved in different ways in this social practice (e.g., test-takers/learners, teachers, test providers, test score users, and other stakeholders).

Little research published on this topic to date has involved professional registration bodies. In this study, we sought to achieve a stakeholder-focused view of promoting LAL, using a bottom-up approach to determine possible ways in which language testing professionals might work collaboratively with these test users by recognising and meeting their needs. We have also suggested that this process – understanding the needs of a group of test users and then considering how best to support them – might serve as a prototype for similar engagement of professional language testers with other groups of test stakeholders.

1.1 Report structure

The report has five main sections. It starts with an elaboration of the topic and its rationale (Section 2). A literature review (Section 3) then presents studies which have considered different aspects of the topic, namely, the use of IELTS as a language test in employment contexts, other language testing for professional contexts, and developments in the project of language assessment literacy for test stakeholders, and we outline how our study addresses gaps identified in this literature. Section 4 sets out the methodology used in the research. The main body of the report (Section 5) presents findings from the interviews with representatives of professional registration bodies. The report concludes with brief reflections on the current situation for registration bodies, considerations for language testing professionals, and recommendations for research and researchers (Section 6).

The report lists the registration bodies which participated in the study. We associate interviewees directly with their employing organisation when the information is descriptive and this connection helps the reader by providing more context. In other cases, we may not make a direct connection, perhaps referring to a sector (e.g., healthcare) or making no specific link. Information included in the report that is specific to a registration body is generally in the public domain and available on the organisation's website.

2. Background and scope

In this section, we consider the context and motivation for the study. Two starting points are set out: first, the use of language proficiency assessment for professional registration in the UK and, second, the assumptions around language assessment literacy for users of test scores. Then, the scope of the study is established.

2.1 Language proficiency and professional registration

Professional registration bodies in the UK (properly called statutory regulatory bodies or regulators) currently address in different ways the general expectation that their successful applicants have English language and communication skills sufficient for carrying out their professional role (an expectation that assumes English to be the main language in the work context). Some registration bodies address the expectation explicitly, through processes which require applicants to provide evidence of sufficient English language proficiency by achieving a specified score on a commercial language test. The expectation is also managed in ways that are less obvious. For example, some registration bodies assess applicants' language and communication skills indirectly, with the application process itself (as written communication and/or interview) becoming a *de facto* test of language proficiency. Sometimes, this approach to language assessment is recognised, despite being more informal. In other cases, those involved may be unaware that language assessment is inherent in the registration process, and this aspect of professional registration may go unquestioned.

The role of English language proficiency in the professional registration process appears to have grown more important in recent years. This may be due to a greater number of international applicants seeking work in the UK (see, e.g., Office for National Statistics, 2024) and to changes in regulations about the recognition of qualifications obtained outside the UK. It may be argued that, previously, most registrants for a profession had similar backgrounds, being drawn from a national pool with, as a rule, their education and training completed in the UK and with English as a first language. However, for a variety of economic, social and political reasons, the scope of the employment market

in the UK (and in many other similarly more economically developed countries) has become increasingly international over the past few decades, linking into intensifying flows of human capital around the world.

Professional registration policy and regulation has adapted to accommodate a greater heterogeneity of registrant backgrounds. As this study showed, registration bodies demonstrate a concern to meet two potentially diverging goals, which creates inevitable tension: the first goal is to allow the efficient and fair recruitment of suitable applicants into the workforce, and the second is to maintain professional standards in terms of quality of work and public safety. International agreements have been made, recognising, for example, the benefits of standardisation and mutual recognition of academic and professional qualifications, although this endeavour may be affected by changes in the political and economic scene at national and supranational levels. For instance, the UK's withdrawal from the European Union in early 2020 has had a substantial impact both on the movement of workers into the country and the likely countries of origin of these immigrants. Legislation to accompany this change continues to be implemented, and new trading and collaboration agreements with other countries are being established. This example illustrates that the broad employment landscape in the UK is not settled, affecting large-scale workforce planning policy, and in turn indicating the probable need for flexibility and responsiveness in professional regulation.

2.2 Test users and language assessment literacy

Many organisations use English language tests and their scores as one component of their core operation (e.g., to register healthcare practitioners trained in another language to practise in an English-dominant context, to employ call-centre staff in a non-English-dominant country who will engage with customers in English). These test users are outside the field of language testing, but they make decisions based on language test scores, perhaps setting high stakes for individual test-takers and affecting their life trajectories. A commonly-voiced concern among language test researchers and practitioners is that test users can appear to have only a limited awareness of how adequately the test being administered serves the purpose for which it is being used, whether it is a commercial language test or put together in-house. There is a sense in the field that test users may sometimes pay insufficient attention to the principles of language testing. A lack of testing expertise among test users is understandable, as they may view their involvement with language testing as peripheral to the main task of their organisation and engage with it only as required. Nevertheless, this potential knowledge deficit may lead to situations in which a test is misapplied, with test scores being used to make decisions barely connected to the test's intended purpose. The consequences here are clearly negative, and the outcome is not in the best interests of test-takers, test users or the field of language testing.

A possible remedy to this problem is to foster the language assessment literacy (LAL) of test users, a project that has been in progress for several years (see Section 3.3 of the literature review). To date, much of the theory building and empirical research around the concept of LAL has focused on language teachers (e.g., Berry et al., 2019). Teachers have a more evident need for knowledge and skills to meet the demands of their professional role, which are likely to include creating various kinds of assessments for different purposes, as well as marking assessments and preparing students to perform successfully in external examinations. In a state-of-the-art review on LAL research, Vogt et al. (2024) list stakeholder groups that have received greater attention, with in-service and pre-service teachers being the principal targets of research, followed by learners, language testers, university admissions officers and test developers.

Test users – for example, registration bodies – are not mentioned as a focus of existing research, supporting the question asked in the subtitle for this report: does this group remain 'an unconsidered perspective'? However, it will be difficult to argue for improving the LAL of test users (and yet more difficult to implement it) if language assessment is only of marginal concern to them.

Then again, it should also be recognised that a knowledge deficit view – an assumption that test users lack knowledge of language testing – is only partial and lacking in nuance. (The current study illustrates well that this view is not valid.) The term LAL itself remains contested, along with its definition. Consequently, as well as proposing a goal to help test users become more 'assessment-literate', there is a parallel goal to be put forward that language testing researchers and practitioners should seek to become more 'policy-literate' (Pill & Harding, 2013, p. 400) and to understand test users' concerns and their operational contexts better (Deygers & Malone, 2019). Taylor (2013) acknowledges the variety of stakeholders and of their differentiated needs relating to LAL, concluding that the development of LAL 'is likely to be most successful when it reflects a dynamic and iterative process informed by a collaborative ongoing dialogue taking place at the interface between language testing experts and non-specialist test stakeholders' (p. 411). This perspective seems to apply in the context of this study, where common ground has to be established and different (though possibly complementary) areas of expertise acknowledged.

2.3 The current study and its scope

The main motivation for this study was the wish of two researchers in language testing to gain a better understanding of the range of policies and practices of professional registration in the UK, a context in which English language tests are often employed and which has not previously been studied in detail. This wish stems from a shared interest in LAL and the role of language assessment in contemporary society, that is, how it operates and is understood. No particular event triggered the realisation of this project, but the opportunity to investigate a research gap in this area was attractive and seemed timely, given recent changes in the UK affecting migration and employment.

The study was exploratory, and the researchers sought to capture current views and procedures in a range of UK registration bodies, while trying to avoid any prescription or imposed agenda during data collection. As Taylor (2013) stated, 'Relatively little is understood still about how...LAL develops within individuals or across stakeholder groups who are not trained assessment professionals' (p. 407). A better understanding of this context allowed the researchers to consider implications for LAL, but the study did not overtly model or implement any LAL practices as data were being collected.

As noted above, there is a scarcity of published studies in the field of language assessment that engage with professional bodies. Nevertheless, interaction may well occur privately, with representatives of professional bodies seeking advice and guidance from test providers or individual experts in different ways. Another aim of this study was to discover more about this. Are professional registration bodies' interests and needs unconsidered from a language assessment perspective or is relevant work simply unpublicised?

In terms of its scope, the project focused on registration bodies in the UK. We set this constraint to make the study more feasible, anticipating that data provided by different interviewees would be more easily interpreted and compared if it fell within one overarching national legislative framework. Despite this precaution, the situation became complicated. We chose the largest registration bodies and so focused on those covering England, the UK nation with the largest population. Some bodies in the study covered all four nations of the UK while others only covered two or three.

Some bodies provided recognition in the UK and internationally; for these, we focused on their UK activity. (Examples of these cases are given in Section 5, Findings.)

The project covered professions with protected titles and professions in which registration is not mandatory. Protected titles are safeguarded by legislation and titleholders must register with the relevant professional organisation to practise. An applicant who does not successfully complete all the requirements of the registration process cannot practise the profession in the UK. In professions where registration is not mandatory, registered professionals are often perceived as having a status that is not given to those without registration. It should be noted that, for some professions, the requirement to register is different from country to country, so that a professional not required to register in the UK might be required to do so elsewhere.

A final aim for the study was to provide an account of an attempt by language testing researchers to respond to a call to be more 'policy responsible' (Elder, 2021, p. 4) through an endeavour to engage with one group of test users. The experience of carrying out the project prompted reflection on more and less effective ways of working with potential and current stakeholders. The model followed in this study might therefore also serve as a prototype for similar engagement with other test users by language testing researchers and practitioners.

3. Literature review

This section of the report comprises three main topics providing the relevant background for the study. The first (Section 3.1) describes a series of research reports on how language tests – the International English Language Testing System (IELTS) in particular – are used in employment contexts in different countries, including the UK. The second (Section 3.2) expands this to other publications relating to language assessment and professional registration. The third topic (Section 3.3) is a review of literature on language assessment literacy relating especially to test score users.

3.1 Use of IELTS in employment contexts

Several published *IELTS Research Reports* have focused on how IELTS is used by professional bodies in different English-dominant countries, therefore setting the scene for the current study. Research was carried out over several years by Merrifield, with initial studies of 'the use of IELTS by professional associations and registration entities' in Australia, New Zealand and the United States (Merrifield, 2008) and in Canada, the United Kingdom and Ireland (Merrifield, 2011) being followed up by a later study revisiting the same topic for the United Kingdom, Canada, Australia and New Zealand (Merrifield, 2016). These publications present snapshots of the English language tests recognised at the time by different registration bodies in the countries studied and of the cut scores set by these bodies. They also report on perceptions of the tests in use and their impact, obtained mainly through structured interviews with representatives of the registration bodies. Merrifield (2016) noted the increased relevance in recent years of the phenomena of internationalisation of employment and the consequent movement of human capital, and how national infrastructures and procedures to regulate this migration also changed, including in their use of language tests and test scores. She also pointed out that many of the bodies willing to participate in the research studies were engaged in the registration of healthcare practitioners, 'a professional area where language competency represents high stakes because of [the regulatory bodies'] responsibility to protect the public' (p. 8).

Two further *IELTS Research Reports* have investigated the registration pathways of healthcare professionals. Gribble et al. (2013) considered how linguistic and other demands made on overseas-trained professionals and international graduates in Australia affected the supply of skilled labour in the fields of medicine and nursing (along with early childhood education). A range of stakeholders was interviewed: representatives of professional bodies, employers, managers, educators, overseas-trained graduates and international graduates in Australia. The researchers found that sufficient English language proficiency was essential in the fields of employment studied. However, the language requirement was only one element of the complex of skills needed for successful integration, with professional and cultural orientation and ongoing support also being critical. Another study, carried out in the UK by Sedgwick et al. (2016), considered the English language and communication needs of international nurses (i.e., nurses trained outside the UK), as reported by a sample of these nurses in interviews and focus groups, and the extent to which these needs were covered in IELTS content and tasks.

Other professions have been considered in the *IELTS Research Reports* series. For example, a study by Murray et al. (2014) investigated school principals' perceptions of the use of IELTS for overseas trained teachers in Australia and New Zealand, finding that this group of test stakeholders had less knowledge of IELTS than the researchers anticipated and sometimes set unrealistic standards for teachers' English language proficiency. Knoch et al. (2016) included the views of professional registration bodies for accountants and engineers in Australia as one of the stakeholder perspectives in a study on the use of IELTS as a possible university exit test, for graduates to demonstrate workplace readiness (in terms of English language proficiency) as they transitioned from university studies to employment.

The series of *IELTS Research Reports* understandably positions IELTS as the focus of investigation. The Merrifield (2008, 2011, 2016) reports serve as market reviews, setting out how the test is used by professional bodies in different countries. This is certainly useful information, although it loses currency quickly, as national policy changes, for example, and the contextual detail is often challenging to capture and represent. These studies exemplify how situations change over time, as do the views of stakeholders. Other studies investigate the relevance of IELTS to particular working contexts from the perspectives of different stakeholders, for example, (potential) employers and managers – school principals' views on the language skills needed by teachers (Murray et al., 2014) – and test-takers themselves – nurses' views on the language demands of their work (Sedgwick et al., 2016). They therefore engage with issues of validity: to what extent can IELTS, originally specified as a test of academic English for students with other first languages who seek to enter university in English-dominant contexts, serve as an effective and meaningful measure in other contexts, such as 'employment, migration and professional registration' (Gribble et al., 2016, p. 1) or transition into work (Knoch et al., 2016).

The higher number of studies on healthcare practitioners is perhaps due to, first, a perception that the possible consequences of poor language and communication skills are more severe in this professional context and, second, a consequent focus on this issue in the print and broadcast media over the past two decades. There has also been growing competition for this test-taker market from the Occupational English Test (OET), a specific-purpose test of English for the healthcare sector (see below), which may also prompt research interest.

The studies use qualitative methods to investigate the views of test stakeholders, and their findings generally report on perceptions of the test's usefulness for the context. In most cases, IELTS is already being administered for the purpose being investigated, so the research serves to provide a degree of retrospective validation of this use.

Viewed as a set, certain assumptions can be observed in these studies: It is generally taken for granted that a language test is required in the context (often because one – usually IELTS – is already being administered) and that stakeholders accept this view. The usual focus of the studies is investigating how IELTS relates to, or is used in, the context and how well this works. Only rarely do the studies start from a broader viewpoint or challenge these assumptions, for example, by asking stakeholders to consider whether testing is needed or whether alternatives might be employed. Studies have not generally engaged with registration bodies that do not use IELTS (or another test). Similarly, they have not asked stakeholders to explain their motivation for using a language test (or not), or, more broadly, about views on language assessment in their professional context. While we acknowledge that the research studies presented in this section of the literature review have different goals, and it is not our intention to criticise them, we nevertheless note this gap in coverage because it can start to be considered by new research, including this study.

Like the other studies in this section, our study was funded to produce an *IELTS Research Report*, and it provides a snapshot of the current UK situation. It is also qualitative in its methods (using interviews and thematic analysis). This study is exploratory, and we asked questions that were somewhat different from those in earlier studies, so that we could build on previous reports and foreground aspects of the data we collected that were not considered to the same extent previously.

3.2 Language testing for professional contexts

This section presents further stakeholder-related research published in venues other than the *IELTS Research Reports* series. The focus of this study on professional registration bodies in the UK means that some research on language testing for the workplace is excluded here, because professional registration is not relevant in all contexts. This relates to published studies of the language demands in the work of call centre employees, for example. We also exclude the field of aviation, as it is regulated internationally, and so research on the complicated topic of aviation English and its assessment is not considered here.

It was observed above that the language proficiency of healthcare practitioners is often a main topic of research, and this holds true beyond the *IELTS Research Reports*. Healthcare, and medical practice in particular, has a decades-long history of regulation in the UK, including the English language proficiency required of practitioners trained outside the country, and assessment-related research has been done in this area. As noted above, this focus (of policy and of research) is most likely due to the level of risk. Similar to passenger safety in the aviation sector, patient safety is paramount, and there are unfortunately several widely reported instances of the serious consequences for individuals of poor professional practice. The development of language assessment policies for healthcare professionals was exemplified in Taylor and Pill (2014), which presented a brief history and summary of English language assessment practices for medical doctors registering in three English-dominant countries: the UK, the United States and Australia. A subsequent publication (Taylor & Pill, 2024) updated this overview and drew attention to how practices had changed in the same three contexts over ten years, illustrating the evolving and fluid nature of regulatory environments.

The OET, a specific-purpose language test developed for healthcare practitioners, has been the subject of a substantial research effort since it was developed by Tim McNamara in Australia in the late 1980s. Macqueen et al. (2013) interviewed different groups of stakeholders, including doctors and nurses who had taken the test, clinical supervisors in the workplace, and representatives of registration bodies, eliciting perspectives on the test-taking experience and the OET's relevance to the clinical settings it claims to represent. Macqueen et al. (2016) then reflected on these stakeholder perceptions, presenting the test as boundary object (Star & Griesemer, 1989), 'develop[ed] in order to maintain coherence between intersecting social worlds' (Macqueen et al., 2016, p. 272). This metaphor is useful in any discussion of stakeholder perspectives, as it indicates how the same object can be understood in various connected ways when different stakeholder perspectives are involved. Practitioners in specific-purpose language testing (test developers, researchers, etc.) will have their view of the purpose and scope of a test, while those who work in the target language use domain for which the test functions as an entry requirement (gatekeeping) – the inhabitants of the domain – are likely to have a different view. What is noticed and what is taken for granted, what matters and what is discounted, both about the test and its context and about the ways of being and doing in the domain, will be different from these two perspectives. In the OET study, the researchers note 'a degree of incommensurability between the applied linguistics and health professional notions of communication' (p. 284). While not a novel observation, this helped the researchers in the current study prepare to deal with the different starting points and expectations of language testing of our participants, namely, representatives of registration bodies. The observation also has important implications for understanding language assessment literacy across different stakeholder groups.

A subsequent publication (Macqueen et al., 2021) revisited data from interviews with representatives of two healthcare registration bodies in Macqueen et al.'s (2013) study and data from interviews with representatives of registration bodies for accounting and engineering in the IELTS study cited in Section 3.1 (Knoch et al., 2016). The researchers drew out 'policy narratives', which included 'the need to manage large numbers of applicants, to assure a level of English proficiency for high-risk professional communications, to provide an objective assessment that is separate from any assessment of professional competence and to maintain consistency of standards with other bodies' (Macqueen et al., 2021, p. 49). This study is perhaps most like the current study, in which we also sought to interpret such narratives for registration bodies in the UK and then to expand this view by engaging in a similar way with bodies that do not directly use English language testing in their current registration pathways.

As an implication the researchers drew from their interpretation of test users' views, Macqueen et al. (2021) concluded that:

These kinds of explorations can lay foundations for more effective communications between language testing specialists and score users about the importance of ensuring that test uses are congruent with test constructs. A greater understanding of the kinds of complexities involved in determining policy settings will go some way to facilitating 'policy responsible' conversations and interventions. (p. 65)

They take the term 'policy responsible' from Elder (2021, p. 23); the two articles are part of a special issue of *Papers in Language Testing and Assessment* on "Negotiating tensions between language assessment policies and practices: the role of the language testing professional". Elder notes the generally limited focus of discussion of test impact on 'how stakeholders, such as teachers and learners or institutional administrators, are affected by a test in use rather than on the broader policy implications of testing activity' (p. 23). This describes, to some extent, the reports in Section 3.1 of this literature review.

However, Elder's challenge was that, as policy responsible professionals, language testing practitioners and researchers should 'assist decision-makers in navigating the complex challenges they face in bringing about change, while also highlighting the limits of our power' (p. 23). This opinion can be viewed as creating a link between being policy responsible and promoting language assessment literacy, the topic of the final section of this literature review.

3.3 Language assessment literacy and test stakeholders

In an article entitled *So, why do we need relationships with stakeholders in language testing? A view from the UK*, Rea-Dickins (1997) sought to define the stakeholders that practitioners and researched should consult. She also posited that: 'We need to ask to what extent stakeholder involvement is actually meaningful, whether meaningful participation is achieved, what the real relationships between the stakeholder groups consulted are, and whether there is a danger of paying lip service to the whole undertaking' (pp. 304–305). These cautions remain valid and, although the need to engage with stakeholders has become well recognised, its practice may often be characterised as partial, clumsy and ineffective.

The concept of language assessment literacy (LAL) was briefly introduced above (in Sections 1 and 2). The range of stakeholders in language testing is broad, due to the application of tests and assessments in many settings in contemporary society. Taylor (2009) sets out a definition of LAL, its scope and possible stakeholders, while Taylor (2013) offers the reminder that 'language testers and test developers need to be sensitive to many different types of test stakeholder and the varying ways in which they find themselves engaging with and understanding assessment issues' (p. 407).

Under this topic heading, we introduce the few studies that have foregrounded LAL in stakeholders beyond language teachers, learners, and language testing practitioners and researchers. These studies are relevant because they illustrate the range of levels of understanding among stakeholders and highlight how different perspectives might affect the relationship between language testing practitioners and various groups of non-practitioners who use language tests and scores to make decisions.

The first study (Pill & Harding, 2013) drew its data from an inquiry by a committee of the Australian Parliament into registration processes and support for overseas-trained doctors (the term used by committee). The inquiry was initiated after complaints that the system in place – following a move from state to federal regulation of this area – was overly complicated and possibly unfair. Demonstrating English language proficiency was part of the registration process, and issues about IELTS and the OET, as well as broader issues about testing language and communication skills, were raised in written submissions to the inquiry from individuals and organisations and in a series of public hearings held around Australia. The data studied were the transcripts of a series of these hearings. Representatives of regulatory bodies – non-practitioners of language testing – appeared at the hearings and their input is part of the dataset. The researchers' analysis offered three main categories of lack of knowledge and misconception in the data: 1) 'misconceptions about testing instruments and responsibilities'; 2) 'misconceptions about testing and testing procedures'; and 3) 'issues of expertise' (Pill & Harding, 2013, p. 389). These findings were not intended as criticism of the quality of the content of the hearings but as evidence of the gaps in lay understanding of language assessment. The need for parallel development of literacy in language assessment by practitioners outside the field and of literacy in policy by practitioners within language testing has been set out in Section 2.

The researchers note how 'the line between stakeholder involvement and the need for test practitioner expertise needs to be carefully articulated and explained to promote ongoing improvement in the general understanding of this issue' (Pill & Harding, 2013, p. 400).

Other studies have brought up the need for greater LAL and greater understanding of policy in the context of university admissions. Initial studies surveyed and interviewed those responsible for setting English language proficiency standards and selecting tests in Aotearoa New Zealand (Smith & Haslett, 2007), the UK (Hyatt & Brooks, 2009), and Australia (O'Loughlin, 2013). The first two studies are *IELTS Research Reports*, and the third has an explicit focus on LAL needs of test score users in this context. In a recent study, Cushing et al. (2024) surveyed admissions officers and faculty members at universities in the United States who were involved in admissions decisions for postgraduate study and in English language support about their perceptions of using TOEFL iBT in this work. Their report made explicit connections to other research publications on LAL and on policy literacy (see Section 2).

Baker (2016) reported on workshops held with admissions officers at Canadian universities in which they carried out language testing activities related to their professional role (e.g., examining test tasks and sample scripts, reviewing cut scores). In check-back sessions on these activities, participants reflected on what they had learned that was useful for their workplace performance. These reflections were recorded and, along with questionnaire responses, they provided data that can be claimed to represent an operationalisation of the construct of LAL for these stakeholders. Baker's analysis was based on a 'typology of workplace knowledge' (p. 67) developed by Michael Eraut and colleagues, researchers in the field of professional learning. Findings indicated the importance of procedural knowledge from within the workplace, as well as propositional knowledge, for these score users. Baker argued that LAL in this context should be viewed as 'competence in the professional practice of using language test scores effectively in admissions decision-making' (p. 78). She concluded that full understanding of this kind of professional practice must come from the stakeholders themselves and cannot be defined or imposed by the research community. This promotes the value of collaboration in defining LAL to include specific professional competence required in a field of work.

Deygers and Malone (2019) took a more explicitly critical perspective on LAL in university admissions, with the subtitle of their article, *the dialogue that isn't*, referring to the apparent lack of engagement between language assessment experts on one hand and university policy-makers on the other. In the context of Dutch language tests used in university admissions for international students in Flanders, Belgium, interviews were carried out with high-level policy-makers at universities and in government (rather than the policy administrators and admissions officers principally involved in the other studies presented above). The analysis sought evidence of the real-world influences on policy formation and development. Policy was found to be an 'acceptable compromise' (p. 362), determined by a range of political, practical and other factors that were more influential than empirical evidence available from language testing researchers. Understanding how policy is made may help the language assessment community to recognise the goals and constraints in the stakeholders' operational context and also, therefore, to interact more productively with them. Interestingly, Deygers and Malone noted how the act of interviewing policy-makers prompted subsequent signs of change in related policy and practice of their respective institutions. There was evidence of such potential impact in the current study, too.

To conclude this section of the literature review, which has presented research on LAL and made links to policy literacy, we expand its scope to consider literature relating to the effective communication to the general public of research in the field of language assessment. The skills needed to engage with non-specialists are likely to be of use with stakeholders as well. Taylor (2023) argued that the development of LAL strategies to reach a broader audience, including but also going beyond identifiable stakeholders, is an important goal for the language assessment community. Taylor gives an example from the COVID-19 pandemic in the UK, when taken-for-granted norms of test delivery and score interpretation were disrupted, with school-leaving examinations cancelled and alternative assessment methods put forward. This caused substantial public disquiet, resulting in educational assessment practices unexpectedly becoming headline news. Although the engagement of experts in language testing in this discussion was apparently limited, the ethical codes for our profession require commitment to this type of work. We note in this annotation from the International Language Testing Association (ILTA) Code of Ethics, for example, that, 'Language testers shall be prepared to interpret and disseminate relevant scientific information and established professional opinions to society' (ILTA, 2018, Principle 7). Similarly, one of three roles of the UK Association for Language Testing and Assessment (UKALTA) is 'providing a highly visible source of professional expertise to which educational and corporate bodies, government and the media can look for input related to improving language assessment in the UK' (UKALTA, n.d.-b). Therefore, there is an accepted professional and ethical responsibility for language testing practitioners and researchers to promote greater understanding of their field, and recent research in LAL, presented above, indicates that this is achieved more easily through engagement with stakeholders (at all levels) that seeks mutual understanding.

To summarise, research to date shows that the field of language testing and assessment is recognising the need to communicate more effectively with those beyond its own community and to engage with a variety of stakeholders and a broader public. The current study takes one group of stakeholders – professional registration bodies – that has not received much direct consideration previously with the aim of understanding better what representatives of this group know, and perhaps want to know about language testing. With the creation of an opportunity to listen to the current interests and needs of this group of stakeholders, language assessment researchers and practitioners may gain a greater understanding of their work and their priorities, and of how more effective collaboration might be developed.

4. Methodology

In this section, we discuss how we carried out the study. The research questions are presented first. Subsequent information about our research methods is organised under a series of section headings.

This exploratory study took a qualitative approach (Benson, 2013; Denzin & Lincoln, 2017). In the research method, we drew on participants' lived experience of the topic in their professional roles. We sought to establish how language and communication skills are viewed by professional registration bodies and whether and how language tests are used in registration procedures. The project was guided by these research questions:

1. How are English language tests perceived and used by professional registration bodies in the UK?

2. (a) What knowledge of language assessment do UK professional registration bodies have?

(b) What knowledge or skills (if any) do they want?

4.1 Regulatory bodies

The first stage of the process was to create a list of relevant UK professional registration bodies. We used a government list (Department for Business and Trade, n.d.) of regulated professions and their regulators as a starting point to establish the number and range of these bodies. At the time the study was carried out, the list had several categories: Education, Healthcare, Legal, Professional and Business Services, Social Care, Transport, and Other Professions.

To identify regulatory bodies appropriate for our project, we considered several factors, including:

- number of registered professionals and applicants
- geographical coverage within the UK (four nations, Great Britain, England and Wales, etc.)
- impact and visibility of registered professionals in the UK workforce and society
- assumed status of applicant language and communication skills in any regulatory decision-making.

The decision was made based on information publicly available on the Internet (including the bodies' own websites) and the researchers' own sense of relevance. We selected bodies with a larger number of registered professionals and with a stronger public profile (e.g., through more frequent presence in the media), indicating a greater and more direct impact likely in contemporary UK life. The relative sizes of the UK nations meant that bodies whose representation included England were preferred, and bodies representing only one of the smaller UK nations were not considered.

Examples of bodies that we rejected from consideration include: the regulator for offshore divers (a limited number of professionals); the regulator for pharmacists in Northern Ireland (a single nation of the UK arguably less representative of the whole); and the regulator for radiation protection advisers (an area of regulation likely to be complex and less publicly visible, though clearly of equal underlying importance). Several listed professions were not considered because of an assumption (by the researchers) that their regulation would deal with specialised technical or legal matters and not issues of language and communication skills (e.g., approved driving instructor, registered gas engineer, security guard). There was also an assumption made that some listed professions were unlikely to be the reason for trained practitioners to move from non-English-dominant countries to the UK, or to be encouraged to do so through the skilled worker visa list of eligible occupations, and therefore that registration in these professions was similarly unlikely to involve a language proficiency requirement. However, we recognise that this likelihood is a matter of degree and our various assumptions should be empirically tested. We accept that our exclusions were a limitation of the study; they provide an opportunity for future research. We also excluded professions regulated by the Civil Aviation Authority in the UK, because the regulation of at least some aviation professions (e.g., air traffic controller, commercial pilot) uses standards established internationally by the International Civil Aviation Organization (ICAO), an agency of the United Nations.

In addition to professions with statutory regulation in the UK, we wanted to involve professions with voluntary regulation. We focused on engineering, which is a large and visible group of professionals, so meeting our selection criteria. There are many other self-regulated professions which are not part of this study, including those accredited by the Professional Standards Authority.

We reviewed the public websites of the bodies on our initial list. Although content was not used directly in our analysis, which considered the interview data with representatives of the regulatory bodies, the review helped us determine the remit of the bodies, their geographical coverage and legal jurisdiction, and if they had a role in registration or accreditation for non-UK professionals. This information helped the researchers prepare the interview guide for the interviews (see below), and to note questions for particular representatives, checking on details relating to their organisation, for example. We also searched for information about English language proficiency and any relevant policy documents or research reports on the websites. Finally, we noted the channels available to initiate contact with the regulatory bodies so that we could set up interviews with their most suitable representative(s).

Reviewing the website content further also allowed us to confirm a distinction that we had been aware of from the start of the project, namely, that some bodies regulate entry to the profession directly and registration is required for practice in the UK, while other bodies provide professional accreditation but do not regulate entry to the profession, that is, UK employment is permitted although a protected professional title cannot be used (see Section 2). We also noted that regulators had responsibilities in terms of maintaining the register, dealing with complaints, managing fitness-to-practise procedures, and regulating professional training programs (e.g., university courses). In some cases, the organisation had additional roles including advocating for the profession in the public sphere, delivering professional development and training for registered practitioners, and providing information about opportunities in the profession for students and others. In other cases, this work was done independently by other bodies.

In parallel to this initial scoping work, an application was submitted to the research ethics committee for the Faculty of Arts and Social Sciences and Management School at Lancaster University. Ethical approval for the study was given on 14 June 2023.

Having obtained ethical approval, we started trying to contact the regulatory bodies using the public channels available. This generally involved sending a request through an online form or by email to an address for general enquiries. Our request explained the planned research project, its goals and the contribution from the organisation that would be required (i.e., preparation for, and participation in, an interview by one or more selected staff members). The template for the written request is in Appendix A.

The process of contacting the regulatory bodies proved to be more challenging and time-consuming than expected. For example, to streamline access, some websites were set up to allow for interaction with either applicants or complainants. However, as we did not belong to either category, our enquiries did not meet with a response. We sent the requests again and telephoned to follow them up. In other cases, contact centre staff tried to respond to our requests but were unsure which staff member in their organisation would be able to answer our questions. This process extended over several months.

In most cases, our requests eventually reached a member of staff who was able to respond. A small number of the organisations on our initial target list declined to take part in the interviews. A further small number did not respond to our requests to participate or to follow-up communications, and we did not pursue them. One regulator we approached provided an application form to be completed by external individuals or bodies asking for research involvement. Our application was approved, and we proceeded with the interview.

A further opportunity to promote the project arose during the data collection period. One of the researchers was invited to attend a meeting of the Professional Associations English Language Forum run by the British Council to inform and engage with regulatory bodies in the UK using IELTS. (The British Council is a co-owner of IELTS and promotes use of the test in the UK.) A short presentation on this research project was made and subsequent communication between the researchers and attendees led to interviews being arranged.

The names and jurisdictions of the professional regulation bodies that participated in the study are in Table 1.

Table 1: Professional regulation bodies participating in the study

Name	Jurisdiction
General Medical Council (GMC)	United Kingdom
Nursing and Midwifery Council (NMC)	United Kingdom
Health and Care Professionals Council (HCPC)	United Kingdom
General Pharmaceutical Council (GPhC)	Great Britain
Engineering Council (EngC)	United Kingdom and international
Institution of Civil Engineers (ICE)	United Kingdom and international
Institution of Engineering and Technology (IET)	United Kingdom and international
Solicitors Regulation Authority (SRA)	England and Wales

Some regulatory bodies were cautious about participating in the research study, expressing concern about how the organisation might be represented. They were sensitive to possible criticism of their current approach to setting and maintaining English language proficiency standards for applicants, and how this might affect their standing with applicants, registered practitioners, other registration bodies, and the general public. There was also caution relating to possible unfavourable representations of the registration body in the media. These issues were addressed in the participant information we provided and in email exchanges with the staff member dealing with our request. We reassured the organisations that the study was not intended as a check on the quality of their work and that the research had no hidden agenda.

4.2 Participants

In information provided to the registration bodies about the study, the researchers suggested the interview participant be a staff member who was involved in making decisions about the body's use (or not) of English language tests and, if relevant, the application of test results to registration outcomes. We accepted the interview participants put forward by the regulatory bodies but do not know how they were selected or who may have been involved in this.

The job titles for those interviewed across the regulatory bodies that participated in the study included: head of policy, policy manager, policy lead, assistant director of policy; head of policy and standards, standards and quality manager; head of registration applications, registration and international policy manager; head of qualifications, director of education and training, and head of education. We mainly interviewed one representative from each regulator but, on occasion, more than one member of staff was put forward.

The scope of the research, as presented in the interview questions provided in advance (Appendix B), included policy and practical aspects, and responsibility for these areas might fall to different staff members, particularly in larger organisations. For example, a complementary pair was made up of an education/training role and a registration role. One interview involved three interviewees from the same regulator concurrently; for another organisation, two interviews were scheduled separately with interviewees in different roles. In this way, the full scope of the interview questions could be covered.

Each interviewee was provided with a participant information sheet and a consent form. The signed consent form was kept securely by the researchers. The information sheet included information about the purpose of the study, the commitment involved for the interviewee, and information about withdrawal from the study, anonymisation and secure storage of the data collected, and the use of data for research purposes only. Interviewees were told their names would not be used in any report on the data, and reference to interviewees would not be sufficient to identify any individual. However, it was also noted the registration bodies involved in the study would be listed (Table 1), and it might therefore be possible to link information published from the interviews to a particular organisation and then to infer who might have provided it, as the topic is specialised and some information might be known by relatively few employees in an organisation.

Some participants noted during their interviews that a view they were sharing was their own rather than the position of their employer (the regulatory body). While this was exceptional and seemed to require flagging up by the interviewee, we must recognise that the findings presented in this study do not represent a completely clear and comprehensive official perspective.

Personal information about each participant was not collected systematically, but information pertinent to the study was provided during the interviews. Several participants described a long involvement as an employee of the professional body and as a member of the profession. In contrast, other interviewees mentioned working for another regulatory body previously or in the near future (mainly in the field of healthcare) and described a more general turnover of staff moving between roles and registration bodies.

4.3 Instruments

Along with the participant information and consent form, each interviewee was sent an overview of the interview format in advance of the interview (Appendix B). The document presented a series of guiding questions to allow the interviewee to understand the scope of the interview and to prepare if they wanted to do so. In one case, an interviewee provided written responses to these questions by email after the interview was completed. (These questions were also provided when the interview was being set up, so that the contact at the regulatory body could decide which member(s) of staff would be most suitable to be interviewed.)

In the interview, the researchers used a more detailed set of questions (Appendix C). The substantive interview questions were organised into four main sections framed by an introduction and round-up:

- introduction (study objectives, independent standpoint of researchers)
- regulatory body's role
- English language assessment practice
- quality assurance
- stakeholder perspectives (referring to regulator's stakeholders, including applicants and their subsequent employers)
- round-up (questions from interviewee, next steps for project).

The use of the interview guide in semi-structured interviews provided a consistent approach to data collection across the interviews while allowing follow-up on points of interest in individual interviews. Not all questions applied equally to the bodies interviewed. For example, the Engineering Council serves as an umbrella registration body for engineers and maintains the professional registers, while granting licences for the assessment of candidates for registration to professional engineering institutions, which assess applicants in different fields of engineering. The Institution of Civil Engineers and the Institution of Engineering and Technology, represented in this study, are examples of such institutions. In basic terms, questions about policy were likely more pertinent for the Engineering Council representative while questions about registration practices were more pertinent for the representatives of the institutions.

It was not possible to pilot the interview questions in advance of the interviews. Following the first interview, the researchers reviewed the questions, and minor amendments were made to wording to improve clarity.

4.4 Data collection

In-person and online interviews were offered to participants, and all chose to be interviewed online. For this reason, the interviews could be conducted jointly by the two researchers, who followed the interview guide and took turns to ask a section of questions each (see Appendix C). This ensured consistency of delivery overall, although follow-up questions from either interviewer were a feature of the interactions.

We conducted nine interviews in total, between October 2023 and May 2024. As noted in Section 4.2, one interview involved three interviewees. The interviews were scheduled at the convenience of the interviewees. They lasted for one hour, and we were careful not to go over the agreed time. We used video-conferencing software (Microsoft Teams) to hold the interviews, and attendees at each interview were able to see each other. All but one of the interviews were video-recorded, with participant consent. The researchers took handwritten notes of participants' responses as back-up.

We followed procedures for secure data handling required by the ethical approval, and we stored recordings and other interview-related documents digitally in a secure shared folder online, managed by Lancaster University.

Following each interview, the video-recording and the automatic transcript created through the Teams software were downloaded and saved, and then deleted from the software tools. The automatic transcript was carefully checked with the recording and corrected as necessary by one researcher. The transcript was anonymised, with the interviewee name(s) being removed manually and replaced with a code identifying the regulatory body only. The orthographic transcription captured the spoken content of the interaction but did not indicate other features of speech (e.g., laughter, overlapping turns), which were not relevant to a thematic content analysis. Once the transcripts were checked and anonymised, downloaded recordings and draft documents were deleted.

4.5 Data analysis

The anonymised transcripts were shared by the researchers as the data for their qualitative analysis. For one interview that was not recorded, the researchers' notes were used instead. An inductive approach to data analysis was adopted which reflected the exploratory nature of the project. The two researchers coded the data individually at first and then the codes, as well as the sections of data coded with them, were compared and agreed upon in an iterative process. This consensus-based approach to coding was found to be appropriate for this study.

The guidelines we followed in the data analysis process were drawn from Braun and Clarke (2022). Thematic analysis was used, as it is appropriate for exploratory research seeking to draw out participants' views from interview data describing their work and lived experience of the context as prompted by a set of common questions. Phases of analysis proposed by Braun and Clarke (2022, pp. 35–36) are:

1. familiarising yourself with the dataset
2. coding
3. generating initial themes
4. developing and reviewing themes
5. redefining, defining and naming themes
6. writing up.

As Braun and Clarke (2022) note, 'the different phases of reflexive TA [thematic analysis] are not always sharply delineated' (p. 34), and the analysis process is often iterative, rather than linear, and certainly involves discussion and reflection. The researchers met several times to discuss the data and their developing views on it during the analysis period. This activity also provided confirmation that ideas being developed were reasonable and pertinent to our research goals. We also wrote a conference presentation on the data during this time, which helped us express some of our insights more definitively.

To reiterate, the goal of the research was to 'surface' the interests and concerns of representatives of professional registration bodies relating to language assessment. Analysis of the interview data was anticipated to provide a better understanding of how language tests were used and perceived by professional registration bodies in the UK and give further insight into views on how language and communication skills were valued for professionals in their workplaces in the UK. Findings might also indicate areas where confusion exists about the purpose and use of language tests.

The transcripts included information that was not relevant to the goal of the research. For instance, although it was important to elicit details about each regulatory body's role and to ask about aspects specific to a particular organisation so that the researchers could understand the operational context as fully as possible, some details were not of direct relevance to the study (e.g., exact numbers of registrations each year, post-Brexit legal arrangements being agreed with individual European countries). Obligatory annual reporting by the regulatory bodies generally provides this information, and in several cases, interviewees referred us to documents and other specific content on the organisation's website. Nevertheless, all data were read multiple times by the researchers and coding was applied throughout the transcripts.

4.6 Member checking

This final step in the research method was not part of the original proposal for the study. It was advised by one of the anonymous reviewers of the research report when it was submitted and subsequently carried out with the agreement of the funder. The reviewer recommended that the representatives of the registration bodies who participated in the study be given sight of the proposed publication version of the report and invited to comment. Carrying out such member checking or participant validation is generally viewed as good practice in qualitative research and is a common feature of studies in which the analysis seeks to offer an account of participants' perspectives (Braun & Clarke, 2022).

The intention is to pursue further a positive and open relationship between researchers and participants. A participatory model was not part of the original proposal, and the study was not conceived as community-engaged research (Key et al., 2019), but the research design and goals inhere a reciprocity that should be recognised. It is important to be transparent and allow participants to feel comfortable with the published representation of the views expressed in their interviews, as the researchers may have unintentionally misreported interviewees' comments or framed them poorly or negatively. This step, therefore, is intended to promote further engagement and collaborative research in this context, as well as to encourage the registration bodies themselves to endorse and own the research findings. This practice also provides a model for future research in community-based participatory research.

Interviewees were sent the report and given two weeks to provide any comments. Three responses were received, with the general message that the report's content was appreciated. One interviewee indicated that no changes were required, the other two each indicated a small number of proposed alterations. These were considered by the researchers, and minor changes were made to the report. Amendments mainly related to inaccuracy in the description of a registration body, clarification of terms used, and additions to provide further explanatory context for the reader.

5. Findings

In this section, we present views of the 11 interviewees in the study, who were employed by professional registration bodies in the UK. The aim of the study was to investigate the interests and needs relating to language assessment of these bodies. The data were collected over eight months and represent the situation from the perspective of the participants at the time of their interview. The data therefore do not necessarily characterise fully or exactly the official positions of the regulatory bodies involved in the study.

The findings are set out here under a series of headings which draw together the themes observed in the data and present them in a sequence intended to create a narrative that is clear to follow. First, information taken from the interviews is used to provide some context about UK registration bodies (Section 5.1) and to illustrate the work they do (Section 5.2), including how demonstrating language proficiency is relevant to this, particularly for applicants from outside the UK (Section 5.3). Then, we consider two main approaches to this task: using commercial language tests (Section 5.4) and alternatives to overt language testing (Section 5.5). Factors affecting registration bodies' use (or not) of language tests are set out (Section 5.6), and bodies' interaction with their broader environment is explored (Section 5.7). We present views on how English language requirements relate to other issues around professional registration (Section 5.8) and on current topics of interest to regulation bodies (Section 5.9). We conclude by summarising instances of possible LAL development noted during the interviews (Section 5.10). We preface many of these thematic sections with an illustrative quotation from the data set; these are given in italic type below the section heading.

In the Findings, we sought to use the words of the interviewees, these being the most direct way to communicate their perspectives. Contextualising information is provided as needed, with the name of the registration body sometimes given, if useful (abbreviations used for each body are in Table 1). In other cases, we omitted the link between the interviewee and the employing organisation intentionally, to maintain the anonymity of the participant as set out in the approved ethics documentation for the study.

References from direct quotations in the report to the interview transcripts were not included for the same reason. In direct quotations, restarts, repetitions and fillers were removed to make the text easier to understand. Ellipsis (...) is used to indicate other omitted text. Square brackets show explanatory additions to what was said.

5.1 Situating UK registration bodies

An initial observation was the diverse nature of the registration bodies represented in the interviews. Interviewees all provided substantial information about their organisations and the various roles they played. The number of applicants and registrants these regulatory bodies dealt with varied considerably. For example, the Nursing and Midwifery Council (NMC) had a very large register of trained practitioners: 'there's a record of 52,158 new joiners last year, almost half of whom are internationally educated'. For several bodies, applicant numbers, particularly for international applicants, had increased in recent years: 'it's been a growing proportion over the last four or five years really...we are very reliant on the international people'. In the role of maintaining a register, a regulatory body was also generally responsible for revalidation and renewal of registration, and handling complaints and fitness to practise cases.

Statutory regulators may be responsible for one or two professions or many more. At the time of the interview, the Health and Care Professionals Council (HCPC) regulated 15 professions and dealt with 33 protected titles, while the Engineering Council (EngC), as the regulatory body for a voluntary self-regulated system, licensed 40 engineering institutions to assess individual practitioners for inclusion in its register according to the Council's 'benchmark' regulations, perhaps alongside regulations specific to an institution, and for three main professional categories (Engineering Technician, Incorporated Engineer and Chartered Engineer).

Other roles taken by the registration bodies varied greatly. In addition to setting standards for professional competence and ethics for registration to practise using a protected title, a body might represent the profession (its 'public voice') and carry out advocacy for its members, and it might promote the profession in schools to young people, run conferences and continuing professional development for members, and support student members and fellows ('leaders'). Some professional bodies had very long histories – the Institution of Civil Engineers (ICE) was formed in 1818 – while some professions were only recently regulated in the UK (e.g., nine categories of practitioner psychologist have been registered by the HCPC since 2009).

Interviewees explained the scope of their organisation and its jurisdiction (as set out in Table 1). For example, the Engineering Council (EngC) representative stated:

We are the UK regulator for the UK profession. The bodies that we license [the engineering institutions] are in some cases positioning themselves more as international bodies and they do have in some cases quite large international memberships, but for our purposes, the register is the UK register.

Interviewees also explained their role in the organisation. Several noted that they were not policy-makers and that the bodies had procedures for policy-making, with an executive board making policy decisions. It was also evident that interviewees had different amounts of experience in their role.

5.2 The work of professional registration

We'd talk ourselves about being an agile regulator

One interviewee set out the role of a registration body:

To create some system for recording who is able to practise a profession and use a title, the requirements that people must meet to join that register, and then the way in which what's known as fitness to practise is demonstrated or can be breached...One of our prime objectives is about public safety and confidence.

Later in their interview, they added the need to ensure 'that we are able to support the UK government's drive to meet the workforce challenges'. The statutory regulators noted their legal responsibilities for setting standards, for individual registration and as 'outcome standards' of training programs taken in the UK by students going on to obtain professional registration (e.g., university courses). Registration pathways were often different for those trained in the UK on an accredited course and those trained elsewhere, where the standard of training could not be scrutinised. As noted already, the number of internationally-trained applicants for registration had increased in recent years for some registration bodies. In addition to professional knowledge and skills, registration was often concerned with evidence demonstrating the good character of the applicant, perhaps involving police checks or self-declaration relating to ethics and conduct, and their English language proficiency (considered in detail under the next heading). Interviewees indicated that they knew which countries were the most common source countries for applicants and the likely profile of those applicants in terms of education and professional experience.

Interviewees noted that a flexibility of approach is often required, as the bodies were affected by government policy, world/national events and more general developments in technology, such as generative artificial intelligence, although such changes may ebb and flow. Registration bodies may be in transition themselves, implementing new policy and procedures. Change may affect any aspect of their work, including how they manage the demonstration of English language proficiency.

Registration bodies needed to understand the work of other regulators and collaborate with them to find solutions. This 'interplay between regulators' meant that, in a particular case, a healthcare registration body may be liaising with the Care Quality Commission (for care providers), the Professional Standards Authority (representing professions that are not statutorily regulated), the Health and Safety Executive, and the Environment Agency. A regulation body might also work with the independent body representing the professional interests of the group it registered, for example, the Solicitors Regulation Agency (SRA) with the Law Society, representing solicitors in England and Wales.

UK registration bodies, particularly bodies in the same sector (e.g., healthcare), maintained informal contact with each other on a range of issues with potential impact on the regulatory landscape. There were also connections with parallel national bodies in other countries and with international bodies. For example, in the General Medical Council (GMC) interview, the International Association of Medical Regulatory Authorities was mentioned.

Larger registration bodies may have a research team which could be asked to investigate a current topic of concern. Consultants may also be engaged for ongoing or specific work. Findings from research (internal or external) were presented to policy-makers, who were said to consider the effect of any change on the organisation holistically, and perhaps not accepting recommendations made.

In the interviews, participants promoted the validity of their work and the professional standards set. The registration bodies were involved in maintaining the currency and relevance of their standards, ensuring fairness of process, and promoting acceptance by their users and stakeholders. This was done through regular review and the monitoring of complaints and correspondence for indicators of a possible need to act.

The representatives were aware of tensions among the views of different stakeholders – for example, government, employers, individual applicants, and applicant advocates – and the effect this had on their work. The NMC representative expressed this in terms of the English language proficiency requirement and different pressures put on the regulator:

[Critics will argue that] you [registration body] need to make it fairer. You need to be more diverse. You're putting artificial blockers in the way of nurses getting on the register who are perfectly capable of speaking English, they just can't pass these tests...There's also pressure from government, or there has been, in terms of a pledge to get 50,000 new internationally trained nurses on board...There's also quite rightly pressure internally and externally about making sure we preserve patient safety and that our requirements are fair and proportionate, and it's quite a difficult balancing act.

5.3 The relevance of language proficiency

Interviewees were clear that English was the language required to practise in the UK and therefore evidence of English language proficiency was required of applicants.

You don't have to be a British national to be on our register, but it is the UK register and therefore as things currently stand, the view of our board is that ability to communicate in English remains an important part of [being registered]. (EngC)

We need to make sure that everybody on our register has the necessary knowledge of English to practise safely and effectively in the UK. So, it's not just a requirement for internationally trained graduates, but by its very nature, if you're trained in the UK [and so in English]...that training is sufficient for us to know that your language skills are effective. Where you've been trained internationally and especially where you've been trained in a country where English isn't the majority spoken language, then that becomes more of an issue, and that's where we need to see further evidence. (NMC)

However, there were differences in understanding among interviewees about whether this was written into relevant legislation. (Representatives also referred to the *Welsh Language Act 1993* and the provision to be assessed in Welsh; this aspect of UK registration was not part of the current study and was not considered further for this report.)

All interviewees recognised that language skills were necessary to communicate with patients, clients, co-workers and others in professional contexts. English language proficiency is written into professional codes referred to by interviewees. For example, Good Medical Practice (GMC, 2024) states: 'You must have the necessary knowledge of the English language to provide a good standard of practice and care in the UK' (p. 8). Similarly, The UK Standard for Professional Engineering Competence and Commitment (UK-SPEC) (Engineering Council, 2020) states the required competence for registrants to: 'communicate effectively with others, at all levels, in English' (p. 22).

Some interviewees indicated they were not clear how the explicit focus on English in current professional standards came about. One of the engineering representatives noted of the UK-SPEC competence relating to English that:

In the early stages [of development of the professional requirements], it would have just been assumed that it would be in English, and I imagine this [text] has eventually been explicitly put in because perhaps there were increasingly questions about lots of international registrants and does it need to be in English?

Considering that satisfactory English proficiency was universally valued as a professional requirement, it was noted that the engineering professions did not use language tests in their registration process (see further below). The ICE representative contrasted what was stated and what remained unstated:

It's an explicit part of the standard that engineers have to be able to communicate effectively both in writing and orally...So that's the explicit bit. The bit that's implicit is how do we determine that somebody is writing clearly in English, that they're speaking clearly in English, that is not defined. It is implicit and assumed.

The SRA did not use language tests directly either. However, applicants had to complete an intensive test of professional knowledge and skills that was delivered and answered in English (see further below). The interviewee recognised this as an indirect test of language proficiency, and defended the situation by drawing a parallel between the test and routine practice:

We are assessing people who want to become solicitors. Quite often they have to deal with complicated language and legal terms, so it is exactly getting that balance...What we're concerned about is the validity of the assessment and making sure we're assessing the right thing.

In the GMC interview, it was noted that research had shown that the score obtained in the English language proficiency test correlated positively with performance in the GMC knowledge and skill assessment for doctors.

5.4 Use of commercial language tests

We haven't...ever questioned the ability for IELTS to be an effective test and have taken a level of assurance from them.

To introduce this topic on the use of language tests and the following topic on alternatives to language tests, we present a description given by the NMC representative of the current ways for internationally-trained nurses seeking registration in the UK to demonstrate their English language proficiency. This illustrates some options in use and shows how test scores may be complemented by other evidence. To provide further context, the NMC deals separately with the provision of evidence of English language proficiency and the assessment of professional knowledge and skills (although the latter is done in English as well).

Most people will need to provide evidence of their English language competency, and they can do that in a variety of different ways. They can either give us a test if they've successfully got a test result, either IELTS or OET. They can provide evidence of being trained or practising in an English-speaking country. And they can also provide us with evidence of being taught and examined in English if [this was] not in a country where English is the majority spoken language. They can provide evidence from their employer that they have been practising safely in English, not practising as a nurse, but...working as a healthcare assistant or support work or something like that.

So, there is a route for people to provide employment evidence...[The employer] must be registered with the NMC within the UK.

As the excerpt indicates, several of the regulatory bodies, particularly those in the healthcare sector, used commercial language tests in their registration pathways. Interviewees from these bodies were able to state the tests that were recognised, the overall score that was required (the cut score), and the sub-scores for components of the test that also had minimum required scores. In their comments, interviewees indicated that IELTS in particular had become the established standard in this context. Cut scores were often set for other tests, recognised more recently, by checking their alignment with IELTS scores (e.g., via published concordance tables).

The GMC offered evidence of commissioned research that had been done both to establish defensible cut scores on IELTS for doctors (Berry et al., 2013) and to review other tests to add to IELTS as recognised tests (Taylor & Chan, 2015). In other interviews, such evidence was generally not provided, although it was indicated, for example, that executive board minutes would include information about how any policy decision had been reached.

Several interviewees explained that decisions about which tests to use and which cut scores to set were informed by decisions already made by other (comparable) registration bodies:

I think it was partly through the consultation and also speaking to other regulators, just to gauge what their requirements are...So, we were trying to balance the level of skill and the English language that you would need to use in the course of your working day...And then taking as a guide what the other regulators were using and speaking to the British Council [about IELTS] as well.

Regarding a consultation in progress at the time of the interview, one participant described the process for selecting possible tests as: 'What do other regulators do to satisfy themselves around English language proficiency?...We're looking to get alignment where possible.'

Interviewees who dealt directly with applicant registration indicated that using agreed test scores made their decisions about individuals' English language proficiency clear. Once the body was satisfied with the cut score decision, policy and procedures could be derived from it. A representative of a healthcare profession stated, 'we have to set a standard...I try not to be too flexible with it because obviously we need to maintain a standard and ensure, for patient and public safety, that people are of a demonstrable standard'.

Interviewees were aware that IELTS (the most used test) was a 'general' test, and those from healthcare bodies often compared it to the OET, a specific-purpose test for healthcare professionals. The OET was quite recently recognised or in the process of being recognised by several healthcare registration bodies, providing an illustration of how bodies followed the example of others in selecting tests to recognise. In some cases, a body had approached the OET provider for guidance; in others, it seemed that the OET provider had contacted the registration body.

The HCPC was holding a public consultation on English language proficiency at the time of our interview. Existing HCPC policy included allowing applicants to self-declare their proficiency or to provide evidence from another test provider 'that their test results and their testing process is equivalent to IELTS or TOEFL' (the two tests recognised by HCPC). Among other elements, the consultation sought views on the removal of self-declaration ('we are the last regulator of our standing that allows self-regulation') and on using instead an expanded list of recognised tests for registration purposes.

Overall, interviewees indicated that a choice of tests was welcomed by applicants. The introduction of new tests was often linked to changes made by other registration bodies, so prompted by a need to be seen to maintain similar standards.

It is hard to get really hard evidence that will convince everybody, and a lot of the evidence that we all use as regulators is we compare ourselves to each other... We're in the right sort of space if consistency is your standard. Of course we could all be consistently wrong, but the fitness to practise evidence doesn't bear that out...We are weighing a lot of different things in the balance really.

Another prompt for change in cut scores was noted to be 'correspondence' received from applicants, their advocates or employers, for example. Such feedback was seen as creating pressure for review and consultation.

Interviewees suggested that a level of agreement on appropriate cut scores had been obtained in most cases by adopting this consensus approach. Several noted that it might be difficult to find institutional documentation that justified the cut scores in use or described the official decision-making process. For example, the HCPC's English language proficiency cut scores on IELTS for speech and language therapists were higher than for other healthcare professionals they register, and an interviewee noted that 'no one quite understands why. We think that might have been something in the past that came from the Royal College of Speech and Language Therapists, but they themselves are not totally sure'. (The Royal College of Speech and Language Therapists is the professional body; score information is likely to have been shared when the HCPC became the regulator of the profession.)

Aside from the type of test (i.e., general or specific purpose) and its broad acceptance among registration bodies, the major concerns expressed by the interviewees affecting the possible recognition of a test were practical: cost, access to test centres worldwide and test security. The NMC interviewee said, 'A lot of organisations, employing [healthcare] trusts, prefer people to do an OET because it is health and social care based, but it is much more expensive than an IELTS test'. The interviewees were cautious about creating unintended barriers for potential applicants, for example, by recognising a test that was only available to test-takers in certain countries. Carrying out the necessary checks for a new test was found to be time-consuming and burdensome: for example, 'we don't have the expertise to look at particularly the security aspects of tests'.

For some representatives, the practical concerns took precedence over the content coverage of a test. Engagement with a test provider was more about 'working with them to support our process' – for example, online score verification – than about asking 'actually is [IELTS Band] 6.5 or 7 right for our profession based on your delivery of the test? We don't really unpick that with the provider'.

In summary, the registration bodies that used English language tests seemed to decide which tests and which cut scores to use by seeking comparability with parallel bodies in related fields. Practical matters were also important and might take priority over more theoretical aspects of language testing good practice (e.g., determining an appropriate construct to measure). Effort was also made to provide alternative ways for applicants to establish their language proficiency without taking a test, based on their educational background or professional experience.

5.5 Alternatives to overt language testing

We have that interview, so that interview is really, you know, the proof of the pudding.

For registration as a solicitor or as an engineer in the UK, taking a language test was not usually a requirement. The representatives of the SRA and the engineering institutions that we interviewed explained the registration processes they used. Although similar, they differed perhaps in the extent to which the application procedure was viewed as a *de facto* English language test.

In a relatively recent change in practice, to register with the SRA, every applicant – from the UK or elsewhere – took the Solicitors Qualifying Examination (SQE), which had two parts. The first assessed knowledge and understanding of the law using multiple-choice question format, and it was delivered via computer in English. The representative noted that, 'you need to have a really good understanding and be able to distinguish between the five potential answers that you're given'. The second part comprised 16 stations (12 written and 4 oral) in which the test-taker applied their professional knowledge to tasks in a range of scenarios. The written tasks may involve legal drafting or case matter analysis, for example, 'in the context of a property transaction or a business transaction, ...probate, conveyancing'. The oral tasks were 'assessing candidates' advocacy skills and ability to interview and interact with clients...they'll present in front of a solicitor who's playing the part of a judge...they'll be put in front of an actor who's playing the part of a client'. After the interviewing tasks, the test-taker wrote up an 'attendance note' summarising the meeting, and this was also for assessment. The assessment criteria referred to being able to communicate effectively, and assessors were focused on candidates' appropriate professional behaviour. Passing the second part of SQE provided satisfactory evidence of English language proficiency.

Applicants to the UK register with professional experience from certain non-UK jurisdictions where legal practice was sufficiently similar to UK practice were exempt from taking the second part of SQE. However, as this was also how evidence of English language proficiency was provided, these applicants needed an alternative assessment for this purpose. In December 2023, the SRA held a public consultation about how the (English or Welsh) language proficiency of qualified lawyers was to be assured. The proposed changes included lowering a previous requirement of demonstrating proficiency at C2 level on the Common European Framework of Reference for Languages (CEFR; Council of Europe, 2020) to a new requirement of a score on a test recognised as a Secure English Language Test (SELT) by the UK Government at (or equivalent to) at least an IELTS Band 7.5.

At the time of the interview, the consultation outcome was not published. Nevertheless, the situation illustrates how assessments of professional knowledge and skills are engaged to assess language skills as well, and how this practice may create the need for other, more direct language assessment when exemption from the professional assessments is then allowed. In this case, the registration body sought validation from external frameworks and tests, for example, the CEFR, IELTS and tests recognised as equivalent by the UK Government (as SELTs). The representative explained the proposal in the consultation that, 'to determine which [English language] assessments we should use, we should use the government's list of providers it considers acceptable for visa purposes'. The need for substitute English language proficiency assessment when exemption was given from professional assessments carried out in English also highlights the responsibility (assumed to be) carried by the professional assessments of measuring, in addition, English language proficiency, and how this is taken for granted for applicants who take these assessments. The representative noted that 'we're assessing those [language and communication] skills as well as just knowledge and understanding of the law'.

Unlike the SRA, the engineering institutions participating in this study did not assess English language proficiency through a test of professional knowledge and skills. Instead, the application process for all applicants (UK-based or international) and for all three categories of professional accreditation (Engineering Technician, Incorporated Engineer and Chartered Engineer) required performance in English. Interviewees representing engineering institutions described a written application, which may include a professional portfolio, followed by an interview of every applicant by assessors looking for evidence that they meet the professional competences and commitments set out in UK-SPEC.

The Institution of Engineering and Technology (IET) representative explained the process:

Individuals apply by completing an application in English that has to include information on how they have addressed the various competences and commitments and, providing they have given us sufficient information to satisfy the first batch of assessors that they are happy that the application can proceed, then it goes to another stage which is the professional review interview which lasts an hour and involves a 15 to 20 minute presentation based upon the A and B competences [knowledge and understanding; design, development and solving engineering problems]...So, we don't really have a formal English language assessment, but we have the paper review...then we'll have the interview.

The ethos was one of peer review, and aspects of each application were considered by a total of eight or nine assessors. The representative pointed out that:

All our assessors are professionally registered themselves at the same category of registration as the applicant. They are trained, they undergo training to be able to know what they're looking for, to assess the applications properly, and even when they're new, they observe, or they're paired with more experienced assessors, until they're up to speed.

Some applications were made based on agreements with parallel bodies in other countries. In this case, the interview might still be held, 'to ensure that [applicants] have addressed the competences, their language skills are sufficient, and they can practise in a UK environment'. In contrast to the SRA, therefore, the engineering institutions did not currently apply commercial English language tests.

In this approach, individual contact with each applicant was expected, and the professional experience of the assessors was valued: 'If there was a problem with communicating in English, I can imagine that most of the competences on the report form would not look great, possibly leading to a declined application'. Interviewees were not explicit about how standards were set or how consistency among assessors was established, although robust training was done (see also above).

There's nothing I'm aware of that's formally written down in terms of what constitutes 'effective', what constitutes good enough. It's very much a community sense of what [assessors] see in the working environment. And I guess the judgement call is, if I was working with this person on a project, could I understand them clearly enough that we could come up with secure, safe, innovative engineering solutions? And so the English doesn't have to be perfect, the grammar doesn't have to be perfect, but you have to absolutely understand the intent of the individual and be able to apply that to the engineering that you're working on together.

The IET interviewee also noted that applicants could receive support in the application process from a 'professional registration advisor'. All the assessors and advisors involved in registration applications took on their roles as volunteers. The analogy of becoming a member of a club was used by an engineering representative: 'You have to meet the standard to be professionally recognised. But there's lots of support to help you get there. And if you meet the standard, we absolutely want you to be part of our club'. In the interviews with engineering institutions, there was some recognition that more formal assessment of English language proficiency might be needed in future.

The further alternative to language testing of applicant self-declaration was presented above. The HCPC, a registration body using this method, was consulting about removing it at the time of the interviews. In the GMC interview, it was also indicated that applicants may submit evidence of satisfactory English language proficiency from their employer, although this option was discouraged, and most applicants chose to take a commercial test. Employers often resisted providing such support due to concerns about assuming responsibility for a registrant's subsequent performance.

Representatives often took for granted the use of language tests for applicants trained outside the UK. Tests were seen as objective and measuring what the registration bodies required. Some bodies (e.g., GMC, NMC) offered exemption from providing language test scores for some international applicants, setting out detailed policies – to mitigate risk – relating to, for example, language of professional education and assessment, or time spent in specified countries where English was the dominant language.

5.6 Factors affecting the use (or not) of language tests

People accept the landscape as it is rather than interrogating it.

Little evidence was offered by the interviewees of a registration body seeking feedback directly from new registrants or about them from their employers regarding their performance in the workplace (in terms of their English language proficiency or otherwise) once they had successfully completed the application process. The general view was that any issues would become apparent through complaints or unprompted feedback and the initiation of fitness-to-practise (FTP) cases; that is, the overall system of registration and regulation could be relied upon to bring any problems to light. Interviewees could not easily recall cases in which English language proficiency had been the principal element of a complaint. Instead, those responsible for registration would develop a sense of the general situation using feedback from stakeholders, which may then prompt further investigation or a consultation process: 'What we needed to do was square the circle between what our fitness-to-practise data tells us and what anecdotally stakeholders are telling us'.

The SRA representative gave an example of feedback from applicants that using CEFR C2 as the standard for English language proficiency for registration was too high and how the organisation followed this up: 'We were looking at the written work of some of these complainants and talking to some of them and hearing from their employers that they had been functioning very proficiently in legal practice in English in England for many years even though they haven't been able to reach the C2 level'.

Similarly, the NMC representative indicated that the currently required standard for English language proficiency seemed appropriate: 'To be fair, it feels right in the sense that we don't have a lot of FTP cases...with language issues, not a lot of those. There's no evidence to say that it's too low and plenty of people pass and use it to get onto the register...so it can't be seen to be disproportionately high'.

In most cases, the norm was to accept standards even if they were set for another purpose. As one healthcare representative stated: 'there's kind of an understanding... that these two big providers [IELTS and TOEFL] are longstanding providers of English language tests for students, for people wanting to come and study in the UK, and so there's probably that basis'. Another healthcare representative sought to summarise how current standards were obtained, saying, 'the standards derive from professional consensus identified at the point those professions entered statutory regulation'.

As noted above, practical issues mattered to the representatives. Their contact with test providers was about recognising new tests and different versions of currently recognised tests – for example, they brought up examples of online or at-home test formats and the introduction of the IELTS One Skill Retake option. Their interest was principally in checking security measures in place (e.g., online proctoring) and score verification tools rather than considering issues relating more to test construct, such as new content or task formats.

Representatives' responses indicated that they would find out about a test by asking the test provider rather than reviewing the test directly by looking at sample materials or taking the test themselves, for example. This kind of familiarisation was not mentioned during the interviews, and it seemed to be assumed that providers would deliver tests that were fit for purpose.

When asked whether they had requested or received any advice or support when recently investigating the possibility of introducing new tests, one representative said, 'I think my colleague put a call to Cambridge, I think it was Cambridge, I think that was in the context of IELTS, but we didn't seek anything more formal, no. We did a lot of rummaging around websites, but nothing more formal'. The SRA consultation (see above) relied on the UK Government's list of SELTs:

Our proposal is to take assurance of what checks the government has done when deciding which SELTs it will recognise for these purposes, although I understand that normally the language requirements that will be required by government for visa purposes will be at a much lower level [than we require].

This reliance on other entities contrasted with the more personal position of the registration bodies in the study that did not use commercial language tests. For example, the IET representative explained how their professional registration advisors (see above) interacted with individuals:

To assist an applicant with any enquiries they have regarding the process, to help them review a draft of an application...If a professional registration advisor thought that someone, their language skills were maybe not quite up to scratch, then they would no doubt advise them accordingly.

However, recognising the likely need to use language tests in future, particularly where international agreements were in place establishing equivalence in professional knowledge and skills which would therefore remove the need for their assessment (and consequently also the opportunity to assess English language proficiency concurrently), the representative from the Engineering Council noted the ENIC conference as an event facilitating initial engagement with English language test providers. UK ENIC is the UK National Information Centre for the recognition and evaluation of international qualifications and skills.

5.7 Interaction with the broader environment

We would like to have a cycle of doing a proper review of our standards every three years. We've never been able to get into that space.

Representatives of the registration bodies in the study recognised that the work of their organisations was affected by events and developments in the wider world. They identified the need to be responsive to change. Interviewees expressed varied perspectives on the stability of the overall situation for their professions in terms of English language proficiency requirements and their effect on registration.

Several interviewees reported that the number of international applicants for registration had grown in recent years. They linked this to government policy on immigration and the need to fill vacancies in the healthcare sector particularly. Some interviewees connected this to the UK's withdrawal from the European Union in 2020.

Representatives were conscious of how registration bodies might be portrayed in the media and were sensitive to being challenged on their responsibility to protect the public from negligent practitioners. Healthcare interviewees mentioned the cases of Daniel Ubani and Victorino Chua, the reporting of which put substantial public attention on their work and may have prompted action to review policy and processes.

Regular review (perhaps on a three- or five-year cycle) was suggested as the goal by several interviewees as a means to check the currency and relevance of policy in an evolving operational context. However, some interviewees noted how the COVID-19 pandemic had disrupted their planned review cycle and how other priorities might take up staff resources, also affecting any routine. When undertaken, review might involve asking stakeholders in the professional field for their views on the appropriateness of the current English language proficiency requirements. The HCPC consultation, in progress at the time of the interview, was partly concerned with establishing a stronger review process: 'one of the objectives is to set clear criteria for the tests that we will recognise'. This was due to the increase in the volume of applications and 'anecdotal feedback that comes back from various stakeholders around the level of proficiency that individuals who qualified internationally are demonstrating in practice'. This feedback presented a view that '[new registrants'] capability to communicate to the level required to work within the service and interact effectively with service users just isn't where it needs to be from [some of the stakeholders'] point of view'.

Some representatives indicated a sense of greater ease with the registration policy and processes in operation at the time of the interview, following a period of some disruption and change. For example, in the GMC interview it was noted that the process was smoother following changes to cut scores and the recognition of a new test (OET). The English language proficiency requirement was no longer seen as a barrier and was a 'proportionate requirement', and external pressure to review the accepted cut scores had reduced. There was less 'unhappy feedback' and fewer complaints, indicating that an appropriate balance had been found (at least for the present).

For the HCPC, interviewed during the body's public consultation, the view was that, 'we're reasonably confident in our processes at the moment, but we understand that they could be improved, which is why we're doing the review [consultation]'. The representative for the IET, a body that did not use commercial English language tests, also indicated that their 'holistic assessment...looking at everything', including English language and communication skills, was 'fit for purpose with the applicants that we're getting'. Some concern was expressed about how to deal with the possible use of technology (generative artificial intelligence in particular) by applicants to demonstrate a higher level of English in their written application than they would otherwise be able to.

The EngC representative was also conscious of discussion in professional circles about English language proficiency: 'it's something that I'm sure sooner or later we will be looking more at...language has been quite a live discussion and it comes up every few years'.

The NMC representative felt that, 'we've got it as right as we can, balancing all those competing interests'. They perceived a need to evaluate and gather feedback on the whole registration process more proactively (including English language requirements) and to be more transparent about the registration body's decision-making process around its policies.

5.8 Language proficiency versus other registration issues

It's not that English language isn't important...But there may be other areas that are more of a priority.

The interviewees indicated that considering English language proficiency requirements was only one aspect of their registration work, which also dealt with professional knowledge and skills and issues of ethics in applicants, for example, 'commitment to professional engineering values' (Engineering Council, 2020, p. 7). A representative of a healthcare registration body stated:

We are part of a complex mechanism...an ecosystem, with the system regulators, with professional bodies, with clinical governance, where you're talking about large organisations, we're part of that. We are in essence the bit that supports the individual as part of that complex system.

Nevertheless, standards for language and communication skills were also recognised an important aspect. According to another healthcare representative:

It's a critical element. I mean being able to practise safely and effectively, which is the level at which we set the standards – effective communication in all forms is critical to that...It's the one area of the standards that are quite specific. If you take it in contrast to how all of the other standards are pitched, they're a little bit broader, for a variety of reasons, but the English level standard...is specifically stated.

In the interviews, some representatives discussed technical work done within their registration body that would be pertinent to language test use and validation. However, this was generally applied to the professional knowledge and skills testing that a body administered rather than to the language tests they recognised. The SRA representative described the engagement of a consultant in psychometrics to check analyses of test item performance for the Solicitors Qualifying Examination (SQE) that were provided by the company administering these tests around the world on behalf of the SRA. Bias analysis was carried out: 'Is there anything in the data that suggests there might be a bias against candidates whose first language is[n't] English, by ethnicity, by gender, by age, as you would expect'. The representative also mentioned that items were not pre-tested. Therefore, there was evidence that some registration bodies had access to expertise in assessment practice to develop the tests of professional knowledge and skills they used, and they recognised areas of concern in assessment, such as item length and item bias. However, in relation to English language proficiency, this work was assumed to be more in the purview of the commercial test providers.

A further point made by the interviewees was how the wider role of a registration body meant that, as priorities changed, English language proficiency could not always be in the spotlight. Substantial work done by some bodies (particularly in the healthcare sector) in recent years to deal with feedback on English language proficiency standards and how these could be demonstrated had brought order to this aspect of their work, and attention had to move to other issues. A representative of a healthcare registration body said of the current situation, 'I don't suppose [English language proficiency] is the main priority, because we consulted on adding OET four years ago and that's kind of where we are at the moment'. Another healthcare representative noted about the work of recognising a new test, 'we spent a lot of time talking to [the test provider's representative] and the researchers and all of the people behind that...that took a process of about six months just engaging with OET – we don't have the expertise here in-house to enable us to do that'.

In some professions, the length of compulsory training, examination and workplace practice required for international applicants to 'convert' to UK working standards and practices for full registration made meeting English language proficiency requirements a relatively minor element of the pathway. However, there were also examples of where a body's proposal to simplify the registration pathway by giving some international applicants exemption from specific steps because of their previous training or professional experience then meant that English language proficiency became more prominent. This was due to these steps also being used as an indirect language assessment; in other words, exempting applicants from having to demonstrate professional knowledge and skills also removed the opportunity to assess their English language proficiency concurrently. As described above for the engineering institutions, this increased the need for these bodies to consider language test options. An interviewee from engineering asked, 'if their competent standard [for registration in another jurisdiction] matches ours in every respect except for the ability to communicate in English, do we need to reassess them or do we just need to be confident that they can communicate in English?'

Specific support for practitioners who had recently registered was offered by several of the healthcare registration bodies. The GMC workshop scheme for doctors 'Welcome to UK Practice' was cited by the NMC representative as a model for support that the NMC was to introduce. Similarly, the HCPC had established a professional liaison service that 'helps to support employers in supporting our registrants'. Registrants new to the UK were invited within six months of registration to an online session for 'information about work in the UK, about regulatory requirements'. The HCPC was also developing preceptorship principles, which the interviewee said were based on a support model used in nursing. Preceptorship was:

designed to provide people with support and help them to gain confidence... where [they] perhaps have proficiency, but they don't feel confident with their proficiency...There is always a difference between being able to pass a test...and then going into a busy organisation and having to speak English all the time to lots of different people.

The reason given for introducing these principles was HCPC data showing that new registrants often left the register in their early years of practice, and stakeholders suggesting this could in part be due to 'lack of confidence and challenges'. The principles were to support individuals and make a difference 'across the workforce'.

The NMC representative made the point that support and training for international practitioners should be more reflexive and adaptive:

How can we [the UK healthcare sector] adapt our practice settings and our expectations so it's not just one-way traffic. People are giving up their lives and moving halfway around the world to come and work in our NHS basically, so... there needs to be a bit more sensitivity and support available – not just how you can be like a UK-trained nurse but how they [UK-trained nurses] can understand you and your perspective as well. And we've got a long way to go on that one.

In general, interviewees did not indicate that post-registration support included a focus on developing language and communication skills, perhaps signalling that this aspect of performance was seen more as an initial hurdle requirement than a professional tool that could be further improved.

5.9 Topics of interest for registration bodies

[recognising a new language test] would be a more robust process

Under this heading, we draw together the language testing related topics that interviewees wanted more information about. The data showed that the representatives were well informed about the concerns of applicants and other stakeholders and wanted to investigate these further. However, they were often not in a position, as individual organisations, to initiate relevant research projects.

The representatives of several registration bodies were interested in new research about setting cut scores for their professions in the UK context. They were aware that the basis for current decisions was most likely too dependent on comparison with the scores used by other regulators, in the UK and elsewhere (as described above). For example, the NMC representative expressed this wish but also noted the resources required to fulfil it:

We did commit to sometime in the future doing an independent standard-setting exercise. So that's commissioning a whole group of people and that's, I'm not saying that that's not a good idea, but it's a lot of work to do the proper procurement, getting it all right, it takes time and money, and we're not seeing that pressure, that need to do that right now, given a number of other priorities that we're working on as an organisation.

Specific issues relating to how test scores could be used by applicants to demonstrate that they meet the language proficiency requirements were noted as of interest. For example, representatives referred to 'clubbing' of scores (taking component scores – reading, listening, speaking, writing – from different test sessions to make up an applicant's score profile) and to IELTS One Skill Retake (retaking only one component when the score is just below the requirement). The British Council IELTS Ready resources were viewed as a 'useful development' by the General Pharmaceutical Council (GPhC) representative. The NMC representative argued for the benefits of developing new OET components for speaking and writing specifically for midwives, to replace the current position of requiring midwives to take the nursing test. Interviewees also asked about research on the shelf-life or currency of test scores, seeking further empirical evidence about language attrition under different conditions.

More broadly, interviewees were interested in developing clear criteria with which they could evaluate and select new language tests appropriate to their context. This was seen as valuable in terms of both gaining a better understanding of a test and establishing more practical and efficient ways of doing this work, which had been time-consuming for several registration bodies to deal with.

One of the proposals in the HCPC consultation in progress at the time of the interviews was 'creating a revised and exhaustive list of approved test providers' (Health and Care Professions Council, 2023, p. 9). As noted above, the engineering bodies, which did not use language tests in their current registration procedures, were also conscious of the need to develop a systematic and defensible way to select appropriate tests in the future.

In addition to these technical features of language tests, a representative raised the increasing importance of being able to check aspects of equality, diversity and inclusion (EDI) in a test that was proposed for use: 'We're thinking about EDI aspects here as well, that the tests support our approach to EDI, which is to encourage and support more people with protected characteristics into the workforce...What do providers provide [as] support...related to disability or to do with ethnicity or age?' The public consultations in progress at the time of the interviews included equality impact assessments.

A further area of interest for the SRA representative was to have the SQE – the professional knowledge and skills test that applicants completed in English – reviewed to check 'what level of English language proficiency was required to pass it'. This work had not been initiated because it was not clear to the registration body how to do it or who would do it, 'whether you could unentangle the language skills from the wider lawyer-y skills and the application and understanding of law and practice'.

More generally, related to possible sources of support and advice on language testing issues arising in the work of a registration body, an interviewee noted, 'we don't have any kind of go-to people that are there to help really...I'd love it if there was some people like that'.

5.10 Indicators of language assessment literacy

So, forgive my ignorance, how would you describe your field?
[interviewee to researchers]

To conclude the Findings section of this report, we note instances from the interviews in which representatives showed that interaction with the researchers and our questions may have prompted greater awareness of language assessment in their work ('food for thought', as one interviewee put it). It is of course not possible to know the exact intention of what a person says, but these examples indicate how carrying out this project may of itself have led to greater engagement with language testing. We observe here, too, that the interviewees' responses similarly provoked further thought on our part, as researchers, some of which is presented in Section 6, Discussion.

Some interviewees noted the timing of the current research and how it might have informed language proficiency related work currently being done or recently completed: 'It's a shame that you weren't doing this a year ago when we were warming up to do our consultation'. An interviewee answered a question about whether they had knowledge of research done about English language proficiency in their professional context in the negative, and then continued, 'so maybe I need to add that to my own CPD [continuing professional development]'.

There were also examples of interview questions prompting representatives to note tasks to be completed by the registration body. The EngC representative recognised that, for the core competence 'communicate effectively with others in English', the term 'effectively' was not further defined: 'I'm not sure that we've ever really articulated or analysed what we mean by that. So, I should make a note because we're doing the next round of reviewing the standard next year, and it would be good to really challenge ourselves on those kinds of questions'.

Similarly, the NMC representative noted that the content and task coverage of English language tests had not been mapped onto a model of the professional demands on nurses: 'We've never done that activity, and that might be something that we should think about doing'.

6. Discussion and conclusions

This section starts with a review of the findings presented in the previous section, organised under the research questions given at the beginning of the Methodology (Section 4). The report concludes with some considerations for language testing professionals (and test users), and recommendations for research and researchers.

6.1 How are English language tests perceived and used by professional registration bodies in the UK?

Some of the registration bodies used commercial English language tests as part of their registration processes. This was generally the case for the healthcare bodies represented in this study. Other bodies did not usually use language tests but, instead, relied on performance – taken for granted as being in English – in tests of professional knowledge and skills (for solicitors) and in interviews and written application forms submitted as part of the registration process (for engineers) to provide evidence of satisfactory English language and communication skills. Representatives of the bodies that did not use language tests indicated that more formal and direct language testing would be used, or was being considered for use, in circumstances where an applicant was exempt from taking the proxy English language assessment currently in place, that is, when their professional knowledge and skills were not to be assessed because equivalence of standards had been established across jurisdictions.

The registration body representatives all acknowledged the importance of sufficient language and communication skills for registrants in the professions they oversaw. Having these skills was viewed as part of a professional responsibility to be an effective and safe practitioner. Overall, the registration bodies were confident in the approach they took to confirm these skills, whether using commercial language tests or less overt methods. There was some indication of a trend towards using formal language testing in more registration contexts – for example, a body that had accepted self-declaration of language proficiency from applicants was consulting about removing this option; bodies had increased the number of available tests that they recognised. Commercial language tests were seen to deal efficiently with a complex decision on behalf of the registration bodies.

Conversely, there was no evidence in the interviews that the ongoing use of commercial tests was subject to challenge by the registration bodies. They trusted the test providers to deliver reliable and appropriate measures; their focus was often practical, concerned more with the accessibility of the tests to applicants around the world and test security than with the appropriateness of test content and format. At the time of the interviews, many of the representatives indicated they were comfortable with the language tests they used and the cut scores in place. After an uncertain period for some of the registration bodies, the policies and processes being used were viewed as proportionate, finding a suitable balance between, on one hand, maintaining the standards expected and addressing public safety concerns and, on the other, providing some flexibility for applicants and a sufficient flow of new registrants for employers.

Direct tests of language proficiency were generally required only for applicants whose education and professional training was completed outside the UK. Applicants trained in the UK were assumed to have the language and communication skills required to operate in an English-language workplace. Some registration bodies had detailed procedures allowing certain groups of applicants exemption from the need to take a language test that demonstrated English language proficiency. This was done to reduce complaints about unfair practices, biased against those trained outside the UK, and to facilitate a quicker path to registration and employment. The bodies that did not use language tests made no distinction between UK- and non-UK-trained applicants. Language proficiency was taken for granted in the application process and a lack of proficiency would inevitably reduce the quality of the application or the ability to perform well in the tests of professional knowledge and skills. For the engineering institutions in the study, applicants were seen to be joining a professional community, and the ability to communicate effectively (in English) with other members of their community was viewed as being essential to professional identity.

The representatives of registration bodies interviewed for this study viewed their role as managing tensions between the needs of society and needs of their profession, including the effects of recent increases in the number of applicants from outside the UK. As bureaucratic institutions, they appeared somewhat cautious about instigating change in policy and practice, and often referred to precedent. They sought to be consistent with peer bodies, preferring to take a consensus approach to deciding the language tests to recognise and the cut scores to adopt rather than using empirically-based methods to determine these issues. They often relied on the advice of test providers and informal interaction with comparable organisations (in the UK and elsewhere). Public consultations were a further important means to canvas opinion and test out possible changes to policy.

6.2(a) What knowledge of language assessment do UK professional registration bodies have?

The interviews offered substantial evidence that, across UK professional registration bodies, there was some knowledge of different aspects of assessment and language assessment, including pockets of expertise. Many of the interviewees had a clear understanding of the detail directly affecting their registration remit: for example, about how component test scores on the test(s) they used were combined to create the overall result, and under what circumstances scores from different test sittings might be combined. There was less evidence of understanding of more abstract issues in language testing, for example, the principle of demonstrating how the context of language use (the domain) linked satisfactorily to the purpose and content of a language test, as set out in the test specification, or the process by which certain test scores were invested with meaning allowing them to be used as cut scores. Registration bodies tended to trust test providers to convince them of the quality of a test, and more attention was paid to practical aspects of this than to construct-related aspects. In some cases, particularly where a registration body developed and administered tests of professional knowledge and skills, there was greater knowledge of more technical aspects of assessment, such as determining the quality of test items through statistical analysis of test results, carrying out bias analyses, and considering test reliability and validity. However, this understanding did not appear to be applied directly to the assessment of English language, and any work to confirm test quality was viewed as the concern of the language test providers, as noted above.

IELTS was the focal test for several of the representatives, and, in these instances, other tests and their cut scores were only considered in terms of their equivalence to the IELTS 'standard'. Sometimes the original purpose of IELTS as a test of academic English was noted, and its use for other purposes criticised, often through comparison with the OET, which was presented positively by some representatives of healthcare registration bodies as a workplace-related test of language. However, there was no indication from interviewees that IELTS might be replaced altogether by other, potentially more suitable tests. Similarly, interviewees representing bodies where language tests were part of the registration pathway did not consider the possibility of replacing them with less overt language assessment options as described in Section 5.5.

The interviews provided examples of work relating to language assessment that staff at several of the registration bodies had done or were doing: for example, making contact with academics with language testing expertise, commissioning research reports from those academics, interacting with researchers working for test providers, attending events organised by test providers to obtain information about new features of test delivery and administration, maintaining informal channels of communication with counterparts in other registration bodies in the UK and elsewhere, holding public consultations on current issues, carrying out data analysis relating to applicants, and initiating research projects or commissioning research from in-house research staff.

Some assumptions about language testing made by the representatives were likely the consequence of an uncritical perpetuation of longstanding practice. There was a desire for stability and conformity, with a goal of keeping the registration body out of the media spotlight. Registration bodies generally did not seek feedback from recent registrants or their employers on whether the tests (or other procedures) used for registration had delivered what was expected.

Many of the interviewees had a great deal of experience in the policy environment of professional regulation in the UK. Some had long experience with the same body while other interviewees reported moving between similar roles in different registration bodies during their careers, with these two contrasting employment profiles both having potential benefits to employers, in terms of the maintenance or sharing of expertise. In some institutions, specific individuals seemed to be relied on to provide the institutional memory of policy decisions and what had prompted them. Some interviewees noted their concern that this record was being lost in their own organisation ('all of this precedes anyone in our team').

6.2(b) What knowledge or skills (if any) do UK professional registration bodies want?

Based on this study, the current situation might be presented as different UK regulation bodies all moving towards an increased and more systematic use of commercial language tests. Some healthcare bodies, for example, GMC and NMC, used IELTS and OET alongside professional assessments, also having detailed language test exemption policies. They may be seen as further along the path than others, and the GMC in particular has a decades-long history of language testing for internationally trained doctors. Following the GMC and NMC on this path were, for example: HCPC, a body considering the removal of self-declaration as an option for applicants and the introduction of a list of language tests it recognised; SRA, using professional tests as proxy language assessments; and the engineering institutions, using written application forms and interviews on professional knowledge and skills as the means also to assess applicants' English language proficiency and communication skills. Due to the complexity of the situation, it is understandable for different bodies to have different needs and wants.

Several interviewees were keen to establish a more transparent and robust procedure for their organisation to follow to evaluate new language tests for use. They were conscious of the importance of this task, the resources required to do it well, and the need for an independent view of the suitability of a test for their context. Previous and current attempts were seen to be impromptu, relying considerably on claims made by the test provider. Despite a sense that the situation was under control at present, allowing resources to be directed elsewhere, it was understood that concerns related to establishing applicants' English language proficiency would arise again, and it would therefore be beneficial to put a more systematic approach in place.

One interviewee was interested in the possibility of a list of expert language testing practitioners and advisors who might be contacted for guidance or to be involved in future research projects. As illustrated at the end of the Findings (Section 5.10), some interviewees expressed surprise at the existence of a field of research in language testing and assessment, indicating that they had contact with expertise on language testing only through representatives of commercial test providers.

More broadly, the representatives in the study expressed their interest in the topic of this research, by requesting a copy of the final report, for example. (We note, however, that self-selection bias might be at play here, as other potential representatives declined to participate in the study.) Instances were given in the Findings (Section 5.10) of how our questions prompted the interviewees to add related tasks as goals for their own professional development or as part of a future review of policy and practice. Therefore, a research study on English language assessment interests and needs perhaps provided an opportunity for reflection, offering an alternative and useful perspective to those involved, although it did seem that the topic was not generally a current or principal focus of the representatives' work.

6.3 Considerations for language testing professionals

As members of the group of 'language testing professionals', the researchers found it useful to learn more about the perspectives on language testing and assessment of one group of test users, namely, a selection of professional registration bodies in the UK. This report shares what we learned with other professionals in the field of language testing; it also indicates that the representatives of registration bodies who agreed to participate in our study may also have taken away some new insight into language testing from their engagement with us. We argue that this interaction between language testing professionals and test users is valuable in itself. The research interviews and the report published about them have the potential to affect future interaction and research. This is therefore one way to promote language assessment literacy (LAL) among test users and policy literacy among language testing professionals. Creating opportunities for engagement becomes a means to foster more effective communication between staff members at registration bodies and language testing practitioners and researchers, which was a goal of this study. Engagement may encourage the recognition of the expertise held by both parties involved and draw out complementary goals to work towards.

More opportunities for engagement may be found by raising the profile of professional associations in language testing. Some interviewees had little knowledge of the field of language testing and seemed amenable to finding out more. Professional associations might approach registration bodies to explain their role as a possible source of information and expertise not linked directly to commercial test providers.

Various resources for test users have been made available through professional associations in language testing, and these options could be promoted more strongly and developed further. For example, UKALTA is developing a series of briefing sheets for a broad audience, as part of a 'commitment to communicating and engaging with a range of test stakeholder groups and to promoting language assessment literacy for the public good' (UKALTA, n.d.-a, para. 1). The European Association for Language Testing and Assessment (EALTA) has a list of expert members 'willing to provide expert advice/ consultancy and present at seminars/conferences' (EALTA, n.d., para. 2).

Providing training in the form of workshops or webinars has previously been suggested as a way to promote LAL among test users. In the context of UK registration bodies, our findings indicated that having a specific focus for a workshop would be more likely to generate sufficient motivation for representatives to attend, perhaps dealing with issues that were noted as being of current concern by interviewees. If run by professional associations, workshop content might be recorded and made available on their websites for self-access at any time to increase the potential audience.

The provision of templates providing a framework to review a new test or evaluate current practice for how language tests are used by a registration body would respond to needs expressed during the interviews for this study. These might be derived from or linked to guidelines for good practice published by EALTA (2006) and ILTA (n.d.), for example. Sets of questions or a checklist format could guide test users to consider aspects of language test selection and use for their professional context. Developing such a framework might be carried out as a collaboration between a registration body and language testing professionals.

It is important for language testing professionals also to consider the assessment practices of registration bodies that do not use commercial language tests. In the interviews, representatives indicated interest in ways to check the linguistic demands of items used in tests of professional knowledge and skills delivered in English. The expertise of some language testing professionals in developing effective texts and items for test use could inform this kind of review, while also considering the relationship of the demands of the tests taken during registration to professional practice in the domain. Similarly, it might be possible to use language testing expertise to make the assessment of language proficiency through interview performance or the content of written application forms more explicit and systematic by developing language- and communication-focused criteria that assessors could be trained to apply. This would maintain the benefits of one-to-one assessment while better controlling the construct under consideration and reducing concerns about inconsistency of approach among assessors.

This model of assessment – engaging individually with each applicant and involving one or more members of the profession as assessors (as applied by the engineering institutions) – provides food for thought for the field of language testing, as it allows for the applicants to show their linguistic range and for the registration body to gain a direct understanding of their ability to perform, and does so in a way that makes malpractice (e.g., cheating by impersonation) difficult. The process is located in a professional context and can even be tailored to the demands of an applicant's future role, perhaps involving a task-based approach, where success is measured by how efficiently a job-related task is completed. While it may not suit registration sectors with large numbers of applicants to be processed, there is a robustness to this personalised model.

To summarise this section, some possible actions that might be undertaken by language testing practitioners and organisations with test users (registration bodies) are listed below.

- Holding workshops/webinars to: (a) develop clear construct definitions, describing in detail aspects of language and communication skills valued in the professional domain, perhaps including, for example, interactional and (inter)cultural competence; (b) discuss various potential assessment formats and designs and how they permit the elicitation and measurement of language skills.
- Carrying out a domain analysis to provide a comprehensive description of language use in a professional domain and consequently allow comparison with the scope of language assessed in tests used for registration purposes.
- Establishing empirically appropriate cut scores on a test used for a particular professional domain (i.e., standard setting).
- Developing a template checklist or framework to evaluate more systematically the suitability of new language assessment products for a professional domain (determining test quality and fitness for purpose).
- Investigating language attrition under different conditions to inform policy on the shelf-life (currency) of test scores.
- Considering the feasibility of alternatives to formal language testing and their affordances and constraints.
- Raising awareness of resources, guidance and support available from professional associations for language testing and assessment.
- Completing these and other activities through collaboration between test users and practitioners in language testing and assessment for mutual benefit.

6.4 Recommendations for research and researchers

6.4.1 Methodology

Using semi-structured interviews and thematic analysis of the data, we believe that we were able to draw out the concerns of our research participants. We sought to take a bottom-up approach to understanding their interests and needs. By trying to put ourselves in other people's shoes, we can understand better their situation. This offers a more appropriate starting point to achieve goals we might set in this context relating to fostering LAL, for example, and we therefore suggest that progress has been made with this study. We also observe how the activity of talking with people in professional roles beyond our field about language testing and assessment contributes to LAL by raising awareness and prompting thought and action relevant to the current situation of the interactants (interviewers as well as interviewees). This flexible and voluntary engagement (whether or not it is linked to a research study) may be well suited to promoting LAL.

The concern remains that this engagement activity – the research study – was initiated by language testing researchers and funded by test providers; full collaboration with participants was not part of its design. The questions we used in the interviews elicited information that the researchers wanted to know about, but they possibly limited the possibility of other ideas being introduced by the registration body representatives themselves. Consequently, some caution is needed in appraising the project. It may not offer a solution, but it has provided a point of departure. The study offered a model for initiating greater collaborative engagement between language test practitioners and professional registration bodies, which might be a useful prototype for similar engagement with other test users by language test researchers and practitioners.

6.4.2 Limitations of current study

The scope of this study was set to match the time and resources available to the researchers. It proved more difficult and time-consuming than anticipated to recruit participants. Decisions made about who we would invite to participate and the reluctance of some bodies that we approached to do so limit the study's representativeness of UK professional regulation bodies. Bodies using language tests or with an interest in assessing the language and communication skills of applicants were more likely to respond to our request for an interview, creating a self-selection bias in our data. It is not possible to infer what non-participants in the study might have contributed. Similarly, reasons for non-participation can only be guessed at. (However, lack of evidence does not absolve the field of language testing from considering other ways to achieve the involvement of these bodies in the endeavour to develop LAL.)

As noted above, the study was led by language testing researchers, and its data were also analysed and interpreted from this perspective. As described in Section 4.6, the report was shared with interview participants before publication to confirm the fidelity of its findings to their views; however, this was an element added to the original study. Further opportunities for checking the views expressed in the report and for obtaining feedback might be arranged, for example, through presentations to participants and representatives of registration bodies following the report's publication. In any case, this exploratory study has provided initial data in an unresearched area which can now be investigated further.

6.4.3 Future research

As well as seeking feedback from participants on the findings presented here, it would be beneficial to carry out similar interviews with further professional registration bodies in the UK that were excluded from this study. The potential value of expanding the scope of the study is high. For example, many workplaces rely on good communication, while the language and communication skills of applicants may not be considered in a registration process that focuses only on technical or other professional knowledge and skills.

The interviewees in the study made us aware of very large quantities of data that could potentially be accessed for research into the language demands and expectations of different workplaces and professions. For example, studying the written applications submitted to the engineering institutions would provide insights into how professionals express themselves and describe their work. This might then be compared with the writing that registrants do in the workplace to determine the extent to which the application process maps onto performance in the professional domain.

6.4.4 Concluding remarks

The findings of this study offered language testing professionals a better understanding of how language and communication skills were currently assessed by some of the professional registration bodies in the UK. Generally, this was done using either commercial language tests or assessment by other means. Findings set out various perspectives on language testing held by representatives of the registration bodies who were interviewed and offered some insight into how they valued language and communication skills for professional groups in the workplace. Overall, participants in the study recognised the importance of effective language and communication skills in the practice of the professions they regulated. Findings showed some areas of expertise related to assessment across the registration bodies, as well as gaps in expertise, indicating areas where language testing professionals might focus efforts to promote greater knowledge of their field. Taking the findings about the language assessment interests and needs of professional registration bodies, the researchers reflected on how these might be addressed and argued that collaborative engagement among language testing professionals and registration bodies would be appropriate.

Regarding the subtitle of the study, we note that 'an unconsidered perspective' might be applied to two aspects of this topic. The intended meaning in the research proposal was that language testing researchers and practitioners might not be giving sufficient attention to the views of professional registration bodies (as one of the stakeholders in their work), and that a better understanding of the bodies' interests and needs was required, as part of the discipline-wide project of developing the LAL of all test users. Another unconsidered (or, at least, limited) perspective also noted during the study was held by some registration bodies relating to the language tests they used. While attention was given to practical and security-related aspects of tests, consideration of issues about test construct was sometimes lacking – for example, the appropriateness of a test for a context of use might be taken for granted. We believe that the study has demonstrated the benefits for the two groups concerned of considering these perspectives further.

As Vogt et al. (2024) proposed, regarding a definition of LAL that includes engagement with contextual factors, 'The way forward might be to continue developing context-sensitive, pluralistic and differential heuristics, appropriately accommodating the needs of various stakeholders and situations' (p. 2).

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Appendix A: Request to participate

(Example of the message sent to regulatory bodies by email or web-based enquiry page)

Subject: Interview request for research study

We are academic researchers at Lancaster University and the University of Huddersfield undertaking a research study titled 'An unconsidered perspective? An investigation of the language assessment interests and needs of professional registration bodies in the UK'.

We are approaching [regulatory body] to invite your participation in our study, as a UK professional registration body. We would like to interview a representative from your organisation who is involved in making decisions about (1) the body's use (or not) of English language tests and, if relevant, (2) the application of test results to registration outcomes. We are interested in the perspectives of your organisation on the use of language tests for professional registration purposes and on support that might be offered in this area.

Language test practitioners and researchers have not paid sufficient attention to professional bodies which (could) use test scores to inform decisions relating to the registration of applicants seeking employment in the UK, including those whose first language is not English and/or who trained outside the UK. The study seeks to understand better the interests and needs of these stakeholders (the registration bodies) so that test developers and researchers can engage more effectively with them.

The interview will take up to an hour and can be held in person at the workplace or online using videoconferencing software, at the interviewee's convenience. The interview will be led by one or both of the researchers, and we will provide in advance a series of questions and topics that we would like to cover.

We anticipate involving registration bodies in our study to cover a range of professions, including those who regulate entry to a profession directly and those that provide professional accreditation only.

Participants in the study have the opportunity to share the views of their organisation on the value and current/future use of language tests by professional registration bodies in the UK. Input into the study may inform how language test practitioners and researchers provide information and support to stakeholders (registration bodies and others) in the future. We are aware that [regulatory body] is involved in developing policy on English language. [regulatory body]'s views will therefore be most useful for our research.

The study is funded by the British Council through the International English Language Testing System (IELTS) Joint Funded Research Program. The study has been reviewed and approved by the Faculty of Arts and Social Sciences and Management School Research Ethics Committee at Lancaster University.

We can provide the participant information sheet and consent form for the study. To contact us, please email Dr John Pill (j.pill@lancaster.ac.uk).

We look forward to your positive response so that we can proceed to setting up an interview with the nominated representative.

Best wishes

Appendix B: Interview format (overview for participants)

(This was sent to each participant in advance of the interview.)

1. Introduction

Explanation of the objectives of the study.

2. Guiding questions

What is the purpose of your organisation's use of an English language assessment?

What other professional requirements are there?

Which English language testing or assessment systems does your organisation use?

How many people will have their English language proficiency assessed in any one year?

Is this number increasing or decreasing?

How was the decision made on the appropriate levels?

Who was responsible for making the decision?

Was any advice or support requested or received from the assessment provider in making the decision on appropriate levels?

Was any advice or support requested or received from any other organisation?

Are you aware of any gaps in the assessments used for the purposes of your profession?

What other language assessment systems/strategies are accepted? What are the levels accepted?

Which assessment systems/strategies suit your organisation best and why?

Have candidates expressed a preference for a particular test? If so, which one and why?

Have you had any feedback about how the candidates perceive the process of language assessment?

Is there a strategy in place to follow up newly registered people or to seek feedback from their employers once they are in the workplace, to ensure that they are coping in terms of language skills?

Have you had any complaints about the language levels of those who have attained the required level and are in the workforce? If so, how do you respond to them?

Do you know of any research, articles or discussion papers that have been published into English language competency or testing and assessment in your profession by professionals in your field, academics, government or other relevant bodies? If so, please provide a copy or access details (name, author, publisher, year).

Do you have any further comments or issues you wish to raise?

Appendix C: Full interview question guide

(The sections are led by each interviewer in turn, [A] then [B].)

1. Introduction [A]

Introduce interviewer(s), interviewee(s) [name, professional role].

Explain the objectives of the study:

- To explore the interests and concerns of bodies that deal with professional registration or accreditation in the UK about English language assessment (in the context of professionals coming from elsewhere to practise/work in the UK)
- To learn about how the body uses (or does not use) language tests and what aspects of this it views as working well (or not)
- To understand better how language testing practitioners and researchers might communicate more effectively about their work and offer support to registration bodies

We don't have any particular agenda. We don't represent a language test or a view of how language testing should be used. The study is about understanding the perspectives of registration/accreditation bodies.

2. Guiding questions

Regulatory body's role [B]

- What is the role/purpose of your body (registration/accreditation)?
What is its scope (UK/England/international)?
Do you deal with more than one profession(al role)?
- How many new registrations/accreditations do you process annually?
How many applicants are from outside the UK? Do you deal with non-UK applicants differently from UK applicants?
- What requirements are there for an individual's registration/accreditation? (e.g., degree, professional exams, police background check, right to work in the UK, English language proficiency)
- Is the regulatory 'regime' seen as light/heavy touch?
Where does legal responsibility lie for checking these requirements?
- What is the history (briefly) of the body's involvement in professional regulation?
When was regulation for the profession (and for applicants from outside the UK) introduced? Was there a specific event/incident that triggered the introduction of regulation?

English language assessment practice [A]

- What is the purpose of your organisation's use of an English language assessment?
- Which English language testing or assessment systems does your organisation use?
- How many people need to demonstrate English language proficiency annually?
Is this number increasing or decreasing? What is the general profile of this group (e.g., country of origin, place of training, level of professional skills)?

Has this profile changed in recent years?

- How was the decision made on the appropriate levels of English language proficiency? Who was responsible for making the decision?
- Was any advice or support requested or received from the language assessment provider(s) in making the decision on appropriate levels?
- Was any advice or support requested or received from any other organisation or individual?

Quality assurance [B]

- How confident does the regulatory body feel about the English-language-related decisions it has to make?
Has there been a study/review process of outcomes to see whether the decisions made are the best ones for the profession, i.e., whether newly registered professionals 'fit' and can practise effectively?
- Are you aware of any gaps in the assessments used for the purposes of your profession? (areas you would like to assess that are not currently assessed)
- What alternative language assessment systems/strategies are accepted? What are the levels accepted?
- Which assessment systems/strategies suit your organisation best and why?
- Have the systems/strategies in use changed over time? How often are they reviewed? Is there a regular process of review?

Stakeholder perspectives [A]

- Have applicants expressed a preference for a particular test (or an alternative application system/strategy)? If so, which and why?
- Does the body ask for feedback from applicants about how they perceive the process of language assessment?
What about from their employers? And from those who engage with the professionals, the public? (What evidence is collected about the quality/validity of the registration/accreditation process?)
- Is there a strategy in place to follow up newly registered professionals or to seek feedback from their employers once they are in the workplace, to ensure that they are coping in terms of language skills?
- Have you had any complaints about the language levels of those who have attained the required level and are in the workforce? If so, how do you respond to them?
- Do you know of (and have you referred to) research, articles or discussion papers on English language competency or testing and assessment in your profession, e.g., published by professionals in your field, academics, government or other relevant bodies? If so, please provide a copy or access details (name, author, publisher, year).

3. Round-up [B]

Do you have any further comments or issues you wish to raise?

Thank for participating. Outline next steps and expected publication process.