



POLICY NUMBER:	2.21	VERSION NUMBER:	10.0
DATE LAST REVIEWED:	March 2026	NEXT REVIEW DATE:	March 2027
RELATED POLICIES:	Academic Progression Policy Disability Policy Students At Risk	RESPONSIBILITY: Academic Council	
RELATED PROCEDURES:	NA		

ENGLISH PROFICIENCY POLICY

1.0 Purpose

This Policy outlines the process by which higher education students and staff of the College may have language, literacy and numeracy issues effectively addressed.

2.0 Scope

- All campuses (including online)
- All academic staff (including contract academics)
- All higher education students
- All Admissions staff
- All Student Services staff

3.0 Policy Statement

- 3.1 All courses at the College are delivered in the English language. It is essential that a student has language, literacy and numeracy (LLN) skills sufficient to successfully complete assessments at the higher education level as reflected in the Australian Qualifications Framework (AQF). Higher education qualifications offered at the College are located at levels 5 to 8 of the AQF and are designed and accredited to enable graduates to demonstrate the learning outcomes expressed as knowledge, skills and the application of knowledge and skills specified in the AQF level criteria. Refer to the AQF website for details.
- 3.2 It is also essential that academic staff have LLN skills sufficient to communicate course content to students in a manner that is clearly understandable. The College provides clear information to each prospective student and staff member on enrolment about language, literacy and numeracy requirements including the provision of registering as an English as a Second Language (ESL) student if students self-identify as having difficulties.
- 3.3 Student LLN skills are not assumed upon admission and students who identify as having a LLN concern may be asked to attend an English language evaluation session or test with an external organisation.

4.0 English Proficiency Requirements and Support – Students

- 4.1 Students who identify with English as a Second Language (ESL) or who demonstrate difficulty with the English language during their course admission process or studies are eligible to register for the ESL Program which includes the provision of 'reasonable adjustments' to assist a student with English difficulties to equally participate in College life and course requirements.



All adjustments are approved and agreed to by the student and a Student Adviser and an approved reasonable adjustment plan is implemented. All reasonable adjustment plans are to be supported by certified ESL documentation. An example of reasonable adjustment for students with English difficulties may include providing additional exam time or allowing a dictionary to assist in completion of an exam.

- 4.2 All Higher Education applicants or students for whom English is an additional or second language including permanent residents and citizens must meet the English language proficiency requirements for entry into Higher Education study at the College.
- 4.3 Any student wishing to register on the ESL Program must have an assessment of English language on file, and if not attained through the admissions process, will be required to provide one prior to any supports being provided. This assessment will form the basis of the ESL Program registration and the subsequent reasonable adjustments provided.
- 4.4 Prospective or current students for whom English is an additional or second language will be required to undertake an assessment of English language at their own cost and, depending on the course of enrolment, achieve a result at least equivalent to the minimum standards required in the Inherent Course Requirements and outlined in this Policy.
- 4.5 These levels have been set to ensure the student will:
 - Have the ability to successfully engage in study in their selected field at the relevant AQF level; and
 - Where relevant, have the ability to meet registration requirements with the Australian Health Practitioner Regulation Agency (AHPRA) and the Chinese Medicine Board of Australia (CMBA). Students who require registration with Practitioner-related agencies and boards may need to meet additional requirements to be registered and should refer to industry websites.
- 4.6 The approved English language tests and minimum standards are:
 - 4.6.1 Bachelor of Health Science (Acupuncture Therapies), Bachelor of Health Science (Chinese Medicine), Diploma of Health Science (Chinese Remedial Massage) and postgraduate qualifications:
 - IELTS 7.0 (no sub score less than 6.5)
 - Cambridge English: Advanced (CAE 185-190, no sub score less than 176)
 - Pearson (PTE) Academic Score of 65 (overall score, with a communicative skills score in writing 58 or above)
 - Internet based (iBT) TOEFL score of 100 (with a minimum of 24 or above in writing).
 - 4.6.2 All other Bachelor degrees and Undergraduate Certificates (other than Human Biology, as below):
 - IELTS 6.5 (overall score – no sub score less than 6.0)
 - Cambridge English: Advanced (CAE 176-184)
 - Pearson (PTE) Academic Score of 59 (overall score)



- Paper based (PBT) TOEFL (Test of English as a Foreign Language) score of 577
- Internet based (iBT) TOEFL score of 90.

4.6.3 Diploma of Health Science and Undergraduate Certificate in Human Biology:

- IELTS 6.0 (overall score – no sub score less than 5.5)
- Cambridge English: First (FCE 169-175)
- Pearson (PTE) Academic Score of 52 (overall score)
- Paper based (PBT) TOEFL (Test of English as a Foreign Language) score of 537
- Internet based (iBT) TOEFL score of 79.

4.7 The College sets the minimum course requirements in an approved English language test.

- English test results must be no more than two (2) years old at the time of enrolment
- English test results must meet the minimum standards for entry into the College
- After provision of the scores above, if it is identified that a student's English language skills are not proficient across all areas of LLN the student may be required to undertake a further external test at the student's cost
- Certain professional bodies have English language requirements which must be satisfied prior to registration and practice in the field (e.g. AHPRA and CMBA for Acupuncturists).

4.8 The College reserves the right to request that a prospective or current student undergoes an English test and / or provides certified documentary evidence of their English level to meet the Inherent Course Requirements and the minimum English language proficiency requirements. This will also be required by any student wishing to register for the ESL Program.

4.9 As the College's course entry requirements meet professional body English language requirements for registration, the College takes great care in:

- Ensuring students meet those requirements; and,
- Will seek further testing of any student (domestic or international) who may be identified as struggling with English language proficiency and skills.
- If a student fails to meet the minimum HE English language proficiency requirements after further testing, the student will be required to seek further English skill building at their own expense.

4.10 Permanent residents and citizens – English language requirements

4.10.1 All prospective students (except Acupuncture / Chinese Medicine students) - Permanent residents and citizens where English is a second language may be exempt if certified supporting documentation is able to be provided that supports:

- a 'full time equivalent' education confirming the completion of five years of study being taught and assessed in English in Australia, Canada, New Zealand, Republic of Ireland, South Africa, United Kingdom or United States of America



- completion within the last two (2) years in Australia in English of senior secondary certificate or a substantial component of a course at AQF level 4 or higher (i.e. Certificate IV or above)
- significant work experience in an environment where English is spoken as the primary language and willingness to undergo an interview in English with College representatives.

4.10.2 The certified supporting documentation will be assessed and may be accepted for the purpose of meeting and applying the acceptance of the English language proficiency standards of this policy. Any exceptions to this policy will be assessed and/or approved by the Director of Sales and Admissions or Director of Education only.

4.10.3 Acupuncture Therapies or Chinese Medicine prospective students - may be exempt from taking an English proficiency language test if evidence is able to be provided that supports the student meeting the CMBA and AHPRA requirements. A student is to refer to the industry websites that outline these requirements. This documentation will be assessed by the Director of Sales and Admissions in consultation with the Head of the Department - Chinese Medicine, and may be accepted for the purpose of meeting and applying the acceptance of the English language proficiency standards of this policy.

4.11 ESL reasonable adjustment plan reviews

4.11.1 All students who have identified as ESL will be contacted by a Student Adviser to complete an annual review of the reasonable adjustment plan. At the time of the review an ESL student may be asked to produce:

- Supporting documentation that supports current English proficiency including the passing of subjects recently studied.

4.11.2 If a student has been identified as a Student at Risk (SaR) due to subject failure and not meeting the minimum English language proficiency requirements, the student will be required to seek further skill building in English at their own expense. Students may be required to defer study at the College while undertaking further English tuition and may be required to undertake further testing at their own expense to prove English proficiency prior to continuation of their studies.

4.11.3 An ESL strategy for a SaR may require the student to:

- Undertake a series of English language classes at their own expense
- Take a further English language test and produce certified documentation that meets the minimum English proficiency standards outlined in this policy
- Provide certified documentation and evidence that supports meeting the AHPRA English Language Skills Standard. A student is to refer to the industry websites that outline these requirements
- Be placed on probationary enrolment, and meet the conditions of that probationary enrolment (this may include study load changes, academic achievement requirements, or other accommodations)
- Be excluded from study as per the Students at Risk Policy.



- 4.12 A number of differing support options for students can be implemented and may include the following:
- Additional testing to determine level of English support required including external testing at the student's cost
 - Pairing the student with a study mentor or buddy that demonstrates well developed English language skills
 - Additional self-study review
 - Additional examination time
 - Allowing a standard word for word dictionary in the classroom (no medical dictionaries with word to word explanations or diagrams are permitted in the examination room).
- 4.12.1 If a buddy with the necessary expertise or resources to provide assistance is unavailable then it is appropriate to refer students to local external language support services. In special circumstances it may become appropriate to use the services of an external specialist to develop a specific language program such as AMES. Information on AMES is available at: <http://www.ames.net.au>. Students are expected to cover any costs involved in order to access external English language support.
- 4.12.2 The College acknowledges its responsibility to support students with LLN difficulties within the scale and scope of its operations. College Lecturers and Supervisors are urged to use direct or indirect strategies to assist students experiencing difficulties and register the student as 'At Risk' (SaR) with Student Services for appropriate follow up and assistance where required.
- 4.13 The LLN Strategy at the College recommends individual and group support to enhance learning for students. The following strategies are implemented:
- Planning teaching
 - Provision of study buddy, mentor, coach when available
 - Modifying learning materials where appropriate that do not compromise the integrity of the assessment
 - Referral to external agencies for literacy and numeracy courses
 - Providing flexibility in learning and assessments delivery modes
 - Scheduling and access to support services and registration into the ESL program.
- 4.13.1 The College employs a number of teaching and learning strategies including the use of verbal explanations, diagrams/charts, group presentations, demonstrations, incorporation of workplace materials, modelling and activities to assist with differing student learning styles and requirements.
- 4.14 Where it is a requirement of course learning outcomes, students may require specific language and terminology. Where lack of expertise risks a successful outcome for the student, the matter should be referred to the Dean who will work with the Head of Learning and Teaching as per the Student At Risk (SaR) process.



5.0 LLN Assessment

- 5.1 Whilst preferable, LLN testing for students is not mandatory under the Australian Qualifications Framework (AQF), however provision is to be made for assessments where it is requested and appropriate. The College reserves the right to determine how and to whom the assessment is provided. The following points should be noted:
- Experienced and qualified lecturers understand which content and curriculum may prove difficult or challenging and what specific skills are required
 - Lecturers are expected to identify Students At Risk (SaR) and know when to refer to Student Services for appropriate follow through and follow up on 'reasonable adjustment' support strategies
 - Students may indicate or self-disclose their LLN requirements and be referred to the ESL program for 'reasonable adjustment' support
 - Students can ask for additional support during their course of study and may be referred to external agencies for further skill building support at their own expense
- 5.2 The College's higher education courses require proficiency in LLN skills and may require additional support.
- 5.3 On enrolment, the Student Enrolment Advisers provide prospective students with information about the teaching and learning environment and seek to gain an insight into the learning styles and language preferences of the applicant. The College uses this information to make informed choices about a prospective students' capacity to meet the course requirements and to ascertain if additional support is required. The Student Enrolment Adviser will discuss the prospective student's LLN capabilities.
- 5.4 A prospective student for whom English is an additional or second language will be required to meet the minimum English language proficiency requirements to be eligible to enter into Higher Education study at the relevant AQF level. A student will be required to present a certified copy of their English language level prior to admission into the College. A student may require an external assessment, at their own cost to occur before admission to the College.

6.0 Staff

- 6.1 Academic staff who identify with ESL must have a grasp of the English language appropriate to teach in higher education, and will be required to show evidence of appropriate English language proficiency. This level has been set to ensure the staff member will have the ability to successfully impart knowledge to students at the appropriate academic level through all forms of communication. At the discretion of the College, prospective Higher Education academic staff who demonstrate difficulty with English language may be required to undertake an assessment of English language at their own expense and achieve a result at least equivalent to:
- IELTS 7.0 (no sub score less than 6.5)
 - Cambridge English: Advanced (CAE 185-190, no sub score less than 176)
 - Pearson (PTE) Academic Score of 66 (overall score, with a communicative skills score in writing 58 or above)



- Internet based (iBT) TOEFL score of 100 (with a minimum of 24 or above in writing).
- 6.2 English test results must be no more than two (2) years old. After provision of scores above, if it is identified that a prospective staff member's English language skills are not proficient, the College reserves the right not to employ that person.
- 6.3 Current staff teaching in a Higher Education course who are identified as having English difficulties (such as through student feedback) may be required to undertake an assessment of English language at the expense of the College. If the results outlined above are not achieved by an existing staff member, the College may take appropriate action such as reassigning the teacher to a lower level subject, reassigning the teacher to administrative duties while English levels are increased, and / or enrolling the staff member in further English classes.

7.0 Further Resources

- AMES Australia plays a significant role in successfully settling in new arrivals with a broad range of settlement and English language courses and services. AMES offers a range of English courses from beginner to advanced level. Refer to the website: <https://www.ames.net.au/learn-english>
- English Australia is the national peak body for the English language sector, specializing in International education in Australia, this organization also supports any students seeking to study English with a representation of over 120 member Colleges throughout Australia that provide quality English programs to students and professionals from around the world. Refer to the website: <https://www.englishaustralia.com.au>
- The Australian Core Skills Framework (ACSF) is designed to support a consistent national approach to identifying and developing five core skills. It provides shared concepts and language for identifying, describing and discussing core skills. It also provides an approach for benchmarking, monitoring and reporting on the performance of core skills. These skills are learning, reading, writing, oral communication and numeracy. Refer to the website: <https://www.lincommunity.com.au/literacy/>
- LDA is an association of teachers and other professionals dedicated to assisting students with learning difficulties through effective teaching practices based on scientific research. Refer to the website: www.ldaustralia.org
- The Australian Government offer a series of courses to support students into Higher Education. These courses include English for Academic Purposes (EAP) and English for Specific Purposes (ESP). There are a range of courses offered on a state-by-state basis. Refer to the website: <https://www.studyinaustralia.gov.au/english/australian-education/english-courses>
- TalkEnglish offers a series of English lessons online for students to improve their English from basics to advanced English. Refer to the website: <https://www.talkenglish.com/>
- The Reading Writing Hotline (the Hotline) provides a national service for adults seeking English language, literacy and numeracy (LLN) information, advice and support. The Hotline provides information on:



- adult reading, writing and numeracy classes held locally across Australia or via correspondence
- becoming a literacy volunteer
- adult LLN teaching and learning resources
- Commonwealth-funded programs for Centrelink clients
- Commonwealth-funded English as an additional language programs for migrants
- Literacy and numeracy in the workplace for employers.

Refer to the website: <https://www.readingwritinghotline.edu.au> or phone 1300 6 555 06.

8.0 Relevant Legislative and Regulatory Documents

- Higher Education Standards Framework (Threshold Standards) 2021

9.0 Version Control History

Version	Date Approved	Approved By	Summary of Changes
1.0	22 Jul 2013	Approved (governance)	Initial publication of English Proficiency Policy.
2.0	27 Aug 2013	VET Advisory Board	Updated Staff and Support Options sections to include TAE competency (Address Adult LLN Skills).
3.0	10 Mar 2014	VET Advisory Board	Added IELTS 6.5 requirement for Nutritional Medicine and Complementary Medicine programs.
4.0	18 Nov 2014	VET Advisory Board	Terminology updated from EAL to ESL following VET Advisory Board feedback.
4.1	25 Nov 2014	National Compliance Manager	Inclusion of Cambridge English Scale scores.
4.2	4 Feb 2015	National Compliance Manager	Updated FCE and CAE score requirements.
4.3	3 Mar 2015	National Compliance Manager	Added reference to industry-specific English language requirements.
5.0	2 Jul 2015	National Compliance Manager	Split VET content into separate policy. Policy now applies to Higher Education only.
5.1	15 Oct 2015	CEO & DoE	Updated minimum IELTS requirement for staff to 7.0.
6.0	3 Nov 2016	Approved (governance)	Harmonised with Admissions Policy – Undergraduate (Domestic) and draft International Admissions & Enrolment Policy.
6.1	4 May 2017	National Compliance Manager	Broadened acceptable English language tests beyond IELTS.
6.2	17 Aug 2017	National Compliance Manager	Referred specifically to College-supplied BKSB test.
6.3	21 Aug 2017	National Compliance Manager	Added CMBA and NESA registration requirements.
6.4	Apr 2018	College Council	Extended English requirements to postgraduate degrees.
7.0	8 May 2019	National Compliance Manager	Updated to align with revised Admissions Policies.
7.1	14 May 2020	National Compliance Manager	Added English requirements for Undergraduate Certificate programs.
7.1	3 Jun 2020	National Compliance Manager	Rebranded template, structural alignment, governance update.



8.0	10 May 2021	National Compliance Manager	Substantive update for training and implementation purposes.
9.0	5 Sep 2022	National Compliance Manager	Added new courses and updated associated English requirements.
10.0	22 Apr 2024	College Council	Substantive update to align with Council feedback and benchmarking requirements, including revised English proficiency standards, AQF references, clarified evidence and course requirements, updated ESL registration and review processes, and minor amendments to course names, score requirements, and legislative referencing.
10.1	23 February 2026		Formatting updated. Website links updated. Referral pathway for student support updated.