

Policy Title: Language, Literacy and Numeracy (LLN) Policy and Procedure

Purpose

The purpose of this policy is to set out how Southern Cross Rail Training (SCRT) identifies, assesses and responds to the language, literacy and numeracy (LLN) needs of prospective and current students.

This policy is intended to ensure that students are enrolled in training that is appropriate to their skills and support needs, and that SCRT provides access to suitable support and reasonable adjustment where this is possible and permissible. Because many SCRT courses relate to rail safety work and safety critical activities, this policy also recognises that some courses have minimum communication and comprehension requirements that cannot be compromised.

Policy statement

SCRT is committed to identifying the LLN needs of students as early as possible, preferably before enrolment or before training commences, so that informed enrolment decisions can be made and appropriate support strategies can be implemented.

SCRT will provide students with access to support services or reasonable adjustment where appropriate, practicable and permitted within the training product, assessment requirements and rail industry regulatory expectations.

SCRT recognises that LLN support is part of learner support and progression, but also recognises that support cannot remove or dilute the competency requirements, safety requirements or English communication expectations that apply to rail industry training and assessment.

Where SCRT determines that a student does not currently have the LLN skills required to participate safely or successfully in a course, and the gap cannot be addressed through reasonable support or adjustment, SCRT may decline or defer enrolment and refer the student to specialist LLN support.

Scope

This policy applies to all nationally recognised and non-accredited training delivered by SCRT where LLN needs may affect a student's ability to participate in training, complete assessment, understand safety instructions or meet course outcomes.

This policy applies to all staff involved in marketing, enrolment, student support, training delivery, assessment, course development and training management.

Framework and definitions

Language, Literacy and Numeracy (LLN) refers to foundation skills that affect a student's ability to participate effectively in education, the workplace and everyday life.

SCRT recognises the five core skills described in the Australian Core Skills Framework:

- Learning
- Reading
- Writing
- Oral Communication
- Numeracy

For the purposes of this policy:

LLN support means assistance provided to a student to help them access training and assessment, without reducing the requirements of the training product or compromising valid assessment.

Reasonable adjustment means an adjustment to the way training or assessment is conducted that enables a student to participate on the same basis as others, provided the adjustment does not compromise the integrity of the assessment, workplace safety obligations or any regulatory or licensing requirement.

Safety critical course means a course or assessment activity where spoken or written English comprehension, numeracy, following instructions, hazard awareness, communication or other foundation skills are essential to safe performance and cannot be reduced below the required standard.

Principles

The following principles apply to this policy:

- LLN needs should be identified as early as possible.
- Students should receive clear information about LLN expectations before enrolment.
- Enrolment decisions must take account of whether the student has the foundation skills needed to participate safely and successfully.
- Support should be tailored to the student, the course and the workplace context where practicable.

- Reasonable adjustment may be provided where this does not change the required outcome, reduce the standard of competency, or breach regulatory or safety obligations.
- Rail industry regulatory requirements and safety critical communication standards must be upheld.
- Records of LLN assessment, support and decisions must be maintained.

Responsibilities

Training Manager

The Training Manager is responsible for overseeing implementation of this policy, approving LLN support strategies where required, reviewing more complex LLN matters, making decisions where suitability is unclear, and ensuring staff understand the limits of support and reasonable adjustment in safety critical training.

Trainers and Assessors

Trainers and assessors are responsible for:

- Identifying signs that a student may have LLN support needs.
- Using approved LLN assessment or screening processes.
- Discussing support needs respectfully and confidentially with students.
- Implementing approved support strategies and reasonable adjustments where allowed.
- Escalating concerns to the Training Manager where a student may be unsuitable for enrolment, continuation or assessment without further support.
- Ensuring assessment decisions remain valid, fair and consistent.

Administrative staff

Administrative staff are responsible for providing students with information about LLN expectations during enquiry and enrolment, supporting access to forms and processes, and referring concerns to trainers or the Training Manager.

Informing students about LLN requirements

SCRT will provide accurate and accessible information to prospective students about the LLN skills required for their chosen course, particularly where the course involves rail safety work, safety critical communications, workplace documentation, calculations, rules, procedures or licence-related requirements.

This information may be provided through the website, course brochures, enrolment forms, booking confirmations, direct discussions and the Student Handbook.

Students will be advised that some rail industry courses require English communication and comprehension skills at a level necessary for normal workplace communication and safety compliance, and that interpreters may not be permitted where this conflicts with industry or regulator requirements.

Identifying LLN needs

SCRT will seek to identify a student's LLN needs at or before enrolment wherever practicable.

- Identification of LLN needs may occur through one or more of the following:
- Initial enquiry and pre-enrolment discussions.
- Completion of online or paper-based enquiry and enrolment forms.
- Review of prior qualifications, licences or evidence of previous study.
- Observation of the student's ability to read, write, communicate, navigate instructions and complete simple course-related tasks.
- An approved LLN assessment, aptitude test or screening activity.
- Direct discussion with the student about prior learning support needs, disability, condition or learning difficulties.

Where an LLN issue is not identified until after training has commenced, the trainer or assessor must review the student's needs promptly and refer the matter to the Training Manager where support, adjustment, deferral or referral may be required.

Evidence that may indicate LLN suitability

A student may already demonstrate suitable foundation skills for some short courses where they hold relevant and current evidence such as:

- A current RIW-related credential or licence.
- A current Certificate III or higher qualification in a relevant trade or industry area.
- A current Protection Officer Licence.
- Another qualification or work history that reasonably demonstrates comparable workplace English and numeracy capability.

Such evidence may support an enrolment decision but does not automatically remove SCRT's responsibility to consider whether the student can meet the LLN demands of the specific course.

Assessment of LLN needs

SCRT may use an approved LLN assessment tool, aptitude test, contextualised screening task, interview, observation or a combination of these methods to assess a student's LLN needs.

Where possible, LLN assessment processes should relate to the real language, literacy and numeracy demands of the course and the workplace tasks the student will be expected to perform.

For rail industry and safety critical training, this may include the student's ability to:

- Read and understand written instructions, forms, procedures and safety information.
- Understand and respond to verbal instructions in English.
- Communicate clearly and accurately in English.
- Complete written responses or workplace documentation.
- Perform relevant calculations involving time, distance, sequence, quantities or measurements.
- Follow directions and respond appropriately in safety-sensitive contexts.

Support strategies

Where a student has a minor or manageable LLN gap and is otherwise suitable to undertake the course, SCRT may provide or arrange support strategies, provided these are reasonable and do not compromise safety or the integrity of assessment.

Support strategies may include:

- Explaining course requirements clearly before commencement.
- Speaking clearly and at an appropriate pace.
- Repeating or rephrasing instructions.
- Checking understanding by asking the student to explain content in their own words.
- Providing additional supervised practice opportunities.
- Allowing extra time for some learning or assessment activities where appropriate.
- Providing additional learner support sessions or tutorial guidance.
- Using an approved scribe or reader where this is appropriate, permissible and does not invalidate the assessment.
- Referring the student to external LLN support services.

Support provided must be documented where it affects training delivery, assessment conditions or enrolment decisions.

Rail industry and safety critical limitations

SCRT delivers training in a rail industry environment where communication, reading, following instructions, situational awareness and numeracy can be safety critical.

For this reason, some forms of support or adjustment may not be appropriate, and some students may not be suitable to enrol or continue in a particular course if they cannot meet the required standard of communication, comprehension or numeracy.

SCRT must not provide support or adjustment that:

- Removes the need for the student to demonstrate the required competency.
- Compromises the validity, reliability or fairness of assessment.
- Breaches unit of competency requirements.
- Conflicts with rail industry rules, regulator requirements, licensing conditions or workplace safety obligations.
- Introduces an unacceptable safety risk.

Reasonable adjustment

Students with disability, medical conditions, learning difficulties or other support needs may be eligible for reasonable adjustment to participate in training and assessment on the same basis as others.

Reasonable adjustment will be considered on a case-by-case basis and must balance the student's needs with the requirements of the training product, the assessment method, workplace expectations and safety obligations.

Examples of reasonable adjustment may include:

- Use of a scribe for a student who can demonstrate knowledge orally but has a specific writing difficulty, where this does not invalidate the assessment.
- Verbal clarification of instructions.
- Clear pacing of spoken delivery.
- Additional reading time.
- Modified formatting such as larger print or improved spacing.
- Additional monitoring of understanding during training.

Reasonable adjustment will not be used to exempt a student from demonstrating required knowledge, reading, writing, oral communication or numeracy outcomes where those skills are an inherent requirement of the unit, course or workplace role.

Referral to specialist support

Where SCRT determines that a student requires LLN development beyond the support SCRT can reasonably provide, the student may be referred to an external specialist provider such as TAFE, community language and literacy services, foundation skills programs, adult education services or another suitable organisation.

Where a student is not currently suitable to undertake the course due to LLN needs, SCRT will explain the reasons respectfully, document the decision, and where practicable provide referral information for further assistance.

Where appropriate under SCRT's Fees, Charges, Refunds and Cancellation Policy, the student may be offered a refund, transfer or credit for later participation.

Access and Equity

SCRT is committed to fair access and equitable treatment of students.

This commitment includes identifying support needs early, discussing support confidentially, considering reasonable adjustment, and making decisions based on both learner needs and genuine course or safety requirements.

Access and equity does not require SCRT to enrol or continue a student in training where the student cannot currently meet essential safety, communication or competency requirements, even with reasonable support.

Procedure

Pre-enrolment and enrolment

The student makes an enquiry through the website, by phone, by email or in person.

SCRT provides information about the course, including any relevant LLN expectations and the safety critical nature of rail industry training where applicable.

The student completes the enquiry or enrolment process.

SCRT reviews the information provided and identifies whether there are any indications of LLN support needs.

Where required, the student completes an approved LLN assessment or screening activity before enrolment is finalised or before training commences.

SCRT determines whether the student:

- Is suitable to enrol without additional support.
- Is suitable to enrol with identified support or reasonable adjustment.
- Requires further review by the Training Manager.
- Should be referred to specialist LLN support before enrolment or continuation.

During training

The trainer or assessor monitors student participation, comprehension, communication and ability to complete learning and assessment tasks.

If LLN concerns arise, the trainer or assessor discusses the issue with the student respectfully and confidentially.

The trainer or assessor documents the concern and implements minor approved support strategies where appropriate.

If the issue is significant, ongoing or affects safety, assessment validity or course progression, the matter is escalated to the Training Manager.

The Training Manager determines whether the student can continue with support, requires reasonable adjustment, should be deferred, or should be referred externally.

Decision Making

A decision about a student's LLN suitability must consider:

- The LLN demands of the course and assessment.
- Any safety critical requirements.
- The student's existing skill evidence.
- The results of any LLN assessment or screening.
- Whether appropriate support or reasonable adjustment can be provided.
- Whether the student can still demonstrate competency and meet industry expectations.

Referral and outcome

Where the student is referred for specialist LLN support, SCRT will record the referral and explain any options for future enrolment, refund, transfer or credit in accordance with other SCRT policies.

Where the student disagrees with an LLN-related decision, they may access SCRT's Complaints and Appeals Policy and Procedure.

Indicators in the enrolment journey

SCRT may use the enrolment journey as part of its broader LLN observations. Examples include whether the student can:

- Access and navigate the website or online information.
- Follow directions to the training location.
- Listen to and interpret housekeeping or course information.
- Complete an enrolment form.
- Interpret instructions about fees and payment.
- Participate in discussion in English.
- Complete simple calculations relevant to time, distance, sequence or fees.

These observations may contribute to identifying support needs but should not be the sole basis for a high-stakes LLN decision where further assessment is required.

Staff capability and review

SCRT will make relevant professional development opportunities, guidance material and updates available to managers, trainers, assessors and administrative staff so they remain aware of LLN obligations, support strategies, assessment validity and the limits of reasonable adjustment in safety critical settings.

SCRT will review LLN processes, tools and outcomes periodically to ensure they remain fit for purpose and consistent with current standards, course requirements and industry expectations.

Records Management

SCRT will maintain records of:

- LLN information provided to students.
- LLN screening or assessment completed.
- Decisions about suitability, support or referral.
- Reasonable adjustments approved.
- Support strategies implemented.
- Communication with the student regarding LLN needs.

Records must be stored securely and handled confidentially in accordance with SCRT recordkeeping and privacy requirements.

Related Documents

- Student Handbook
- Enrolment Procedure
- Access and Equity Policy
- Reasonable Adjustment Policy or Procedure
- LLN Assessment Tool / Aptitude Test
- Assessment Policy and Procedure
- Fees, Charges, Refunds and Cancellation Policy
- Complaints and Appeals Policy and Procedure