

# Language, Literacy and Numeracy (LLN) Policy and Procedure

## 1. Purpose

This Policy outlines the comprehensive process that City College will undertake in identifying, supporting and appropriately addressing the needs of students who are enrolled in courses at City College and who may have issues or concerns regarding their language, literacy and numeracy skills and abilities.

## 2. Related Documents

- Intervention Strategy Policy and Procedures
- International Student Handbook
- Student Course Progress Monitoring Policy and Procedures
- Complaints and Appeals Policy and Procedures
- Student Orientation Policy

## 3. Related Legislation

- Education Services for Overseas Students (ESOS) Act 2000
- The National Code, 2018
- NVR Act 2011
- The Standards for RTO's, 2015
- National Reporting System (NRS) Test Benchmarks for Educational Function Levels (EFL)

## 4. Scope

This Policy and Procedures apply to all City College students enrolled in a course of study at City College, as well as to all City College staff and trainers responsible for providing students with the necessary, relevant, and appropriate support along with services required to help them achieve their academic and career goals during their time at the College.

## 5. Responsibility

- 5.1** It is the responsibility of the administrative staff to respond to student inquiries, while trainers serve as the first point of contact for students. If a student's inquiry or need exceeds the trainer's scope of training, knowledge, or experience, the trainer must seek guidance from their line manager or the CEO.
- 5.2** Admin Staff must update the Student Management System for each enquiry and ensure all documentation is filed on the students' file.
- 5.3** Admin Staff must ensure that any written response to a student enquiry is generated from the Student Services, so it has a contact log and a copy of the information sent. No verbal outcomes are to be an acceptable practice by City College staff.
- 5.4** The responsibility for briefing all staff on their obligations under the ESOS Framework, the National Code 2018, and the SRT0 2015, as well as their implications for students, lies with the CEO and the English/LLN team.
- 5.5** Day to day responsibility for the oversight and management of student welfare support services lies with the Supervisor, Student Services.
- 5.6** The CEO has overall responsibility for this Policy and the ensuing Procedures.
- 5.7** The CEO is responsible for the day-to-day management, implementation, and maintenance of this Policy and its Procedures, with the administrative staff reporting directly to them.
- 5.8** The CEO is responsible for ensuring that all staff members and trainers who interact directly with overseas

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students are fully informed about the ESOS framework, particularly the provider's obligations under it.

## 6. Definitions

|                              |   |
|------------------------------|---|
| ASCF                         | Australian Core Skills Framework.   |
| English/LLN CEO              | City College has a fully qualified and experienced English and LLN teacher/Trainer – who is responsible for overseeing the effective management of our students English /LLN proficiency and the City College relevant support and services available to our students – as/when required.   |
| LLN                          | Language, Literacy and Numeracy   |
| City College Student         | is an individual person who is formally enrolled to study at City College. This person is the same as that who appears on the City College enrolment documentation including: the enrolment application, the signed Student Acceptance Agreement, all agreed payment plans and payment documentation and receipts, and who City College has issued the CoE to.  |
| Student Support and Services | City College has a number of Admin Staff members, Academic staff and Trainers and CEOs employed and specifically available to provide our international students with relevant, sufficient and appropriate support and services throughout their enrolment and studies with City College – this includes support with academic studies, English/LLN and living in Australia, which may include support provided internally by City College or via a referral to a suitable external provider – at no additional costs to the student wherever possible and/or applicable. |

## 7. Policy Provisions

- 7.1** All courses offered by City College are delivered exclusively in English. Therefore, it is essential for students enrolling at City College to possess the necessary English language skills, along with the required literacy and numeracy competencies. These skills must be sufficient to successfully undertake and complete the assigned learning and assessment activities at the required Vocational Education and Training (VET) level, as outlined in the Australian Qualifications Framework (AQF) and detailed in the relevant Training Package for their enrolled course.
- 7.2** City College ensures that its trainers and assessors possess the necessary LLN (Language, Literacy, and Numeracy) skills to effectively communicate course content to students. The college provides comprehensive information to prospective students and staff during pre-enrolment and enrolment processes. This information is included in the International Student Handbook, the Pre-Departure Handbook, and specifically addressed during the compulsory Orientation Session. During Orientation, students also participate in English/LLN assessment activities. These activities help identify any language, literacy, or numeracy challenges, ensuring that suitable and relevant support measures are provided to students who self-identify or are identified as needing assistance.
- 7.3** City College understands that newly enrolled student's language, literacy and numeracy skills must not be assumed by staff and trainers upon the student having successfully completed the initial enrolment and admissions process, and that students who have self-identify or those who may have been subsequently identified by City College staff/trainer as having a language, literacy or numeracy concern may be asked to attend a support meeting with the English/LLN CEO and may then be referred to an appraisal session with an external organisation.

### 7.4 ENGLISH PROFICIENCY REQUIREMENTS AND SUPPORT

#### 7.4.1 Students:

- 7.4.1.1 Students who identify with English as a Second Language (ESL) or who demonstrate difficulty with the English language during their course admission/enrolment process or

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studies should contact the Supervisor, Student Services or a Student Services Officer to inform them of their difficulties. The Admin Staff can then advise the student of the possible support programs and/or activities that are available to assist them to be able to equally participate in life as an International student, and in their scheduled course study requirements.

- 7.4.1.2 Individuals applying to enrol in a City College VET course who identify as ESL (English as a Second Language) must provide evidence of their English proficiency. This includes an academic IELTS score of 6.0 for Certificate III, IV, Diploma and Advanced Diploma courses (or equivalent scores from other recognized tests). These requirements are set to ensure that students have the necessary English language skills to successfully engage in their studies and excel in their chosen vocation upon completing their course.
- 7.4.1.3 City College reserves the right to determine IELTS scores required for specific courses based on the Industry requirements and recommendation, our own industry consultation feedback, and from the professional body and / or professional association requirements.
- 7.4.1.4 At the discretion of City College, prospective international students who demonstrate difficulty with English language during their course application process, level three countries based on immigration criteria <https://immi.homeaffairs.gov.au/visas/web-evidentiary-tool> and/or the Scheduled College Orientation Session – specifically the English/LLN assessment/activities conducted may be required to undertake a full assessment of English language at their own cost and achieve a result at least equivalent to the following:
  - IELTS band score of 6.0 overall (For Certificate III and IV qualifications)
  - IELTS band score of 6.0 overall (For Diploma and Advanced Diploma qualification)
  - OR equivalent internationally recognised exam results in line with the DoHA (Department of Home Affairs) regulations.
- 7.4.1.5 City College will verify the provided IELTS and PTE certificates. English test results must be no more than two (2) years old.
- 7.4.1.6 Students who are identified as not meeting the required English proficiency level, despite completing the initial enrolment process and providing the necessary evidence of the required scores, may be required to undergo an additional test at their own cost

#### **7.4.2 TRAINING STAFF**

- 7.4.2.1 It is a condition of employment at City College for all VET Trainers and Assessors to hold the relevant TAE40116 Certificate IV in Training and Assessment as stated in the Standards for RTO's 2015 which includes the requirement to hold the unit of competency - Address adult language, literacy and numeracy skills (TAELLN411).
- 7.4.2.2 In addition, City College Trainers and Assessors are also required to have the ability to successfully impart knowledge to students at the appropriate level through all forms of communication. At the discretion of the College, prospective and current Trainers / Assessors who demonstrate difficulty with English language may be required to undertake an assessment of their English language proficiency at their own expense.

#### **7.4.3 SUPPORT OPTIONS**

- 7.4.3.1 City College provides English language assistance to all enrolled students, including those for whom English is the first language. A range of support options are available to students, which may include the following:
  - Pairing the student with a study mentor or buddy who demonstrates well-developed English language skills.
  - Additional self-study activities.

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- One-on-one tutoring with a trainer, assessor, or English/LLN specialist.
- 7.4.3.2 The City College CEO, English/LLN is qualified and responsible for overseeing the management, coordination, and processes within City College for English and LLN proficiency requirements for both enrolled students and our staff.
- 7.4.3.3 If a tutor or buddy with the necessary expertise and resources to provide assistance is unavailable, the CEO, English/LLN, will refer the student to a local language support service or an external specialist. Students are expected to cover any costs associated with accessing external English language support.
- 7.4.3.4 City College acknowledges its responsibility to support its students with LLN difficulties within the scale and scope of its operations. Consequently, our Trainers, Assessors and staff are encouraged to use direct or indirect strategies to assist students experiencing difficulties and register the student as 'At Risk' using the Student Observation Report with Student support staff proposing they may need to follow up and further assistance provided where required.
- 7.4.3.5 All our trainers and/or assessors have the requisite knowledge to address LLN skills as required by the Certificate IV in Training and Assessment qualification specifically, the unit of competency - Address adult language, literacy and numeracy skills (TAELLN411).
- 7.4.3.6 Students will undertake LLN assessment to meet entry requirements, the following levels must be met (dependent on course of study):
- **Certificate III** - Achievement of competency in Exit Level 3 score and working at Level 4 within the Australian Core Skills Framework assessments in Literacy and Numeracy.
  - **Certificate IV** - Achievement of competency in Exit Level 3 score and working at Level 4 within the Australian Core Skills Framework assessments in Literacy and Numeracy.
  - **Diploma** - Achievement of competency in Exit Level 3 score and working at Level 4 within the Australian Core Skills Framework assessments in Literacy and Numeracy.
  - **Advanced Diploma** - Achievement of competency in Exit Level 3 score and working at Level 4 within the Australian Core Skills Framework assessments in Literacy and Numeracy
- 7.4.3.7 Below is the list of key online opportunities which contain sufficient information for LLN support:
- **Reading Writing Hotline** - this organisation has been around for many years, and their website has some great resources to improve reading and writing.  
<https://readingwritinghotline.edu.au/information-and-advice/>
    - **Telephone:** 1300 6 555 06
    - **Postal address:** Reading Writing Hotline c/-TAFENSW Ultimo Campus, P.O. Box 707, Broadway, 2007.
  - **Adult Reading and Writing Apps** - apps are small programs, such as games, for your smart phone or tablet. This site provides information about free or paid apps that support literacy. Some apps read text out loud for people who have trouble reading, and some apps help with taking notes.
  - **Using Microsoft Word to translate text into another language** - this link shows how you can use Word to translate documents into other languages. Student will have access to the qualified LLN vocational trainer and assessor for additional training and LLN support

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## 7.5 LANGUAGE, LITERACY & NUMERACY STRATEGIES

**7.5.1** The City College English and LLN Strategy recommends individual and group support to enhance learning for students. The following strategies are implemented:

7.5.1.1 Enrolled students to undertake a pre-commencement English/LLN Test during each scheduled College Orientation session via LLN Robot <https://www.llnrobot.com.au/>

7.5.1.2 Student will receive online access to the test.

7.5.1.3 The LLN Robot online system will assess the test and provide a detailed report to City College.

7.5.1.4 City College will analyze the results and communicate the findings to both the student and the trainer.

7.5.1.5 Modifying learning materials, where appropriate, to support student needs without compromising the integrity of the assessment.

7.5.1.6 After receiving support from a City College TAE (LLN) qualified trainer, students may be referred to external agencies (e.g., TAFE) for additional literacy and numeracy courses, if needed.

7.5.1.7 Providing flexibility in learning and assessments delivery modes, scheduling and access to student support services.

7.5.1.8 Access to 'Study Skills' support sessions.

7.5.1.9 One-on-one tutoring if appropriate.

7.5.1.10 City College employs a variety of teaching and learning strategies, including verbal explanations, diagrams and charts, group presentations, demonstrations, the incorporation of workplace materials, modelling, and activities. These strategies are designed to accommodate the diverse learning styles and requirements of students.

## 7.6 LLN ASSESSMENT/CHECKS

**7.6.1** Whilst LLN Robot online testing for students is not mandatory under the Australian Qualifications Framework (AQF), City College has made provision for an LLN check (assessment) to be undertaken with students as part of the colleges compulsory students scheduled orientation session conducted within the prior to their course commencement at City College. The College reserves the right to determine how and to whom the assessment is provided. The following points should be noted:

7.6.1.1 Our experienced and qualified teachers, trainers, and assessors understand which content and curriculum may be challenging for students and are aware of the specific skills required to support them effectively.

7.6.1.2 Our teachers, trainers, and assessors are expected to identify "at risk" students based on the LLN Robot test report and are responsible for referring these students to the CEO, English/LLN via Student Services for appropriate follow-up and intervention.

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7.6.1.3 Students may indicate or self-disclose their LLN requirements and will be supported accordingly. If English is a Second Language (ESL), they will be referred to an appropriate program, where applicable.

7.6.1.4 Students may ask for additional support during their course.

**7.6.2** Assessment of LLN skills and competencies can also be conducted as part of a formal assessment against a training package competency.

## 8. Policy Information

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|---|---|
| Authorised Officer  | CEO   |
| Supporting documents, procedures and forms of this policy | Intervention Strategy Policy and Procedures<br>Equity and Access Policy<br>International Student Handbook<br>Student Course Progress Monitoring Policy and Procedures<br>Complaints and Appeals Policy and Procedures<br>Student Orientation Policy |
| Related Legislation and Codes of Practice                 | Education Services for Overseas Students (ESOS) Act 2000<br>The National Code, 2018<br>NVR Act 2011<br>The Standards for RTO's, 2015<br>National Reporting System (NRS) Test Benchmarks for Educational Function Levels (EFL)                       |
| Audience  | Public  |

## 9. Procedure

**9.1** City College has implemented three key methods to identify, support, refer and /or monitor and manage the processes for prospective students English/LLN proficiency requirements:

**9.1.1** Review and check prospective students' evidence and documentation for English language and academic proficiency levels and skills throughout the recruitment and enrolment processes. This includes conducting an English/LLN assessment activity for all enrolled students during the scheduled orientation sessions to identify any relevant support requirements.

**9.1.2** Effectively support and refer identified students to appropriate support resources and further testing/assessment as required.

**9.1.3** Monitor and provide ongoing support for students who are enrolled provisionally under "at risk" status.

### 9.2 PROCEDURAL STEPS:

**9.2.1** Prospective students self-identify their needs during the enrolment application process.

9.2.1.1 Students may indicate or self-disclose their LLN requirements and will be supported and where applicable referred to an appropriate program- if English is a Second Language (ESL).

9.2.1.2 Students may ask for additional support during their course.

**9.2.2** Enrolled students who indicated they have not completed their secondary school certificate of any other tertiary level qualification.

**9.2.3** These students are issued the City College LLN assessment for completion, returning and marking

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- by the qualified CEO, and/or a nominated qualified trainer or student support staff member PRIOR to the student being issued with an e-CoE by City College.
- 9.2.4** Enrolled students attending their compulsory scheduled Orientation session – and prior to their course commencement date.
- 9.2.4.1 Students are to undertake the City College English and LLN check (assessment) activity - prior to their course commencement at City College.
- 9.2.4.2 Students results are compared to LLN entry requirements for the applicable course of study (results are then attached to the student’s record/file).
- 9.2.4.3 Students who do not meet the required LLN entry level may be provisionally enrolled in single subject (up to two units of competency) at the discretion of the CEO, English/LLN and operations manager, student support staff.
- 9.2.5** The CEO, English/LLN, Trainers and/or Assessors, and the student support staff are expected to identify Students “At Risk” using the Student Observation Report (SOR) and help in referring such students to the CEO via Student support staff for further assistance and/or further intervention and/or possible referral action.
- 9.2.6** Provisionally enrolled students are marked as status “at risk” in the student management system including:
- 9.2.6.1 The student’s assigned trainer is informed of the student’s status and LLN results and tasked to provide the relevant support and monitoring of the student’s progress and performance.
- 9.2.6.2 If the “at risk” student achieves competency in the provisionally enrolled unit/s of competency, they will be approved to progress into their unconditional enrolment within their enrolled course/s of study at City College.
- 9.2.6.3 Students who are unable to achieve competency in the assigned provisionally enrolled unit(s) will have their relevant trainer notify student support staff via a new SOR. The student will not be permitted to progress to another unit of competency within their course until the CEO and/or student support officer conduct an intervention meeting. During this meeting, the student will be referred to additional LLN resources or an external support organization.
- 9.2.6.4 Students in this circumstance may re-apply to enrol and may be required to undertake another English/LLN assessment/check at that time.
- 9.2.7** City College is committed to supporting students and will not discriminate against entry for students based only upon their LLN check/assessment outcome/s. If LLN levels are deemed unsuitable for the intended course of study, the CEO and student support officer will provide the necessary information and referrals, advising the student on where to obtain the required support and/or assistance

### **9.3 PRE-ENROLMENT/ORIENTATION**

- 9.3.1** During the students scheduled orientation session – and prior to commencement of their enrolled course, the Admin Staff will provide the new students with information about the training/teaching and learning environment and seek to gain an insight into the learning styles and language preferences of the students. The College uses this information to help make informed choices about the students’ capacity to meet the course requirements and to ascertain if additional support is required. The CEO and student support officer will discuss relevant student’s LLN capabilities and may recommend an external assessment occur before they

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commence their scheduled and enrolled course. At this time, any persons who have concerns are encouraged to discuss these as soon as possible with their Trainer, the CEO or Admin Staff.

Revision History

| Version No     | Approval Date & Review Date | Comment                      | Reviewed/Approved By |
|----------------|-----------------------------|------------------------------|----------------------|
| ADM_PP_03_V.01 | August 2024                 | Policy and Procedure Created | CEO                  |
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