Response to 'Language, Literacy and Numeracy requirements in the *Standards for Registered Training Organisations*'

This response is written (at very short notice) from Batchelor Institute. Its intention is to sketch our perception of proposals in *Standards for Registered Training Organisations* (herein '*LLN for SRTO*s') and the likely impacts of the proposals for Indigenous peoples especially across the Top End. It tries to bring to awareness the fact that policies that seem transparent and socially progressive in mainstream contexts can have all sorts of paradoxical and detrimental effects for marginal social groups and non-mainstream work contexts. Unfortunately, because of shortness of time, this text has not itself been negotiated in a culturally appropriate way across the range of contexts and peoples for whom it ventures to speak.

Section 1 focuses on the underpinning framing of LLN and its relation to Indigenous realities especially across the Top End.

Section 2 focuses on more procedural matters in 'LLN for SRTOs'.

Australia as a multicultural & multilingual continent

By failing to make explicit reference to the cultural and linguistic diversity of Australia, *'LLN in SRTO'* wittingly or unwittingly, insinuates a monocultural and monolingual normativity and is therefore assimilationist. By not explicitly mentioning or describing the full range of work sites, workplaces that lie on the margins such as Indigenous workplaces become invisible and are subjected to a framing that amounts to a violent and colonial imposition of an alien culture and linguistic framework, while monocultural and monolingual workplace are privileged. For example, if we think of how the document frames the work of the Maningrida community store or of the health clinic at Minjilang—and this is the constituency that Batchelor Institute services—the document takes on a different colouring from its look when viewed from an urban context. The unspoken privileging of English as the medium of workplace competence and communication looks ridiculous.

From the point of view of such Indigenous worksites in the Northern Territory (and probably more widely), the main message of *'LLN in SRTO'* is that the Australian Training System does not feel responsible for helping to address the tragic loss of Indigenous languages nor for fostering the cultural life of Indigenous peoples in Australia. Implicitly the document suggests that if 'individuals' abandon their existing community, family, cultural or language identities and commitments, then they can join the 'real' mainstream workforce thanks to the assistance of LLN.

Equity does not only mean access it also means inclusion

Thus the document frames LLN purely in terms of *access* to a monolingual mainstream. There is no acknowledgement let alone espousal of the cultural and lingual diversity of LLN, of the fact that there are literacies, not a single literacy, languages, not a single language and numeracies, not a single numeracy, and that these realities must be acknowledged and included our sense of Australia and its worlds of work. Although the phrase 'English language, literacy and numeracy' is used only once in the document, this is because the document simply assumes that everyone already knows and agrees that the language of Australian workplaces is English. Thus these other languages, literacies and numeracies are excluded by being rendered invisible.

Whereas there is now a broad concern to make workplaces more 'family-friendly', there seems to be little effort in *'LLN in SRTO'* to make workplaces or workplace training more 'culture friendly' or 'language friendly'. Thus, although there is one mention of 'human rights law', this reference is not spelled out in terms of developments in international human rights law, an primary arena within which Indigenous peoples have been able to formulate their own integral indigenous social, educational, language and cultural rights over and above their civil and individual rights.

Indigenous people wish to learn English

Indigenous parents and leaders have always insisted on the vital importance of learning of English language and the forms of living and knowing embodied in it. However, they have also insisted that this not be achieved at the expense of maintaining and renewing Indigenous languages, cultures and ways of being. English LLN must be learnt 'additively' not 'subtractively', otherwise

the exercise is simply a colonial and assimilationist exercise, not a genuine recognition and valuing of the lingual and sociocultural diversity of Australian life. From time immemorial Aboriginal and Torres Strait Islanders have known how to live in multilingual, multicultural worlds. Pre-colonially the Australian continent was never subjected to nationalist aspirations positing a single nation, one people, one State or one language and culture.

Indigenous peoples wish to understand their neighbours

Australian Indigenous peoples have been living multilingual and multicultural lives from time immemorial. Aboriginal people have always 'married out', have always learnt the languages of mothers, fathers, uncles, aunties, husbands and wives – as well as any local languages or lingua francas as needed. To develop kinship relations with others from adjacent 'country' is normal (whether the neighbours be Indigenous, Macassan, Afgan, Chinese, Kanak, English, Yugoslav, Irish, Scotch, German, French, or Japanese). Aboriginal students attending Batchelor Institute from Top End or Torres Strait communities typically speak and understand 4 or 5 languages—two or three traditional Indigenous languages, a Kriol/Creole, Aboriginal English and some standard English.

For Indigenous people from the more remote communities, this is how the language of English is treated. It is the language of neighbours and therefore should be learnt in order to ensure good and fruitful relations. On this interpretation, English is not a national meta-language mandated by a colonial State claiming governance of the entire continent and all its localities; rather, it is the language of a new group who have not yet found their 'place' within the mosaic of languages and cultures that is Australia. From this point of view the exclusive attention to English in the *'LLN for SRTOs'* seems absurdly myopic and self-centred in its refusal to acknowledge and support the reality and presence of other languages and cultures within Australia.

Indigenous people wish to determine their own future

It is important for mainstream policy advocates to understand that Indigenous peoples, in the Top End especially, do not consider themselves to be 'living on the margins'. They are living social lives that are continuous with substantive and self-sustaining cultures and social institutions that have formed the contours of social life and the horizons of the meaningful world from time immemorial. In the words of Yothu Yindi they are 'living in the mainstream'. Technologies such as Toyotas, guns, grog, European diseases, guitars, country music, Australian Rules, TV, modern medicine and mobile phones have been resisted, integrated and appropriated in ways that enable Indigenous life to continue and survive against all odds.

Indigenous people are becoming more confident that 'they have survived', that their culture will survive in some form or other, and that, if a serious effort is made, that many of their languages might also survive. For Indigenous peoples the right to the dignity, self-respect and empowerment of self-determination, of forging a self-chosen future grounded in Indigenous forms of decision-making and autonomy forms the fundament within which any consideration of VET training and/or LLN must situate itself. Any offer of work, of training, of education, of literacy or language education, of English literacy or English language must be framed within this historic project of self-determination and decolonisation.

Education and Training must have real (not 'imaginary') outcomes for social justice and livelihood

Without an explicit framing of LLN in VET in terms of the socio-linguo-cultural life-worlds of Indigenous peoples and the right to self-determination of these life-worlds, the offer of LLN will continue to be resisted by Indigenous people. For Indigenous peoples, LLN is two edged: it pretends to offer hope, work, employment, status, power, dignity and a future but in actual fact mostly delivers despair, unemployment, indignities, powerlessness, victimhood, confusion, loss of standing and connection with family, kin and country, loss of identity, loss of language, culture, community and hope and as the crowning blow—a HECS debt!—though VET is not, or not yet, implicated in creating financial debt for Indigenous students.

For Indigenous adults to put aside their fear, scepticism and the painful memories of earlier dealings with mainstream service providers and government agencies inevitably mobilises both their deepest fears of loss of self and community and their deepest hopes for themselves, for their children, for their grandchildren, for the future. To raise hopes but not address them adequately,

given the Australian State's history of dealings with Indigenous peoples would be profoundly evil. Given the crucial role of education and training as a point of leverage in assisting Indigenous peoples pursue their aspirations, to offer a form of education and training that sets them up to fail would mean that VET, and in particular VET as inflected by the discourses and practices of LLN, would be deepening the cynicism, resignation and demoralisation of Indigenous peoples.

In this way LLN will have simply continued its historic myopia, its unthinking ideological attachment to modernity and progress, whereby it can offer those subsisting outside the First World 'access' to the riches of employment, housing , mobility, health, security, leisure, a serious secondary education for their children and a future for their grandchildren, and all the element s of a decent social life. Thus the 'dark side of LLN' from LLN's past still seems to have infect this document.

Indigenous people want to participate in the institutions, practices, discourses and registers of governance, culture, scholarship, vocational and professional life

Most Indigenous peoples need 'second chance education' in order to realise their aspirations

The childhood schooling of almost all Indigenous students is deficient. According to the latest MAP findings, 2% of Grade 3 students in remote Indigenous community schools have attained a score appropriate to their age. The number of Batchelor Institute higher education students who were enrolled with a TER score could be numbered on one hand.

Especially for adults who have not been offered serious secondary schooling (or were offered it in a colonial and alien format from which they instinctively shrank and sceptically resisted) the offer of a 'second chance' is a serious matter.

CBT and the English textualisation of Indigenous work

As a result of the re-working of the Kangan TAFE system into VET system, particularly in the Northern Territory LLN as ACE (as ALBE and general education) has been almost wiped out, especially for Indigenous adults. This has meant that, increasingly, the only education or training available to Indigenous adults is VET. Initially VET was 'sold' to Indigenous people on the grounds that it would recognise their existing situated workplace competence irrespective of their mastery of the more abstract language and knowledge delivered by formal schooling and tertiary education. Many Indigenous workers had learnt their workplace skills, knowledge and the language of workplace on the job over (often) decades of faithful service. To finally have this extensive and intensive experience and ability to perform in the most complex, paradoxical and intractable workplaces in Australia recognised seemed only justice.

Thus a competency-based system of education and training promised to recognise an equivalence between dealing with a medical crisis in a remote community and dealing with the same crisis in a large city even though the underpinning knowledge, skill and languages mobilised are quite different; or orchestrating an agreement between different interest groups to achieve a common purpose, whether this is achieved through the mobilisation of kinship or through the structures of a rationalised institution. In other words, the same competency or outcome which can result from the mobilisation of a wide range of underpinning 'inputs' or situated socio-cultural resources.

Competence and underpinning LLN

However this offer of RPL or RCC has been queered by re-framing worksites as sites subject to elaborate English texts of governance and training. Thus the face-to-face situated learning, cogent speech and knowledgeable activity of the Indigenous workplace in a remote community has now been subsumed into a veritable web of written English instruction, imperative and documentation. This imposition of English textual governance on workplaces may damages many small 'ethnic' worksites, but it is especially damaging to Indigenous workplaces in remote communities. By trying to impose an abstract generic register of written or spoken English as the dominant register and language for framing workplaces in remote communities, the sense of competence, reality, social relationships, and identity of Indigenous workers is undermined—yet again.

Even worse VET Training Packages and the LLN that is 'unambiguously' (sic) embedded in the competencies are designed around large Fordist urban English-speaking workplaces, not small remote community workplaces where a new 'Whitefella' despite having all the competencies of their field under their belt is still as helpless as a baby. Even the simplest task or act of communication seems mysterious and unachievable. To locate someone to ask them to attend a clinic appointment; to ready a 4WD for a trip; to send a fax: all these are simple and straightforward tasks in the city; in a remote community however they are not. Of course for Indigenous workers from that place, they are simple; but for a Whitefella not from that place, they are almost impossible to achieve—without assistance from local Indigenous workers. Yet this difference of workplace and difference of the underpinning knowledge and skills is not acknowledged.

Insitu competence and differences of underpinning resources

The concept of competence was intended to wrench 'skill' away from a atomist behavourist training format, and locate skill back in the workplace as a holistic *insitu* capacity. This specification of competence as 'workplace performance' separate from 'learning objective' means that competence as 'output' can be stated independently of 'inputs' which in turn means that different inputs can be required for the same output. To perform an action in one workplace requires different underpinning cultural knowledge and skills, and language and literacy skills from another. Cleaning a wound in a Melbourne hospital is successfully performed by drawing on a archive of underpinning resources (of knowledge, culture, language, literacy, technologies) that overlaps quite minimally with the archive drawn on to clean the same wound in the clinic at Papunyu. Perhaps the only thing in common would be the bandages!

Just how common the underpinning knowledge is, whether it forms a pattern of close family resemblance or a more dispersed pattern is a matter for empirical research, research that has never been carried out. Instead levels of LLN are specified in a speculative manner without any validation against the actual LLN deployed across the full range of Australian worksites. It is simply assumed that 'cleaning a wound' in Melbourne and Papunya implicates the same LLN.

This is not true. The LLN underpinning a competence is not 'unambiguously' specified in the statement of competence. The same competence can rest on quite disparate underpinning resources, a fact quickly learnt by those 'whitefellas' working in remote Indigenous communities and their workplaces, as noted earlier. The claim that identical resources underpin a competence rests on a simplification of range of worksites. It simply imposes a dominant monocultural paradigm on the diverse workplaces of Australia and refuses to recognise the true cultural and linguistic diversity.

Much Indigenous work takes place outside workplaces, Indigenous or non-Indigenous

However the diversity of work contexts and their required underpinning cultural, cognitive, linguistic and social resources reaches beyond the differences between Indigenous workplaces on remote communities and urban workplaces. Because the work of remote communities has not been subject to a strong division of labour or commodification, most work is in fact not performed within workplaces at all. Most of the activities performing the work of education, health, therapy, subsistence, governance do not take place within or under the auspices of workplaces in the sense recognizable to mainstream categories at all. The economic, social, cultural and political work of remote communities has not been separated off from the life of the community as a whole. The distinctions between home and work, public and private, family and fellow workers, do not have the same hold as in the mainstream.

Indigenous peoples have been performing the work necessary to reproducing ways of life that have enabled people to lead rich and fulfilling lives from time immemorial. Despite the intrusion of 'service providers' much of the life of remote communities is continuous with this older less differentiated form of life. And communities treat competence as useful generally, not just for narrowly defined vocations or 'industries'. For example, if someone has been a good teacher in the school for a few years and shows themselves to be a reliable, dedicated, resourceful and responsible worker, they may be 'told' to leave the school and use their competence in the Council Office. Similarly, a survey of graduates of Batchelor Institute shows over 90% of them are in employment, but that very few are in the 'industry' for which they trained.

Communities which do not have highly differentiated workplaces do not require highly differentiated training. Without denying the need for a industry-specific component, training that was more generic would be more useful to remote Indigenous communities. The notion that all work is industry-specific is itself a cultural imposition.

LLN as gatekeeper

One of the ironies of LLN policies for Indigenous peoples is that although intended to increase access for culturally and linguistic groups, in fact LLN prototypically functions in practice to formalise and rationalise the very exclusions it is claims to address. For example, in the Northern Territory there are Aboriginal Health Workers who have been working for years in communities coping with critical events that are well beyond their LLN capacities, yet these workers are considered not to meet the LLN requirements of their positions and to be 'uneducable' given current provision of education and training resources for LLN. So, there are discussion about how to provide 'career advice' for these workers to encourage them to vacate their clinical positions and move sideways into 'driver' positions. Something similar is emerging regarding Indigenous school principals in remote community schools.

In both these cases, and if LLN is mandated universally, then across other industries as well, Indigenous workers who are competent, who can in fact perform in ways that the most highly qualified 'Whitefellas' cannot, will be counselled out of their workplaces—to the detriment of the community. Probably, the new incumbents will have to be 'whitefellas'. And so we return to the old colonial system yet again.

However a monolingual, monocultural interpretation of LLN centred on urban workplaces, does not only create an assessment instrument for excluding Indigenous workers from employment in their Indigenous workplaces, it also provides a placement tool that tends to screen Indigenous people out from undertaking further studies. According to Cummins (2000), a Canadian researcher who is acknowledged as a world expert on the learning of academic English by second language students, ESL students require five extra years to attain the same standards in academic English (CALP, cognitive academic language proficiency), as mother tongue students. Thus students who have mastered basic English literacy and numeracy still need to continue developing CALP (cognitive academic language proficiency). Like other ESL students, Batchelor students are always in a situation where their academic English language proficiency 'lags behind' their conceptual or practical competence.

If Cummins is correct in his summary of the research, this 'English academic discourse' deficit cannot be 'made up' by basic literacy and numeracy courses, nor by access or bridging courses. The fact that academic language and literacy standards and expectations rise at each level means that Batchelor students continue to be 'under-prepared' throughout their entire course of academic studies; at every level their English academic discourse proficiency (CALP) lags behind their conceptual understanding, thus requiring continued support and explicit development. This means that students at Batchelor require not only front-end preparatory study or basic literacy and numeracy, but also 'academic English intensive' units of work right throughout their academic studies careeer.

But the forms of English LLN learnt in the workplace and VET will tend towards the BICS (basic interpersonal communicative skills) pole of the language proficiency spectrum not the CALP (cognitive academic language proficiency) pole, and thus will not provide an adequate preparation for academic or civic regions of LLN which rely on more abstract, formal genres of address and utterance, Graeco-Latinate lexis of technicality and written forms of communication, documentation and validation.

To unthinkingly impose a presumed level of LLN on a particular competence can, given this 'language lag' simply ensure that Indigenous people are excluded from the practical engagement in the workplace which provides the relevance and contextual sense necessary for language learning to take place at all. To deprive people of access or engagement with the practical or theoretical meanings providing the referents and substance of a discourse or register is to in fact deprive them of the conditions for learning that language at all—unless that access is to be provided 'off-the-job' in educational institutions. But, as everyone agrees, much 'off-the-job education and training is based on decontextualised English speech and textbooks.

Batchelor would strongly insist that, for Indigenous people particularly living or working in remote communities, the assessment of practical (or theoretical competence) meeds to be decoupled from assessment of the ability to express that competence in English. The practical and theoretical competence of Indigenous people for whom English is a second language always exceeds their LLN, yet they still need support for extending their English LLN.

Although it should not be used to assess their workplace competence, Indigenous workers do need as much English LLN as they can get. And they themselves are always demanding more!

VET as the only second chance enabling education available to Indigenous adults

The restructuring of TAFE into VET has meant that (increasingly) the only way Indigenous adults can make good their failed schooling is through VET. This means that for Indigenous adult students, worksites and VET do not instantiate a single separate social domain within modernity or post-modernity—the world of work; rather, for 'second chance' Indigenous students, worksites and VET are the context for a general encounter with modern life as a whole. What for other Australians is considered a narrow vocationally focused training will, for 'second chance' Indigenous students comprise the whole of their education or training. Their understanding of underpinning culture and knowledge and language and institutions of the social system as a totality will be filtered almost entirely through their experience of the institutions, culture and practices of the workplace.

Thus, not offering a serious ALBE general education to Indigenous adults does not mean that they do not receive a general education into modern Australian and global life, rather, it means that they will interpret what *is* offered to them as if it were a general education, a general introduction into the world at large. So, what is contained in VET Training Packages will be treated as a metaphor of what the mainstream has to offer in general. And so, as the only adult education now available to Indigenous adults, VET will be interpreted as encompassing the whole of adult education, not simply one part (vocational training) of a much broader system of adult, community and tertiary education.

This tendency has been reinforced by the alignment of VET and Higher Education on a single grid (AQF) in a way that encourages everyone to assume that the normal learning path to higher studies or professional work for adults is by beginning at Certificate 1 and working your way up through VET to Post-graduate studies. This is certainly becoming a norm for many students of Batchelor Institute.

But VET does not provide a general foundation for academic studies or general knowledge

These students are encouraged to believe two things: one, that succeeding at one year of study prepares you to successfully engage with the following year's study; and, two, that what is learnt in workplace education is in fact a full education that enables you to engage with the full society and culture of mainstream life. Tragically, both assumptions are dubious. First, the diagram offered of a seamless learning journey from Certificate 1 up to Postgraduate studies is radically misleading, principally because the medium of both instruction and competence shifts from situated conversational speech in the workplace to the abstract written standard academic English of higher studies. There are two key crisis points for Batchelor students: Certificate 3 where basic English LLN is required and post-Cert. 4. where more extensive Academic Literacy is required. Secondly, the discourses circulating in the workplace and in VET are not representative of the full range of discourses underpinning other major institutions in modern life.

These two facts mean that VET has now positioned itself as the primary vehicle of 'second chance education' for adult Indigenous Australians. Insofar as VET has now displaced ACE or ALBE and has assumed the tasks of enabling and tertiary preparation, Indigenous adults are doomed to disappointment and failure. Somewhere along the way, limited English language, English academic literacy or limited 'cultural literacy' will let these students down. In short, the equivalent of a general secondary education—the usual preparation for undertaking academic studies—is not to be found in Training Packages as presently constituted.

[It is important to insist that the argument being made in this response is not focused on a lack in adult indigenous people, nor simply in a mis-match between them and the mainstream system.

The focus is on the inadequacy of the form of education and training on offer to adult Indigenous people. The lack is in the training system.]

If it is true that VET now provides the only learning path for Indigenous adults, a ladder that now reaches into the secondary schooling of young Indigenous peoples, then it is imperative that VET and its LLN aspects not be framed in such a way as to place a barrier between Indigenous people and a deeper understanding and participation in the wider society. VET and LLN in VET will need to take their role as the primary vehicle of 'second chance education' for Indigenous young people and adults very seriously. It is not simply training a workforce, it is educating the people for all regions of their life.

The issues that need to be explicitly named and addressed in 'Language, Literacy and Numeracy requirements in the *Standards for Registered Training Organisations'* include the following:

- the probability that LLN assessment and placement will function as a *de facto* gatekeeper to exclude Indigenous workers and students from the opportunity for *in situ* learning in the workplace
- the repeated expressed desire by Indigenous people (especially elders, parents and 'uncles/aunties') for efficient and effective teaching/learning of English LLN
- the repeated insistence of Indigenous adults that they have the right to retain and reinvigorate their own Indigenous languages and literacies
- the seriously inadequate schooling, especially secondary schooling enjoyed by Indigenous adults
- the fact that Indigenous workers and students always function at a practical or conceptual stage beyond their current English LLN competence means that assessment of English LLN does not accurately represent their actual competencies
- the need for systematic and sustained 'second chance education' concentrated on the teaching/learning of academic, cultural, civic and professional discourses comparable in outcome to a good secondary education
- If VET displaces ACE as the primary form of adult education for Indigenous adults, then it is imperative that VET and especially its LLN aspects not be framed narrowly in terms of a single industry or the world of work and that VET provide the underpinning cultural knowledge, language and skills that are transferable to other social domains besides the workplace