

Risk management for non-English speaking workforce

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1. Background

Approximately 5% of Australia's workforce have levels of English proficiency so low that without language support (translation or interpreting) the legally mandated provision of safety information in English is ineffective, exposing both employees and employers to risk.

This document details elements of the risks, argues for objective and accurate assessment of language proficiency as a prerequisite to determining the need for language support and proposes some practical and readily applied methods of doing these things.

2. Occupational Health and Safety

Under OHS there are four distinct motives for employers and/or employees to create a safe working environment and exemplify safe behaviours in the workplace.

1. Legal obligation.
2. To mitigate likelihood and control damage in the case of litigation.
3. To minimise availability of political ammunition.
4. To keep people safe.

1. Legal obligation

The OHS or Workplace Safety legislation of each state of Australia makes it a duty of employers to provide safety information to employees:

WA *"The provision by an employer to the employees¹ of the employer, **in such languages as may be appropriate**, of information relating to safety and health in connection with the work carried out by the employee."*

Queensland *"the provision of any information, training, instruction or supervision that is necessary to protect all persons from risks to their health and safety arising from work carried out as part of the conduct of the business or undertaking;"*

NSW *"Information, training and instruction"*

¹ In the context of the legislation "employee" means any person to whom safety information is to be provided, including therefore for the purposes of interpreting the legislation, contractors whose actual "employer" may be the company they work for, as well as visitors to the site.

*(3) The person must ensure, so far as is reasonably practicable, that the information, training and instruction provided under this clause is provided **in a way that is readily understandable** by any person to whom it is provided. ²*

Victoria *“(c) provide information to employees of the employer (**in such other languages as appropriate**) concerning health and safety at the workplace, including the names of persons to whom an employee may make an enquiry or complaint about health and safety.”*

“Safety information” and information that employers are obliged to provide or obtain can take a number of forms, including but not limited to:

- Company, site and project inductions
- Specialist training (confined space, working at heights etc.)
- Standard Operating procedures
- Safety Data Sheets
- Daily pre-start meetings for project work crews alerting them to hazards that may appear or disappear on a daily basis
- Lists of hazards associated with a specific work task and the countermeasures that have been implemented for each of them as found documented in Job Safety Analyses (JSAs, Safe Work Method Statements or equivalent documents)
- Signage
- Safety bulletins and other distributed written material
- Minutes of Safety Committee meetings
- Verbal instructions from Safety Officers, traffic controllers, riggers, team leaders etc.
- Information gathered in the course of an incident investigation
- Information on Return to Work employee rights
- injury registers and reports of incident investigations

Provision of information assumes, and is specified in many of the pieces of legislation, that the information is provided in a language appropriate to the employee. If it is offered or made available in a language in which the employee has insufficient proficiency then the information has not been effectively “provided”.

To ensure that English information is being effectively provided, an employer must satisfy themselves that the appropriate language is English, and if it isn't, then to take such steps as are necessary to provide it, such as having the information translated. This means that they must assess the English proficiency of each employee.

This is a serious defect in this system that leads to employers being exposed to risk.

² <https://www.legislation.nsw.gov.au/regulations/2017-404.pdf>

Managers, and engineers in particular, are very well accustomed to the requirement for an objective, verifiable testing methodology when it comes to such things as product quality testing, soil testing, weld testing or indeed for the assessment of safety hazards. They will not hesitate to engage third parties, whose expertise is in testing, and who will be commercially and often legally bound to account for the results they produce.

But language is a “soft” issue and the need for independent and transparent results of language testing rarely occurs to anyone. Instead, people with no expertise or accountability in language testing, and sometimes with conspicuous conflicts of interest, make informal, ad hoc judgements, with the result that people with very limited English are judged to have sufficient English to process safety information offered in English.

This raises the likelihood of people coming to harm, causing conflict through failing to follow rules, providing observers with grounds for objection to having contractors or foreign workers on site and obviously exposes the employer to the risk of civil litigation and criminal penalties.

Failing to validly assess English proficiency can lead to a failure to provide safety information in the appropriate language, and so is either a breach, or may be a factor contributing to a breach of the legislation.

The method by which English proficiency is assessed must therefore be valid.

Accurate and objective measurement of language proficiency is possible, though the costs, commitment in time and requirement for specialist input would be fatal obstacles to the responsiveness required for many types of workplace. There are however some practical measures are described below that are applicable anywhere, at minimal cost and which will yield a far more reliable indication of an individual’s ability to understand safety information as provided to them in English.

The conflict of interest that invalidates an informal, ad hoc assessment of English proficiency, is that often both the employer and employee have a financial interest in avoiding any fuss or interruption to the commencement and continuation of work.

Of course, this applied equally to all risk mitigation measures in the past and were all overcome once the risk was properly understood. But before that understanding of language-related risks is acquired, both parties are motivated to overstate language proficiency, and understate the risks, which can be done with impunity as there is no agreed methodology and no records kept.

Any safety system that fails to take these issues into account, leaving the issue of effective communication in a pool of darkness when every other safety issue is brightly illuminated, is defective.

This table below sets out many of the defects in an initial ad hoc assessment and subsequent interactions.

a. Individual differences between people carrying out assessments of different people	Employer has no reliable data on which to rely in the case of an investigation.
b. Person being assessed believes they have understood something sufficiently, or overestimates their own understanding, and, employers form the view that the employee is proficient in English on the basis of facial expressions and affirmative statements made by the employee.	<ul style="list-style-type: none"> • There may be a very high level of social pressure on the employee to perform in English and it is extremely difficult even in a one-on-one dialogue to confess that they don't understand, so they pretend, or even persuade themselves that they have understood. • People in many cultures would rather pretend to understand than waste the time of someone they perceive as superior. • The English speaker will readily accept that someone has understood, as it is frustrating and work-making to admit otherwise.
c. A judgement is formed of the employee's English on the basis that they are able to form English sentences.	The big problem here is that people rarely attempt to say anything which they may get wrong or which would make them appear foolish in the attempt. Therefore, what you hear them say will be strictly limited to what they are <i>comfortable</i> saying. But it may be only a very small percentage of what they <i>want</i> to say, or <i>need</i> to say, in order to fulfil their obligations under their position description or the legislation.
d. A judgement is formed that the employee is able to understand complex work instructions on the basis of very simple conversational themes that are well within the employee's capabilities and experience.	From the point of view of someone with very limited English there is a world of difference between the following two conversations: "Hello. What is your name? Where are you from? How old are you?" etc. questions they will answer with confidence because they've answered them many times before and "OK we need these trolleys unloaded, in this order, and the boxes taken upstairs and kept more or less in the same order, unless you can see that any are broken in which case I want you to stack them over there and one of you write list up each packing list number on this clipboard. Understand?" If they don't understand this, it will be very hard for them admit it if they have just answered that first lot of questions.
e. Employers believe that it is sufficient to use simplified English (Pidgin, "baby talk" etc.) and sign language.	If this were remotely true that's how English speakers would work together all the time. It usually just makes things worse.
f. The input to conversation and the reactions and subsequent actions of the non-English speaking employees seem to confirm that they have understood all that was being said.	The problem with this is that they could very well have known all these things already and that the communication has not added anything. Therefore, it is not conclusive proof that they understood the conversation you have just had with them. Furthermore, communication is less important when everything goes smoothly. It is the unforeseen and the accidental that safety information is trying to prevent.

<p>g. Employers assess the employee to be proficient in English because their answers to questions make sense.</p>	<p>The problem here is the assumption that all misunderstanding will be visible to the English speaker. Many people with limited English proficiency will respond to English questions with answers that are grammatically correct and plausible in the context. But it can be the case that while the non-English speaker <i>thought</i> they understood the question, they actually haven't, and/or that what the employee gave as their answer meant something in English quite different to what they wanted to say.</p>
<p>h. English proficiency is assessed as too low to be functional, but it is assumed that the person will be assisted by a member of their party with better English.³</p>	<ul style="list-style-type: none"> • Ability to speak English does not equal ability to translate (see below). • This assumption is also unsafe because the “English speaker” will have no legal or commercial responsibility to translate accurately, faithfully, constantly or completely and so be of no use in confirming for the employer that the safety information has been provided. • More fatal to this assumption is that even for an experienced translator, translating all day is fatiguing work (see below) and cognitive resources are, like everything else, finite. So whatever brain power the most fluent of the party is being obliged to consume by being the ad hoc translator, is no longer available to them to execute all the other work they are actually being paid to do. • Lastly, this arrangement can be counterproductive as the ad hoc translator can be conflicted. It might be assumed that they will provide complete and unbiased translation, but they may be under pressure to edit or omit information for commercial or political reasons.

Failure to assess English proficiency is a failure to assess the risk. The risk is that the company may fail to provide information, training and instruction. This then exposes them to the risk of being in breach of OHS legislation or standards.

2. To mitigate chance of litigation

The next most powerful incentive for an employer to implement and police OHS standards is to minimise the risk of being held liable for any injuries sustained by anyone on site. While that liability will never be zero, findings in court may be more punitive if it can be shown that safety information (listed above) was not

³ Worksafe Victoria have published a Compliance Code “Communicating Health and Safety across Languages” (<https://content.api.worksafe.vic.gov.au/sites/default/files/2018-07/ISBN-Communicating-occupational-health-and-safety-across-languages-compliance-code-2008-09.pdf>) which recommends the use of “bilingual facilitators” to assist in a variety of workplace settings. The author disagrees with these recommendations on various grounds including but not limited to: there being no valid definition of “bilingual”; no amount of proficiency in two language necessarily enables a person to translate; and that unless the person is bound commercially to account for defined levels of quality in the translation of information then the employer is still exposed to the risk of having failed to fulfil their duty to provide safety information, instruction, training and supervision in the appropriate language as far as is reasonably practicable.

provided in an effective manner to non-English speaking employees, contractors or visitors.

Any competent lawyer will seek out the critical points at which safety information was not effectively communicated to the injured party, and if those failures could be shown to be factors contributing to the accident they would use them as arguments.

It is therefore important for the Employer to leave a paper trail, and be seen to be fulfilling all their legal obligations.

The decision on whether to have safety information translated or provide language support or not should not be based on a self-assessment of language proficiency during the early part of the relationship, but rather on how they would describe their own English to a barrister in court during litigation over a workplace injury.⁴

3. To prevent political enemies from obtaining ammunition

Any obvious breach of safety rules, and more seriously, any near misses, injuries or workplace fatalities will inevitably be used by parties with current or harboured antipathy towards the employers, in political conflicts between outside contractors, organised labour and management. Regardless of whether conflicts actually arise, many of these parties are certainly in the habit of carefully noting and recording any information that may be used strategically in the event of a conflict.

⁴ There have been a number of reported cases where failure to provide safety information in a language readily understood by a worker were contributory factors to serious injury or death:

<http://www.smh.com.au/national/fosters-fined-for-workplace-death-20080805-3qjd.html>

“Union members at the Abbotsford brewery had called for its safety guidelines to be translated into other languages but were ignored, Liquor Hospitality and Miscellaneous Union spokeswoman Jess Walsh said outside the court.”

<https://www.commerce.wa.gov.au/announcements/scrap-metal-yard-fined-80000-over-worker-death>

“The yard employed a number of Chinese nationals with varying levels of understanding of the English language. The deceased worker spoke very little English.”

<http://workplaceohs.com.au/hazards/vulnerable-workers/cases/record-fine-over-migrant-s-fall-into-chemical-bath#.Wf0QO1uCzDc>

“Big Mars admitted it did not have WHS policies regarding risk management and that it left safety considerations to Thomas Foods. It further admitted to not taking steps to address the communication issues faced by employees who did not read or speak English and who worked alone in the abattoir. Thomas Foods had provided Mr H with a written work instruction in English and some on-the-job training but, as Big Mars knew, Mr H did not read or understand English.

Magistrate Lieschke heard that when Mr H asked a Thomas Food supervisor, who spoke Mandarin, to interpret the document for him, he was told to interpret it himself, in his own time with an online translation dictionary.”

Any safety breaches or poorly maintained safety systems and standards can therefore be directly linked to reputational damage and financial losses for reasons entirely separate from the costs of the incident.

4. To actually keep people safe

Though this is the most emotive and therefore politically acceptable rational for providing a safe workplace and working safely within it, sadly it is the least effective. No matter how much hard evidence is presented to a workforce establishing that it is clearly in the interests of each individual to look after themselves by complying fully with the safety systems, any day on any worksite you will see people who must still be told to wear their safety glasses, earplugs or gloves, and it requires that those four reasons above have stacked up first. The thing that finally motivates them to do it is being told to by their supervisor, who in turn is motivated at least as much by their knowledge of the legal and commercial risks to the company or risks to the project as they are by concern for the individual's wellbeing.

3. Competent language support

NAATI

In Australia The National Accreditation Authority for Translators and Interpreters ("NAATI") sets minimum standards in the industry by designing exams and accrediting practitioners who pass them.

It was established in 1977 by the Federal and State governments with the objective of ensuring a supply of people with a minimum level of competence and experience, dedicated to assist members of migrant communities who were otherwise at a disadvantage when accessing government services or the subjects of government processes (Immigration, health system, police and justice, welfare etc.)

But the success of NAATI is measured by quantity not quality. It is far more embarrassing for the government for certain language communities to be left without interpreters, than for an individual interpreter to mistranslate something, even though the consequences for the non-English speaker could be dire.

Translators often make mistakes but this is merely a linguistic issue in which NAATI has little interest. Failure to supply however is a political failure, and a failure of NAATI's primary function as defined by its owners, the governments.

All other things remaining equal, and across many instances, effective outcomes are more likely to be achieved by using practitioners who have passed a NAATI exam. But the primary purpose of NAATI is to guarantee supply of interpreters and translators in

all languages, including some language communities who have very low levels of “educational preparedness” (well-established educational infrastructure in their country of origin; the habit of study and preparation for exams, a culture of career advancement through self-improvement etc.) and to meet this target the bar is set quite low.

The competencies required to translate documents and conversations that have a major risk profile, such as anything involving the provision of safety information on a worksite are quite a bit higher than those verified by NAATI exams.

Not “Bilingual”

In this section I set out some of the competencies that are required to address the problems described above.

First though I must dispel the common misconception that anyone with two languages can translate. It is as far from the truth as assuming that anyone with two hands can play the piano.

Without going into the technical details, a bilingual person can say and process what they want, how they want, and as fast or slowly as they want, just like anyone else, with the sole difference being that they can do this in one or other of two languages.

Usually one (their first language or “Mother Tongue”) is better than the other, by varying degrees, depending on their second language proficiency.

What they say is a product of and naturally limited by their own thoughts and vocabulary. They are under no pressure to do otherwise. They possess in their minds all the background and motive for speaking, and their speech is limited strictly to what they feel comfortable saying, given their proficiency in that language. They are under no necessary obligation to understand what anyone else says to them.

This is in sharp contrast to a professional translator who is presented with the product of someone else’s thought processes and is obliged to convert that immediately into a sentence in the target language, in such a way that it meets standards of accuracy and faithfulness (each of those words has a strict definition).

They must listen, capture everything, design and produce a new sentence in a heartbeat, and do all this without the benefit of all the background knowledge that the speaker has in their head, nor an understanding of the outcome intended by the speaker, nor the contextual information that all the listeners possess.

This is extremely demanding work and exercises parts of the brain that have nothing to do with speaking or listening on your own account.

Fatigue management is a major issue for interpreters, with industry standards assuming that a person can interpret dialogues consecutively for an hour without a break and

interpret simultaneously 20 minutes on and 20 minutes off (as a member of a team of two or three)⁵.

Without being an interpreter it is difficult to imagine how taxing it is but the experience can be simulated in the following way (you will need an assistant):

- Start playing Tetris on your computer (with the sound off)
- Have a TV or radio on nearby with someone speaking
- Listen carefully to around 20 seconds of this speech⁶
- Try to remember everything you hear
- Have your assistant mute the sound after 20 seconds or so
- Repeat back every word you heard, precisely
- Have them turn the sound back on the second you finish
- Do this over and over, for at least a couple of minutes while playing Tetris the whole time

This simulates the mental stress caused when listening, committing information to short term memory, recalling it and speaking intelligibly, all at the same time as you are making decisions about where to place something and how it can be best oriented, with the timing of all these tasks *outside your control*.

Please try this, and then imagine doing it all day, without missing any words, and with your income depending on it. Then imagine producing everything into another language.

Even just a couple of minutes is enough to start understanding the fatigue and stress to which an interpreter may be subject. A person can be perfectly bilingual, living their life in two languages for years, and yet never have experienced anything like this.

Performing these tasks, coping with the stress and satisfying clients is a skill set that takes considerable native aptitude and many years' practice to acquire.

Competence

- An interpreter must be able to produce sentences that are both complete, accurate and produced in a register and using a terminology that is completely natural to anyone working in that field, and which is a faithful reflection of the speaker's intent.
- This requires intense preparation and study prior to a job commencing and this in turn requires cooperation from the client in the form of information about and reference material related to the job.

⁵ "Consecutive" interpreting is where speakers take turns, and hear everything. The interpreter waits for a speaker to finish a sentence or group of sentences, and then every waits while the interpreter translates this, and so on. This adds time to the proceedings, but allows far more accurate and carefully structured sentences.

"Simultaneous" interpreting is where the interpreter translates as the person is speaking, with a lag of no more than one or two seconds. This is either facilitated by audio equipment, or they sit next to at most three listeners and whisper their translation. Is much quicker but the quality is lower and the flow of information is one way.

⁶ 20 seconds is the average length of an utterance in normal conversation, but it can of course fluctuate between a fraction of a second to over a minute.

- If the speakers of a particular language are dominant in a meeting, with the secondary language group largely listening to the dominant languages speakers discuss things among themselves (like a group safety induction), the interpreter must be able to translate this simultaneously for the benefit of the listeners, and where necessary switch to consecutive mode when the speakers of the secondary language wish to contribute or are asked a question.
- They must also be able to interpret simultaneously where presentations are being given to large groups of people or media is being shown that has a narration etc.
- They must produce their translated sentences immediately, and upon discovery of any mistranslation or misunderstanding they must immediately correct this.
- They must be able to do all of these things for as long as required while negotiating reasonable fatigue management measures with the client or employer.
- They must also remain perfectly neutral on all and any political or ethical issues that may otherwise constrain a speaker whose interests were otherwise in conflict with the goal of producing accurate and faithful translations.

The process of translating written safety information requires more than a single individual translator. Both the background and the intent of the text must be understood, and to obtain this understanding the cooperation of the author/end user/owner of the document is necessary. They must be able to answer all the questions about the text and the context before, during and after the actual drafting of the translation, and may have to make previous versions, related documents or other subject matter reference material available for the draft translator.

After drafting it is almost always advisable that another translator, preferably a native speaker of the language other than the native language of the draft translator check and edit the work, in collaboration with the draft translator, and the author/end user/owner of the document.

Coordinating all this information and activity requires a specific skill set that is also not defined or tested by NAATI.

Dedicated and accountable

As explained above, the demands of interpreting take up all the mental resources that an interpreter has available, and this is the same expectation that an organisation would have of any other paid function.

Typically, each function in an organisation is filled by going through the following steps, which provide clear, verified accountability:

- In their youth the person has demonstrated an aptitude and interest in a certain type of work.
- They have completed a course of study in the theory and practice of that type of work.

- Where applicable they have obtained a credential that attests to this study as well as permitting or licencing them to carry out the work on a fee-for-service basis in the case of regulated occupations.
- They have held themselves out as candidates prepared to take responsibility for that type of work.
- They have responded to a call for that type of work (in the form of an advertised position for example).
- They are then engaged under a Service Level Agreement or employed under a Position Description that details that type of work and no other.
- Then and only then may they be legitimately held to account for their performance of that type of work.

It is by establishing this chain of governance that an organisation maximises the chances of successful execution of that type of work task and is able to hold that individual to account for those outcomes and no others.

This is considered perfectly normal for all functions in an organisation: trades, cleaners, accountants, marketers, line operators, caterers, sales managers and the CEO. Indeed, it would be a serious defect in any system of human resources management to neglect or omit any of these steps.

The benefits of translation support can similarly only be obtained once the translation function is embedded in an organisation or outsourced to a specialist contractor via these same steps.

It constitutes a complete failure of governance to attempt to paste the translation function onto someone else's existing role simply because they are bilingual. It will inevitably retard their ability to do their actual job and leaves the organisation with no recourse should they fail in their role as ad hoc translator.

Assessing proficiency

All the matters set out above may or may not be important depending on the level of English proficiency in the visiting overseas personnel or non-English speaking workers. A reliable and valid method of language assessment is therefore a critical element of all Safety Systems, risk management policies, and of project planning.

Language proficiency can be measured objectively in numerous ways: size of vocabulary, average sentence length, words per minute produced/processed, lexical density (ratio of unique words to total words) and by many other indicators, delivered through tests of varying complexity.

Proficiency in English enables access to the world's freest countries, the most notable educational institutions, the greatest fund of scientific literature and the largest employment market. It has more words than any other language and is easily the

world's most studied language (more people study English than study French, Spanish, Italian, Japanese, German and Chinese combined).

This in turn has created a demand for universally recognised and portable proof of proficiency, and this demand is met by a number of organisations that claim to provide this, and who list the many global corporations that recognise their Certificates⁷.

They do all offer some insight into how well a person can comprehend and work in English, but the business model of all these bodies is at odds with the interests of a person charged with managing risk to life, limb, plant, program and budget. The income of a testing body relies on large numbers of fee-paying exam candidates - not on the satisfaction of the employers, training organisation or immigration departments that rely on the test results.

Therefore, they have a commercial interest in certifying as many people as possible, which necessarily converts their product over time from measured quality to controlled quantity.

This does not help the project manager for whom the quantity of Non-English speakers is fixed and irrelevant. What they need to know is "Can this person use English well enough to not introduce risk to the project?"

There is a relatively simple way to confirm this. It requires some mental discipline, some straightforward activity and a simple question.

Firstly, it is the party with the greatest risk who must own this process and there is a lot that an Australian employer can achieve simply by having a conversation with them.

But they must approach the task in a state of mind free from the normal emotions and reactions we would bring to a discussion about language in our day-to-day life. The following must be completely dismissed:

- Expressing admiration for the effort we imagine that they must have put in to learn what English they have
- Expressing embarrassment that we have so little second language ability ourselves
- The adoption of pidgin or baby talk in the hope that this will be easier for them to understand (it isn't, it's much harder)
- And the general dumbing down of the ambient conversation to include them (or alternatively the resignation that they will remain on the outer while everyone else chats naturally to one another)

This is not a language school, or a speech competition, or an international goodwill mission. It is a multimillion dollar operation or project on which profit and reputation rely, and which must be carried on or completed safely, on time and under budget.

⁷ The International English Language Testing System (IELTS), Occupational English Test (OET), Test of English as a Foreign Language internet-Based Test (TOEFL iBT), Pearson Test of English (PTE) Academic, Cambridge English: Advanced (CAE) test and Test of English for International Communication (TOEIC) for example.

This conversation must be carried out coldly and dispassionately and must include the following features.

- Do not modify your speech. Speak as quickly and as naturally as you would to another English speaker
- Ask open-ended questions. That means not “yes or no” questions, but ones which oblige them to construct longer, more complex sentences. “What do you think would be the best way to ..”
- Introduce themes that have absolutely nothing to do with their work or with things you have previously discussed and see how they handle them
- Require them to report speech. Ask them questions about what someone said in another place and time and see if they can replay the conversation.
- Ask hypotheticals. “What would have happened if we had done this instead of that?” “Which would be better out of this option and that one?” Are they able to answer questions like this after hearing them only once?
- Take careful note of how agile they are. This means, are they aware of their own mistakes and mispronounced words and do they correct them on the fly? Are they comfortable in asking you to repeat things or explain if they have not understood something?
- Test them after they have been listening to conversation between English speakers and see if they can explain what it was they heard. (This is an ideal way to see if they can handle reported speech, above)

After doing some or all of these things, there remains but one thing to do: ask yourself “Could I do MY job, with HIS/HER English?”

If the answer is “No” then there is a problem that must be addressed.

There is a specified level of performance and it is not being met. If this was a pump, with a rated output, and this was not being met, no engineer would hesitate for a second to analyse the problem, and either rectify it or replace the pump. They would not worry about hurting anyone’s feelings in fact they would be completely derelict in their duty if they failed to act.

But here is a defect in the process of communication - a function critical to every aspect of project management – and it demands immediate attention.

4. Conclusion

Effective communication is a critical organisational function. The variable English proficiency of overseas technical advisors or non-English speaking staff can introduce serious risks to safety and effectiveness, but these risks currently fall into a management blind spot, unchallenged due to an incomplete understanding of how language works and in some cases a fear of cultural sensitivities.



The risks are too great for this situation to be sustainable. The issue must be brought to light and treated in a professional way, with risk, expertise and resources allocated rationally.

The expectation that those with the greatest risk take responsibility for assessing language proficiency and implementing appropriate countermeasures should be normalised. This means that the views of anyone with a conflict of interests regarding English language proficiency must be put to one side, and the question asked dispassionately and with a full understanding of the need to manage risks to people, plant and reputation according to standards generally accepted in Australia.

Language represents a significant area of unmined management innovation and potential improvement of indicators such as safety, cost and quality across a range of industries.