

## POLICY STATEMENT

This policy is designed to foster an inclusive, culturally safe, and equitable learning environment that recognises, respects, and celebrates the diversity of all learners, with particular emphasis on addressing the unique needs and experiences of First Nations people. We acknowledge that systemic barriers have historically limited access to vocational education and training (VET) for First Nations Australians and other marginalised communities.

This policy ensures that all individuals, regardless of their cultural background, socioeconomic status, ability, gender, sexuality, age, or other characteristics, have equitable access to high-quality education and training opportunities.

## ACKNOWLEDGEMENT OF COUNTRY

We acknowledge the Traditional Owners of the lands on which our organisation operates and recognises their continuing connection to Country, culture, and community. We pay our respects to Elders past, present, and emerging, and acknowledge that sovereignty was never ceded. We recognise that First Nations people have been the first educators on this continent for over 65,000 years.

## SCOPE

This policy applies to all employees, students and third-party partners operating under a third-party arrangement. Access and equity are supported by legislation, including, but not limited to:

- Criminal Code Act 1995
- Anti-Discrimination Act 1977
- Disability Discrimination Act 1992
- Racial Discrimination Act 1975
- Criminal Code Act Compilation Act 1913 (WA)
- Crimes Act 1900 (NSW)
- Anti-Discrimination Act 1977 (NSW)
- Sex Discrimination Act 1984
- Workplace Gender Equality Act 2012
- Fair Work Act 2009
- Western Australia Equal Opportunity Act 1984 (WA)
- Australian Human Rights Commission Act 1986

## DEFINITIONS

**Access and Equity:** Policies, procedures, and practices responsive to the individual needs of clients whose age, gender, cultural or ethnic background, disability, sexuality, language and numeracy skills, unemployment status, or remote location may present barriers to access, participation, and achieving suitable outcomes.

**ACSF:** Australian Core Skills Framework

**RTO:** Registered Training Organisation

**CEO:** Chief Executive Officer

**Reasonable Adjustment:** Actions taken by the RTO in training or assessment to allow students to meet the same outcomes as those without a disability or impairment, without altering the integrity of the training and assessment requirements or causing unjustifiable hardship for the RTO.

**LLND:** Language, Literacy, Numeracy and Digital Skills

**HR:** Human Resources

**Unjustifiable Hardship:** As defined in the Disability Discrimination Act 1992 (DDA), section 11.

**Zero Tolerance Culture:** Maintain a zero-tolerance approach to racism, discrimination, harassment, and bullying in all forms.

**Proactive Monitoring:** Regular assessment of learning environments to identify and address potential safety concerns.

**Inclusive Spaces:** Design physical and digital learning spaces that reflect cultural diversity and promote belonging.

**Confidential Reporting:** Multiple pathways for students to report concerns, including anonymous options and culturally appropriate support.

**Cultural Safety:** An environment where First Nations people feel safe to express their cultural identity without being challenged, judged, or subjected to racism, discrimination, or stereotyping.

**Cultural Competence:** The ability to interact effectively with people from different cultural backgrounds through awareness, knowledge, and skills.

**Under-represented Groups:** Groups that have historically had limited access to VET, including but not limited to First Nations people, people with disability, culturally and linguistically diverse communities, women in non-traditional fields, and people from lower socioeconomic backgrounds.

**Racial Vilification (Civil):** Racial vilification occurs when a person publicly says or does something that is reasonably likely to offend, insult, humiliate or intimidate another person or group because of their race, colour, or national or ethnic origin. Under the Racial Discrimination Act 1975, racial vilification is unlawful but is dealt with through civil complaint processes rather than criminal prosecution.

**Incitement to Violence (Criminal):** Incitement to violence occurs when a person encourages, urges or advocates for others to use force or violence against a person or group because of characteristics such as race, religion, nationality or similar protected attributes. Under the Criminal Code Act 1995, urging violence against a group or member of a group is a criminal offence and may result in criminal penalties.

**Antisemitism:** Antisemitism refers to prejudice, hostility, discrimination or hatred directed toward Jewish people because they are Jewish. It can include harmful stereotypes, abusive language, threats, harassment, or actions that target Jewish individuals, communities, institutions, religious practices, or cultural identity.

## RESPONSIBILITY

**Executive Director – Education & Training:** Develop and apply policies and practices that eliminate discrimination and harassment and promote a culture of inclusion and diversity. Provide support and resources to staff and students to facilitate access and equity in training and assessment.

**HR Department:** Ensure that this policy is provided to new staff during induction. Investigate reported incidents of discrimination or harassment.

**Trainers and Assessors:** Uphold the principles of access and equity in all interactions with students and colleagues. Ensure all training and assessment materials are inclusive and accessible to diverse learner groups.

**Third-Party Partners:** Adhere to this policy and align practices with access and equity principles. Collaborate with the RTO to address any access and equity issues that arise within their operations.

**Students:** Disclose any support needs or requirements related to training and assessment and communicate any concerns or issues regarding access and equity promptly.

**Compliance Manager:** Monitor compliance with diversity and inclusion requirements. Maintain documentation of reasonable adjustments and cultural safety initiatives.

## PROCEDURE

### Creating an Inclusive Learning Environment

To ensure we create a learning environment that is safe, accessible and welcoming of all students and is free from racism, discrimination or any other form of harassment in all aspects of our operation.

## Marketing and Enrolment

The RTO will apply inclusive marketing and enrolment practices:

- Design marketing, branding and communication strategies to be inclusive and supportive of various student cohorts
- Include specific strategies to attract under-represented groups to participate in VET courses (e.g. women in traditional trades, First Nations people, people with disability)
- Use diverse imagery and language in promotional materials that reflects our student diversity
- Ensure marketing materials are accessible in multiple formats and languages where appropriate
- Partner with community organisations to reach under-represented groups

## Recruitment and Enrolment Process

The RTO will apply the same process for all students:

- Base course enrolment solely on availability of places and students satisfying course entry requirements
- Provide students with adequate information and support to enable them to make informed decisions on the most suitable course for their needs
- Identify special needs during pre-enrolment and prior to course commencement
- Organise one-on-one meetings with students who indicate they have special needs to discuss their requirements in detail to ensure appropriate accommodations are planned and implemented
- Communicate enrolment details, including any special accommodations arranged
- Maintain open lines of communication for ongoing support throughout the course, encouraging students to reach out for assistance as needed
- Ensure individuals who raise concerns, complaints or grievances are treated with respect and not discriminated against
- Provide students with a fair and equitable Complaints and Appeals Policy through our website and upon request
- Provide students with relevant policies, procedures and course information prior to enrolment through our website and our publicly available Student Handbook
- Gather feedback from students regarding the enrolment and support process to identify areas for improvement

## CULTURAL SAFETY FOR FIRST NATIONS PEOPLE

The RTO actively fosters cultural safety for First Nations people through:

### Respectful Engagement

- Speaking with respect about First Nations culture, knowledge, systems and people
- Recognising that First Nations people do not always have the same level of access to VET as non-Indigenous Australians, nor the same positive experience
- Respectfully engaging with local First Nations community to learn more about their history and culture
- Providing reasonable flexibility to allow students to meet their cultural obligations

### First Nations Voices in Decision Making

- Making First Nations voices part of decision making in the organisation
- Engaging staff and industry experts from First Nations communities to deliver or review training and assessment practices
- Consulting with First Nations community representatives on policy development and review

### Cultural Awareness

- Championing cultural awareness amongst students and staff
- Providing regular cultural awareness training for all staff
- Incorporating First Nations perspectives into curriculum where appropriate and respectful
- Displaying culturally appropriate materials and acknowledgments in learning spaces

## STAFF DEVELOPMENT AND CULTURAL COMPETENCE

The RTO invests in staff understanding of socially inclusive training practices and working with diverse cohorts:

### Training and Development

- Developing trainers' ability to adapt their delivery methods to suit the characteristics of students from various backgrounds
- Raising staff awareness of unconscious bias, racism and discrimination
- Engaging staff in cultural awareness training
- Providing ongoing professional development in inclusive teaching practices
- Training staff to recognise and respond to instances of discrimination or harassment

### Competence Building

- Regular assessment of staff cultural competence
- Mentoring and support for staff working with diverse student cohorts
- Access to external training and development opportunities

## MONITORING AND REVIEW

### Environmental Monitoring

- Regular assessment of learning environments to identify and address potential safety concerns
- Monitoring physical and digital learning spaces to ensure they reflect cultural diversity and promote belonging
- Student feedback collection on the inclusivity and safety of the learning environment

### Incident Response

- Clear procedures for reporting and investigating discrimination, harassment, or cultural safety concerns
- Multiple pathways for students to report concerns, including anonymous options and culturally appropriate support
- Regular review of incidents to identify systemic issues and improvement opportunities

## RESPECTFUL BEHAVIOUR AND ANTI-VILIFICATION CODE OF CONDUCT

The RTO is committed to providing a safe, respectful and inclusive learning and working environment for all students and staff. All members of our organisation are expected to treat others with dignity, respect and fairness at all times. Vilification, discrimination, harassment or intimidation of any person will not be tolerated.

### Expected Behaviour

Students and staff must:

- Treat all people with respect, regardless of their race, religion, nationality, culture, gender, sexuality, disability, age or background
- Communicate respectfully in person, in writing, online and through social media
- Support an environment where everyone feels safe to participate in learning and work activities
- Raise concerns appropriately through organisational reporting or support processes

### Unacceptable Behaviour

The following behaviours are not acceptable and may result in disciplinary action:

- Racism, antisemitism, or any form of prejudice or hatred directed toward individuals or groups
- Vilification, including behaviour that humiliates, intimidates, insults or threatens another person because of their identity or background
- Racial vilification, or publicly saying or doing something that is likely to offend, insult, humiliate or intimidate another person or group because of their race, colour, or national or ethnic origin

- Incitement to violence, encouraging hatred or hostility toward individuals or groups because of characteristics such as race, religion, nationality or similar protected attributes (this is a criminal offence and may result in criminal penalties)
- Displaying or sharing offensive symbols, images or messages that target a particular group
- Bullying, harassment or intimidation in person, online or through electronic communication

## **Respectful Discussion**

We support respectful discussion and debate about social, political and global issues. However, these discussions must not involve harassment, antisemitism, discrimination, vilification or hostility toward any group or individual.

## **Breaches of the Code**

Any breach of this Code of Conduct may be investigated and may result in disciplinary action in accordance with organisational policies and procedures.

## **BULLYING AND HARASSMENT**

In accordance with legislation and the RTO's commitment to providing a safe learning environment, harassment, bullying, and intimidation, including sexual harassment, will not be tolerated. Students are encouraged to speak to their trainer, the RTO Training Coordinator, and/or Student Administration with any concerns. Reported cases will be taken seriously and investigated thoroughly.

### **Prevention Strategies**

- Clear communication of zero-tolerance policies to all students and staff
- Regular awareness campaigns about respectful behaviour
- Proactive identification of potential risk factors in learning environments
- Peer support programs to foster inclusive student communities

### **Response Procedures**

- Immediate action protocols for reported incidents
- Support services for affected students
- Disciplinary procedures for perpetrators
- Follow-up monitoring to ensure no retaliation occurs

## **LANGUAGE, LITERACY, NUMERACY AND DIGITAL SKILLS (LLND)**

Students wishing to enrol in training will complete an online LLND assessment using the LLND Robot. This tool evaluates each learner's levels in learning, reading, writing, verbal skills, and numeracy based on the Australian Core Skills Framework (ACSF).

The assessment is conducted prior to enrolment to ensure alignment with the Australian Qualifications Framework (AQF) level of the desired course. The results are reviewed to confirm the student's suitability for the course. If students LLND levels are deemed inadequate, alternative options, such as additional support or alternative courses, will be discussed to assist in their learning journey.

### **Culturally Responsive LLND Support**

- LLND assessments that consider cultural and linguistic diversity
- Additional support for students from non-English speaking backgrounds
- Recognition of different learning styles and cultural approaches to literacy and numeracy

## **REASONABLE ADJUSTMENT FOR STUDENTS WITH DISABILITIES/SPECIAL NEEDS**

Students with disabilities/special needs are subject to the RTO's standard rules and procedures. The RTO is committed to providing reasonable adjustments to support these students, ensuring equitable access to training and assessment. Adjustments are based on evidence of the disability and its functional implications.

All reasonable adjustments will be documented in a Reasonable Adjustment Plan detailing specific adjustments and support services. Adjustments may include, but not limited to:

- Appropriate and Accessible Materials: Modifying learning materials to accessible formats.
- Flexible Delivery Methods: Adapting delivery modes or class schedules.
- Modified Teaching Methods: Adjusting teaching techniques to accommodate learning needs.
- Adaptable Assessment: Offering alternative assessment methods or formats.

## DISCLOSURE OF DISABILITY/SPECIAL NEED

The RTO encourages learners to disclose disabilities/special needs as soon as possible prior to course commencement. If disclosed less than 30 days before the course starts, the RTO will make reasonable efforts to discuss adjustments. However, adjustments may be limited by training course specifics, location and resources.

## REASONABLE ADJUSTMENTS FOR STUDENTS WITH SPECIFIC NEEDS

At the RTO's discretion, reasonable adjustments may be made for students with specific needs, including but not limited to:

- No Formal Disability Diagnosis but Specific Learning Needs: Students with learning difficulties impacting engagement with standard methods.
- Challenges Impacting Full Participation: Barriers such as temporary health issues, language barriers, fear of assessment, or personal circumstances.
- Requests for Additional Support Services: Extra tutoring or tailored resources.

All agreed adjustments will be recorded in the Reasonable Adjustment Plan.

## REASONABLE ADJUSTMENT PROCESS

Student needs will be identified through initial contact with enrolment staff, receipt of application materials, and orientation events prior to training commencement, where possible.

Reasonable adjustment requirements should be negotiated at least 30 days in advance to ensure effective implementation. Adjustments will be made individually, considering all relevant circumstances.

If adjustments do not enable the learner to meet course requirements, the course may be deemed unsuitable. Concerns will be discussed with the learner to make an informed decision, and alternative training and career options may be suggested.

## PHYSICAL ABILITY

Certain courses/units require specific physical abilities essential for meeting learning outcomes and industry standards. These may include:

- Manual Dexterity: Handling and manipulating tools or equipment.
- Physical Strength and Endurance: Lifting, moving, or holding items as required.
- Mobility: Navigating physical spaces and environments.
- Coordination: Coordinating physical actions and movements.

Students will be informed of the course/unit-specific physical requirements prior to enrolment and may need to declare their physical abilities. If they are unable to meet these requirements due to physical inability, they may not be able to enrol or continue. However, reasonable adjustments will be considered where possible to support their participation. Alternative courses or training programs will also be suggested if necessary.

## PRACTICAL APPLICATION OF REASONABLE ADJUSTMENT

Reasonable adjustment applied to participate in teaching, learning, and assessment activities could include, but not limited to:

- Customisation within the training package or accredited course.
- Modification or restriction of the learning cohort.
- Modification to teaching tools, tasks, and assessment methods.
- Use of different presentation media, learner support, and assistive technologies.
- Provision of specialised equipment or facilities.
- Online strategies for remote learners.
- Accessible information and learning materials prior to enrolment.
- Monitoring adjustments to ensure ongoing learner needs are met.

Trainers and assessors must follow assessment principles, particularly fairness and flexibility. Any policy conflicts will be reported to the Executive Director – Education & Training.

## LIMITS OF ADJUSTMENTS

While the RTO is committed to providing reasonable adjustments, there are limits to what can be accommodated without compromising the course's essential requirements or industry standards. Adjustments are limited to ensure:

- No alteration of the fundamental nature of the course or learning outcomes.
- No risk to health and safety.
- Feasibility within available resources and facilities.

## COSTS AND FEES

If adjustments require additional resources or specialised services, students will be informed of any potential costs beforehand. The RTO will:

- Provide a clear outline of additional costs.
- Ensure students are aware of these costs prior to course commencement.
- Offer guidance on alternative options if costs pose a barrier.

## RISK AND REPORTING

If a staff member determines that a student cannot complete the course or meet requirements due to a disability, and it poses a work health and safety risk to themselves or others, the issue must be reported in writing to the Compliance Manager and Executive Director – Education & Training.

The RTO will provide detailed information regarding adjustments during the pre-enrolment process. All decisions and documentation related to adjustments will be maintained in the student's records.

## QUALITY ASSURANCE AND CONTINUOUS IMPROVEMENT

### Monitoring and Evaluation

- Regular review of diversity and inclusion practices
- Collection and analysis of demographic data on student participation
- Tracking of completion rates across different student cohorts
- Regular surveys of student experiences regarding inclusivity and cultural safety

### Continuous Improvement

- Annual review of this policy in consultation with diverse stakeholders
- Implementation of improvement strategies based on monitoring data
- Regular benchmarking against industry best practices

- Integration of feedback from First Nations communities and other stakeholder groups

## DOCUMENTS

- Disability Standards for Education 2005 (formulated under the Disability Discrimination Act 1992)
- Australian Quality Training Framework (AQTF) Essential Conditions
- AQTF Essential Conditions and Standards for Continuing Registration
- Standards for Registered Training Organisations 2025
- Student Support Policy
- Reasonable Adjustment Guide
- Trainer Handbook
- Student Handbook
- Student Special Needs Form
- Reasonable Adjustment Plan.
- Cultural Safety Guidelines
- Diversity and Inclusion Action Plan
- Staff Cultural Competence Framework
- Guide Quality Area 2 - Training Support, Diversity and Inclusion, Wellbeing

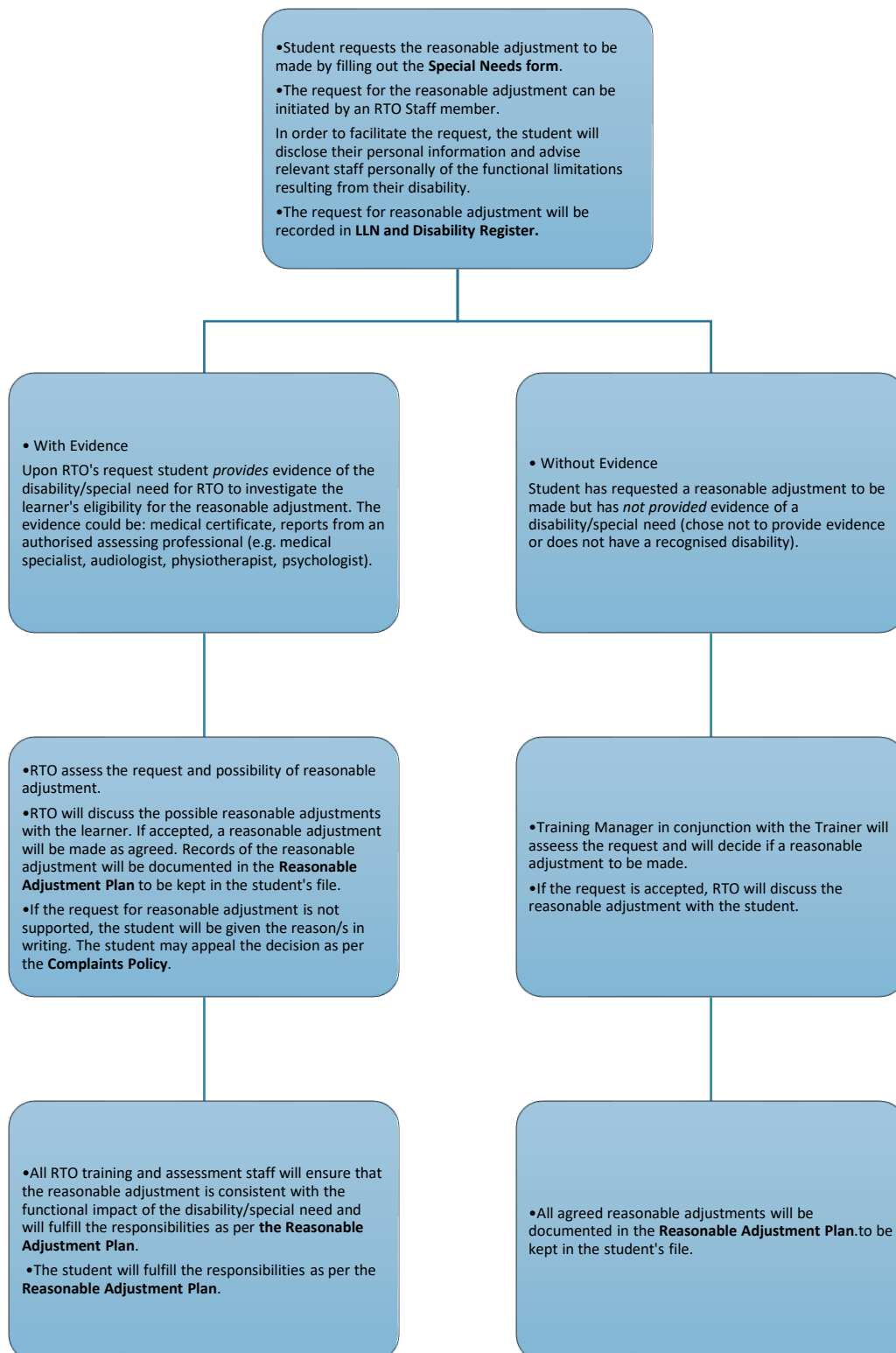
## ENDORSEMENT / REVISION NOTES

Approved by: Executive Director – Education & Training

Name: Jegath Jisangar

Approved date: 12/03/2026

## ADDENDUM A. REASONABLE ADJUSTMENT FLOWCHART



## ADDENDUM B. CULTURAL SAFETY IMPLEMENTATION GUIDELINES

### **First Nations Engagement Framework**

- Protocols for respectful engagement with local First Nations communities
- Guidelines for incorporating First Nations perspectives in curriculum
- Procedures for consultation on cultural matters

### **Staff Cultural Competence Development Plan**

- Mandatory cultural awareness training schedule
- Ongoing professional development requirements
- Assessment criteria for cultural competence

### **Inclusive Environment Checklist**

- Physical space assessment criteria
- Digital platform accessibility standards
- Materials and resources diversity audit guidelines