

POLICY & PROCEDURE

REASONABLE ADJUSTMENT

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1. Purpose

- 1.1 The purpose of this Policy is to ensure individuals with a disability are provided with the same learning opportunities as students without a disability and the same opportunity to perform and complete assessments as those without a disability, while maintaining the quality of the training program through the use of reasonable adjustment.

2. Scope

- 2.1 This policy relates to Allens Training Pty Ltd RTO 90909, its trainers and assessors and employed staff. It includes any third party providing services on behalf of the RTO, including their trainers and assessors and administration staff. It also covers students of the RTO and third party providers.

3. Policy Statement

- 3.1 Allens Training and/or their approved third party training providers must provide equitable access to all required educational and support services, so that no student is disadvantaged regardless of their mode of study or location. Where there may be limitations regarding access to these resources, Allens Training and/or their third party training providers will provide clear advice in pre-enrolment information or as early as practicable so all clients can make an informed choice about which RTO and course of study best meets their needs.
- 3.2 Under the Disability Standards for Education 2005, education providers must make reasonable adjustments for people with a disability, to the maximum extent that those adjustments do not cause the education provider unjustifiable hardship.
- 3.3 Allens Training and/or the approved third party training providers delivering training on their behalf treat every case relating to reasonable adjustment individually.
- 3.4 Students may require reasonable adjustment to support their learning and/or assessment activity in a range of situations, which may include but not be limited to:
- a) Physical disability or impairment
 - b) Mental disability or impairment
 - c) Medical condition/s
 - d) Other issues that may impact on learning and/or assessment
- 3.5 Disclosure of a disability is the choice of the student and is not a requirement for participation in a VET course or non-accredited course. Prospective or existing students can disclose any disabilities, specific support requirements or reasonable adjustment needs:
- a) By contacting Allens Training or their approved third party trainer provider prior to enrolment;
 - b) On enrolment by completing the enrolment process; or
 - c) By speaking with their trainer/training provider
- 3.6 Reasonable adjustment strategies and services may include:
- a) Provision of learning materials in alternative formats
 - b) Adjustments to assessment methods and assessment tools, including:
 - Collection of alternative evidence (such as audio and video); and
 - The provision of assessment in different formats
 - c) Personal support services, such as:
 - Writing
 - Reading
 - Interpreters
 - Specialist support people or services
 - Access to adaptive technology or special equipment; and
 - Modification to communication systems or information provision
- 3.7 A proposed reasonable adjustment to a course or assessment will be discussed with the student and identified support persons (where appropriate) to ascertain whether the proposed adjustment will meet their specific learning and/or assessment needs.
- 3.8 Any changes or modifications to courses and assessment will be managed in a way that maintains the integrity of the course and the qualification. Allens Training when considering reasonable adjustment will ensure that the training package requirements and assessable outcomes are maintained and will not make changes to any accredited or non-accredited courses which would undermine the integrity of the course.

- 3.9 Any additional costs or costs to be borne by the student associated with providing the student reasonable adjustment or specialised support will be discussed with the student before implementation.
- 3.10 Where it is determined that a course is not suitable for a student, Allens Training will offer support to the student about alternative training options available.

4. Procedures

Staff responsibility

- 4.1 Allens Training staff and their approved third party training providers embrace the responsibility of ensuring that all personnel acquire the knowledge and skills to relate to students without direct or indirect discrimination.
- 4.2 All personnel should be aware of and know how to use available internal and external resources or be able to confidently refer students to appropriate tutoring and community support service if required. All personnel are required to continue to expand their knowledge or access and equity issues through induction processes when joining Allens Training, and in structured professional development on a regular basis (at least annually) in access and equity issues and resources.

When considering reasonable adjustment

- 4.3 In assessing whether an adjustment to the course or program in which the student is enrolled, or proposes to be enrolled, is reasonable, Allens Training and/or their third party training providers are entitled to maintain the vocational outcome and requirements of the course or program, and other requirements or components that are inherent in or essential to its nature. *The integrity of the course must never be undermined.*
- 4.4 Proposed changes or considerations that will significantly impact the RTO will be discussed with the General Manager of Regulatory Compliance and the CEO before implementation.

Examples of Reasonable Adjustments

Type of disability or disadvantage	Example of reasonable adjustments
Mobility impairment	Provision of wheelchair accessibility; access to aids such as for holding documents, adjustable tables, note taking support, oral rather than written presentations or exams, use of personal computer, lifting limits, cushions for support when kneeling on the floor to perform CPR skills.
Vision impairment	Use of audio recordings, enlarged text and images, enlarged computer screen images; closed captioning in online learning; use of voice synthesisers on computers; good lighting or reading lamps; braille translations; provision for guide dogs; avoid moving furniture without informing the person; provision of additional writing time for assignments/tests.
Hearing impairment	Use of teletext; audio loops for individuals using hearing aids; use of Plain English documents; sign language interpreters for training and assessment.
Intellectual disability	Practical learning sessions; repetition of learning exercises; use of Plain English; use of mentors for support; assessment that is appropriate to the skill i.e., avoiding written test for practical tasks; provision of additional time to complete assessment.
Individuals with acquired brain injury	Provision of time and patience during training and assessment; use of reflective listening skills; provision of memory aids, e.g., posters, notes; minimisation of stress.
Psychiatric disability	Use of reflective listening skills; identification and avoidance of stresses; use of ongoing rather than formal assessments; providing 'time-out' breaks in assessment.
Speech impairment	Provision of learning materials, texts and handouts ahead of the class; modify the presentation medium for example, visual, oral, print, demonstration; provision of practice opportunities; use of generic, inclusive terms when constructing learning activities; substitution of alternative tasks where existing ones pose a problem; extend or modify

	timeframes for assessment; ensure the language of assessment instruments does not create barriers; provision of customised delivery schedule, provision of one on one coaching sessions.
Mature age	Provision of customised delivery schedule; one-on-one coaching sessions; extend or modify timeframes for assessment; use of paper-based resources; face to face training sessions or courses; use of phone communication as a preferred method to email.
Aboriginal and/or Torres Strait Islander	Provision of customised delivery schedule; one on one coaching sessions; extend or modify timeframes for assessment; use of paper based resources; use of phone communication as preferred method; provision of learning materials, texts and handouts ahead of class; modify presentation medium for example, visual, print, oral, demonstration; provide practice opportunities; use of generic, inclusive terms when constructing learning activities; use of culturally appropriate materials and resources; use of local community liaisons as a support person.
Low socio – economic background	Provision of customised delivery schedule; one on one coaching sessions; extend or modify timeframes for assessment; use of paper based resources; use of phone communication as preferred method; provision of learning materials, texts, and handouts ahead of class; modify presentation medium for example, visual, print, oral, demonstration; provide practice opportunities; use of generic, inclusive terms when constructing learning activities.

Consulting the student

- 4.5 Before Allens Training and/or their approved third party training provider makes an adjustment for a student, the student, and their support person (if required) is consulted about:
- Whether the adjustment is reasonable;
 - The extent to which the adjustment would achieve the aims in relation to the student; and
 - Whether there is any other reasonable adjustment that would be less disruptive and intrusive and no less beneficial for the student

Deciding on an adjustment to be made

- 4.6 In deciding whether to make a particular reasonable adjustment for a student, Allens Training and/or their approved third party training provider:
- Assesses whether this any other reasonable adjustment that would be less disruptive and intrusive and no less beneficial for the student
 - Assesses whether the adjustment may need to be changed over the period of a student's education or training.

A detailed assessment, which might include an independent expert assessment, may be required to determine what adjustments are necessary for a student. The type and extent of the adjustments may vary depending on the individual requirements of the student and other relevant circumstances. Multiple adjustments may be required and may include multiple activities.

Assessing reasonable adjustments

- 4.7 In assessing whether a particular adjustment is reasonable for the student with a disability, Allens Training and/or their approved third party training provider considers:
- The nature of the student's disability
 - The information provided by, or on behalf of, the student about how the disability affects the student's ability to participate;

- c) Views of the student, or a support person of the student, about whether a proposed adjustment is reasonable and will enable the student with a disability to access and participate in education and training opportunities on the same basis as students without disabilities;
- d) Information provided by, or on behalf of, the student about his or her preferred adjustments
- e) The effect of the proposed adjustment on the student, including the student's ability to participate in courses or programmes and achieve learning outcomes;
- f) The effect of the proposed adjustment on anyone else affected, including Allens Training's operations, personnel, third party provider and other students; and
- g) The costs and benefits of making the adjustment.

4.8 In making a reasonable adjustment, Allens Training ensures that the integrity of the course or program and assessment requirements and processes are maintained. Allens Training and/or approved third party training providers acts upon information about an adjustment in a timely way that optimises the student's participation in education or training. In meeting its obligations to provide reasonable adjustments, Allens Training and/or approved third party trainer provider may provide an alternative adjustment to the student's preferred form of adjustment if the alternative is effective in achieving the desired purpose.

IMPORTANT TO NOTE: It is important to note that the HLTAID competency standards do require a level of physical ability to meet the evidence requirements for assessment. These standards relate to the level of performance required to provide resuscitation and respond to an emergency situation where there may be risk to life.

"Due to the potential risk to health and safety where a nominated first aider, or worker with duty of care, does not have the ability to perform resuscitation and/or first aid to the performance standard, it is not appropriate to issue a Statement of Attainment to students who are physically unable to meet the assessment requirements".

4.9 All notes, records and evidence reviewed when assessing reasonable adjustment must be maintained in the student's training desk profile.

Unjustifiable hardship

4.10 Once a reasonable adjustment has been determined, Allens Training adjustment may consider if the adjustment would impose unjustifiable hardship on its operations. In determining what constitutes unjustifiable hardship, all relevant circumstances of the case are considered including:

- a) The nature of the benefit or detriment likely to accrue or be suffered by any persons concerned; and
- b) The effect of the disability of a person concerned; and
- c) The financial circumstances and the estimated amount of expenditure required to be made to support the person requiring reasonable adjustment.

4.11 In determining whether unjustifiable hardship applies, Allens Training:

- a) Considers information about the nature of the student's disability, his or her preferred adjustment, any adjustments that have been provided previously and any recommended or alternative adjustments. This information may be provided by the student, a support person of the student or independent experts (or a combination of those persons);
- b) Ensures that timely information is available to the student, or a support person of the student about the processes for determining whether the proposed adjustment would cause unjustifiable hardship; and
- c) Ensures that these processes maintain the dignity, respect, privacy and confidentiality of the student and the support persons of the student, consistent with the rights of the rest of the community.

4.12 Where a claim of unjustifiable hardship is made, Allens Training has considered all the financial and other resources that are reasonably available for the purpose of making any necessary adjustments for the student, and the impact of those adjustments on its capacity to provide education of high quality to all students while remaining financially viable.

- 4.13 Allens Training considers all costs and benefits both direct and indirect that are likely to result, the student and any support persons of the student, and any other persons in the learning or wider community, including:
- a) Costs associated with additional personnel, the provision of special resources or modification of the curriculum;
 - b) Costs resulting from the student's participation in the learning environment, including any adverse impact on learning and social outcomes for the student, other students, and teachers; and
 - c) Benefits deriving from the student's participation in the learning environment, including positive learning and social outcomes for the student, other students and teachers, and any financial incentives, such as subsidies or grants, available to the provider because of the student's participation.
- 4.14 Where Allens Training decides to rely on unjustifiable hardship, it ensures that a notice stating the decision and the reason for the decision is given to the student, or a support person of the student, as soon as practicable after the decision is made.
- 4.15 All records, notes and supporting evidence in this process must be maintained in the student's training desk profile.

Implementing reasonable adjustments

- 4.16 Allens Training and/or their third party training providers take all reasonable steps to ensure that any adjustment required to be made is made within a reasonable time. Whether the time is reasonable depends, in particular, on whether and when the student or his support person has provided:
- a) In a timely way, any relevant information in the possession of the student or associate about how the disability affects the student in relation to education or training; and
 - b) The student's or the support person's opinion about the matter.
- 4.17 Where reasonable adjustments are implemented, a detailed training and assessment plan including schedules, notes regarding the required adjustments and any related communications regarding the adjustments must be maintained in the student's training desk profile.
- 4.18 Any adjustment to the agreed implementation of reasonable adjustment must be escalated to the General Manager for Regulatory Compliance as soon as practicable.

5. Responsibilities

Approving the implementation of Reasonable Adjustments

- 5.1 The General Manager of Regulatory Compliance is responsible for the review of reasonable adjustment requests where the reasonable adjustment would financially impact the RTO and will be responsible to keep the CEO informed throughout the process.

Compliance, monitoring and review

- 5.2 The General Manager of Regulatory Compliance is responsible for implementing, reviewing, monitoring, and ensuring compliance with this policy.

Reporting

- 5.3 No additional reporting is required.

Records management

- 5.4 Employees must maintain all records in Training Desk relevant to administering this policy securely.

6. Definitions

Terms and definitions

Assessment – The process of collecting evidence and making judgements on whether competency has been achieved, to confirm that an individual can perform to the standard required in the workplace, as specified in a training package or VET accredited course.

Reasonable adjustment – Term applied to modifying the learning environment or making changes to the training and assessment delivered to assist a student with a disability.

7. Related Legislation & Documents

[Standards for Registered Training Organisations \(RTOs\) 2015](#)

[National Vocational Education and Training Regulator Act 2011](#)

[Commonwealth Disability Discrimination Act 1992](#)

[Commonwealth Disability Standards for Education 2005](#)

[Privacy Act 1988](#)

8. Policy Framework

- 8.1 The Disability Discrimination Act (1992) requires educational providers to put in place actions to help ensure equal opportunity for people with a disability. Under the Disability Standards for Education 2005, education providers must make reasonable adjustments for people with a disability, to the maximum extent that those adjustments **do not cause that education provider unjustifiable hardship**. The rights of students and requirements of the RTO are summarised as:

Rights	Requirements
Enrolment	
Right to seek admission and enrol on the same basis as prospective learners without a disability including the right to reasonable adjustments.	Take reasonable steps to ensure that the enrolment process is accessible. Consider learners with disability in the same way as learners without disability when deciding to offer a course place. Consult with prospective learners or their support person about the effect of the disability on their ability to seek enrolment, and any reasonable adjustments necessary. Provide clear information and referral where the RTO has determined that the student will not successfully meet the course requirements, or the RTO cannot provide the required reasonable adjustment and support.
Participation	
Right to access courses and programs; use services and facilities; and have reasonable adjustments, to ensure learners with disability are able to participate in education and training on the same basis as learners without disability.	Take reasonable steps to ensure participation. Consult with the learner or their support person about the effect of the disability on their ability to participate. Make a reasonable adjustment if necessary. Repeating this process over time as necessary.
Training development, accreditation and delivery	
Right to participate in courses that are designed to develop their skills, knowledge and understanding, on	Enable students with disability to participate in learning experiences (including assessment and

the same basis as students without disability and to have reasonable adjustments to ensure they are able to participate in education and training.	certification). Consult with the student or their support person. Take into consideration whether the disability affects the student's ability to participate in the training experiences.
Student support services	
Right to access student support services provided by education providers, on the same basis as learners without disability. Students with a disability also have the right to specialised services needed for them to participate in the educational activities for which they are enrolled.	Ensure that students with disability are able to use general support services. Ensure that students have access to specialised support services or are referred to specialised support services. Ensure students are aware of any additional costs associated with any referrals or external support services arranged.
Harassment and victimisation	
Right to education and training in an environment that is free from discrimination caused by harassment and victimisation on the basis of their disability.	Implement strategies to prevent harassment or victimisation. Take reasonable steps to ensure that staff and students are informed about their obligation not to harass or victimise students with disability. Take appropriate action if harassment or victimisation occurs. Ensure complaint mechanisms are available to students.

9. Feedback

9.1 Feedback about this document can be emailed to compliance@allenstraining.com.au.

10. Approval and Review Details

Approval Authority			Next Review Date
CEO			June and December of each year
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Draft	7.12.22	Ferne Robinson	Initial draft for review by CEO
V1.0	12.12.22	Ferne Robinson	Implementation of V1.0