The updated [*Training Package Products Development and Endorsement Process Policy*](https://www.dewr.gov.au/skills-support-individuals/resources/training-package-products-development-and-endorsement-process-policy) *(TPPDEPP)* (effective January 2023) has a new requirement that *“an assessment that demonstrates that the training product meets anti-discrimination legislation, and associated standards and regulations has been undertaken, including the Disability Standards for Education 2005.1”* This is referred to as an Anti-Discrimination Assessment (ADA) and is included as part of the training package product submission pack to the Training Package Assurance Body (TPAB).

This Anti-Discrimination Assessment document describes the processes to be followed and considerations that must be made during a training package product project to ensure that:

* the methods and processes used to engage and consult with stakeholders and to receive feedback from them have been inclusive
* the content of products that are reviewed and developed do not discriminate in their language, and take into consideration any requirements in the products that may discriminate
* where possible, experts have been engaged to address any potential concerns related to meeting anti-discrimination requirements.

Further information is included below.

**Checklist**

The document also includes a checklist where project managers and developers must describe the actions taken and considerations made to meet anti-discrimination requirements during their project. Each project will have an allocated ADA assessor who will then check that the processes have been properly followed by reviewing the responses in the checklist and reviewing final draft products to check these requirements have been met.

A tracking document has been created to facilitate capturing feedback from the Assessor and responses from the Project Manager during the assessment process. This checking document should be included in the Submission Pack along with the final completed Assessment.

*1 Training Package Products Development and Endorsement Process Policy,* Section 5.1 Submission of draft training products to the Assurance Body, detail 13.

Purpose and application

Training products should incorporate contemporary language, for example, people/person with a disability, rather than special or additional needs, consider how the delivery of training may be supported through reasonable adjustments when creating assessment requirements, particularly performance evidence, and consider what terms are appropriate for their sector i.e., client, person, individual.

The anti-discrimination assessment (ADA) should consider the following (noting this is not an exhaustive list of considerations):

* the design of packaging rules that reduce disadvantage by providing a range of elective choices
* the inclusion of multiple entry and exit points to promote flexibility and increase access for a broad range of individuals
* whether the products limit unnecessary references to location to allow access by people in regional and remote areas
* whether the products limit the use of pre-requisites thereby limiting barriers to entry
* how foundation skills have been described and/or whether they are explicit in the products, and whether they reflect the foundation skills required for the vocational outcome
* whether the products use inclusive language
* whether the products have eliminated discriminatory language
* whether the products indirectly discriminate against a protected attribute\*. (The *Age Discrimination Act 2004, Disability Discrimination Act 1992 and Sex Discrimination Act 1984* specific areas where it is unlawful to discriminate.)

*\*The protected attributes broadly cover discrimination including race, colour, sex, sexual orientation, gender identity, relationship status, religion, age and disability (physical, intellectual, psychiatric, sensory, neurological or learning disability).*

The process on the following pages outlines some of the ways to avoid discriminatory language and tasks.

Information for project managers

Project managers (PM) should refer to and complete this document from the beginning of the project and through to its submission.

Prior to the review of existing products, take note of any language which exists that may be considered discriminatory or where reasonable adjustments may not be possible.

During the review period, consultation with stakeholders should include discussion about any problematic areas and an explanation given about the importance of the type of language which should be used and how reasonable adjustment can be included in the products.

All products must be checked against the requirements of the current legislation before signing the ADA checklist.

Once completed, it is to be checked and signed off by the ADA assessor.

This information is to be submitted in conjunction with the final submission package.

Information for training package product developers

The developer is to determine if the content of each product contains requirements that may be considered discriminatory. While it is preferred that requirements are not too prescriptive, care should also be taken about being too generic.

Non-discriminatory language is crucial especially in the areas of Foundation Skills, Performance Criteria, Performance Evidence and Assessment Conditions. Consideration should be given to:

* Foundation Skills – specifically ‘Oral Communication’. Is it critical to include? Consider someone who may be nonspeaking. Using this skill may be considered discriminatory.
* Performance Criteria and Performance Evidence – care should be taken to ensure that requirements in these areas are not too prescriptive. What is essential in the performance of the job role? Can reasonable adjustments be made?
* Assessment Conditions – are the requirements too specific? Can reasonable adjustments be made? Does the prescribed location prevent a person being able to complete the unit of competency, skill set or qualification? What alternatives can be included? For example, can the assessment be simulated or contextualised?
* Other areas to be discussed during stakeholder consultation should be prerequisites and entry requirements. Are they necessary and could they exclude an individual from completing the qualification, skill set or unit of competency?

Relevant documentation and requirements

| DOCUMENT | SECTION | ADA REQUIREMENTS |
| --- | --- | --- |
| TPPDEPP | Step 2.2  Step 3.1  Step 5.1 | Undertake consultations  Determine revisions  Submission of draft training products to the Assurance Body – Compliance with requirements |
| Training Product Submission form | 5.2 – Vulnerable and Minority Cohorts | This section of the submission requires a description of how the consultation addressed the needs of vulnerable or minority cohorts. It should include women, people with disability, culturally and linguistically diverse communities, and First Nations people. This includes a description of how the method, location and timing of consultation activities supported engagement.  This section must be completed regardless of changes to the strategy over time. |
| [Age Discrimination Act 2004](https://www.legislation.gov.au/Details/C2020C00283) | Part 1 – Preliminary. S4. Simplified outline  Part 4 – Unlawful age discrimination etc. S.26 Education | Direct discrimination – treating a person less favourably in situations where age should not be considered  Indirect discrimination – imposing a condition, requirement or practice which is unreasonable and likely to disadvantage  It is unlawful to discriminate against a person on the ground of the person’s age:   * By refusing to accept the person’s application as a student * By denying the person access to any benefit provided by the educational authority (the body administering and educational institution) * Schedule 1 Laws for which an exemption is provided -https://www.austlii.edu.au/cgi-bin/viewdoc/au/legis/cth/consol\_act/ada2004174/sch1.html |
| [Disability Discrimination Act 1992](https://www.legislation.gov.au/Details/C2023C00355) | S4  S 5 and 6 | The definition of disability in the DDA can be found in section 4 of the Act. Disability in relation to the DDA includes:   * Physical * Intellectual * Psychiatric * Sensory * Neurological, and * Learning disabilities, as well as * Physical disfigurement.   These sections set out the types of conduct that will constitute direct and indirect disability discrimination. Direct disability discrimination is when a person with disability is treated less favourably than a person without disability   * because of the disability, and * in circumstances that are not materially different.   Indirect disability discrimination occurs when a person with disability:   * is required to comply with a requirement or condition but they cannot comply because of their disability, and * that requirement or condition is not reasonable in the circumstances. * a failure to make reasonable adjustments to assist the person with disability to meet requirements or conditions |
| [Sex Discrimination Act 1984](https://www.legislation.gov.au/Details/C2023C00316) | S 5, 6 and 7 | The Sex Discrimination Act 1984 (Cth) (‘SDA’) covers discrimination on the ground of:   * sex (defined in s 5); * marital status (defined in s 6); * pregnancy or potential pregnancy (defined in s 7); and * family responsibilities (defined in s 7A) |
| [Racial Discrimination Act 1975](https://www.legislation.gov.au/Details/C2022C00366) |  | The Act makes it unlawful to discriminate against a person because of his or her race, colour, descent, national origin or ethnic origin, or immigrant status.  Direct discrimination happens when a person is treated less favourably than another person in a similar situation because of his or her race, colour, descent, national or ethnic origin or immigrant status.  Indirect discrimination can happen when employers or service providers put in place conditions, requirements or practices which appear to treat everyone the same, but which disadvantage some people because of their race, colour, descent, national or ethnic origin or immigrant status. If the requirement is not reasonable regarding the circumstances of the case, it could be indirect discrimination. |

Anti-discrimination assessment checklist

**Project title:**

**Project scope:**

| Checklist Item | Project manager response and evidence | ADA assessor Response  (insert comments where necessary) |
| --- | --- | --- |
| 1. Have the packaging rules been designed to reduce disadvantage?  *For example, the range of elective choices.* | * YES   *How?* * There are no entrance requirements * There are four options for specialisation, including a general qualification designed specifically to be open to a range of applicants including administration staff.   NO   *Why not?*  NOT APPLICABL*E*  *Why?* | Has this requirement been adequately considered?  YES  NO |
| 2. Have pre-requisites or entry requirements been limited to promote flexibility and increase access for a broad range of individuals? | YES   *How?*  NO   *Why not?*  NOT APPLICABL*E*  *Why?*   * There are no entrance requirements | Has this requirement been adequately considered?  YES  NO  NOT APPLICABL*E* |
| 3. How have Performance Criteria, Foundation Skills, Performance Evidence and Assessment Conditions been considered with respect to anti-discrimination? | Performance Criteria sentence structure has been simplified to be direct and clear.  Foundation Skills have been edited. E.g. Oral communication now reads, *‘Respond to questions and clarify information’* in place of ‘*Participate in verbal exchanges to respond to questions and clarify information’*  Numeracy has been edited to be more specific for the task of each unit e.g. AHCLSK225 used to read ‘*Calculate and record routine workplace data*  *Use basic mathematical processes of addition, subtraction, division, multiplication, percentages, decimal points and ratios’.* This now reads *‘Interpret basic numerical measurements and quantities as required for the identification and marking of livestock’.*  Assessment Conditions are appropriate for each individual unit of competency. | Has this requirement been adequately considered?  YES  NO |
| 4. Do the products use contemporary language?  *For example, using people with a disability rather than ‘special needs’ or ‘additional needs’, using nonspeaking instead of nonverbal. Avoidance of acronyms like ‘ATSI’.* | YES  *How?* All language is neutral, the components within this project did not require specific mention of things such as *‘people with a disability’.*    NO   *Why not?* | Has this requirement been adequately considered?  YES  NO |
| 5. Do the products limit unnecessary references to location, enabling access by people in regional and remote areas? | YES   *How?* There is no mention of location. This project contains AHCLSK units of competency. Components within this project are likely to be used in rural, remote and regional areas as well as in cities.  NO   *Why not?* | Has this requirement been adequately considered?  YES  NO |
| 6. How have protected attributes been considered in the development of the training products?  *For example, ensuring products do not indirectly discriminate against a protected attribute.* | All products have been developed in consideration of protected attributes and inclusive or generic language has been used where necessary. | Has this requirement been adequately considered?  YES  NO |

**Declaration**

This Anti-discrimination assessment has been completed by Ms Susie Falk of Skills Insight. The assessor, Ms Cathy Beven of Skills Insight is satisfied by the information provided by the project manager and the products reviewed that the training products being submitted meet, as far as practicable, relevant anti-discrimination legislation, and that evidence of processes to address, (such as avenues to raise concerns is encouraged) is reasonable and adequate.

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Description automatically generated

Signature:

Date: 24 September 2024

Training products provided for assessment

Qualifications

AHC33324 Certificate III in Feedlot Operations

Units of competency

|  |  |
| --- | --- |
| AHCBAC318 Release 1 | Maintain pastures and crops for livestock production |
| AHCBUS302 Release 1 | Use portable technology in the workplace |
| AHCHYD303 Release 1 | Implement a maintenance program for hydroponic systems |
| AHCHYD304 Release 1 | Install hydroponic systems |
| AHCHYD502 Release 1 | Develop a plan for a hydroponic system |
| AHCLSK103 Release 1 | Support livestock work |
| AHCLSK103 Release 1 | Support livestock work |
| AHCLSK221 Release 1 | Assist with feeding in a production system |
| AHCLSK222 Release 1 | Care for health and welfare of livestock |
| AHCLSK223 Release 1 | Carry out regular livestock observation |
| AHCLSK224 | Handle livestock using basic techniques |
| AHCLSK225 Release 1 | Identify and mark livestock |
| AHCLSK226 Release 1 | Load and unload livestock |
| AHCLSK227 Release 1 | Monitor water supplies |
| AHCLSK228 Release 1 | Muster and move livestock |
| AHCLSK229 Release 1 | Provide feed for livestock |
| AHCLSK230 Release 1 | Clean out production sheds |
| AHCLSK231 Release 1 | Maintain production growing environments |
| AHCLSK232 Release 1 | Carry out alpaca handling and husbandry operations |
| AHCLSK233 Release 1 | Clean and maintain livestock pens |
| AHCLSK234 Release 1 | Apply animal welfare principles to handling and husbandry of livestock |
| AHCLSK235 Release 1 | Ride educated horses to carry out basic stock work |
| AHCLSK236 Release 1 | Handle horses safely for stock work |
| AHCLSK237 Release 1 | Brand livestock |
| AHCLSK344 Release 1 | Administer treatments to livestock |
| AHCLSK345 Release 1 | Carry out feedlot operations |
| AHCLSK346 Release 1 | Carry out post-mortem examination of livestock |
| AHCLSK347 Release 1 | Maintain livestock water supplies |
| AHCLSK348 Release 1 | Coordinate and monitor production performance |
| AHCLSK349 Release 1 | Euthanase livestock |
| AHCLSK350 Release 1 | Identify and draft livestock |
| AHCLSK351 Release 1 | Implement animal health control programs |
| AHCLSK352 Release 1 | Implement feeding plans for intensive livestock production |
| AHCLSK353 Release 1 | Implement feeding plans for livestock |
| AHCLSK354 Release 1 | Monitor livestock production growing environments |
| AHCLSK355 Release 1 | Prepare and present livestock for competition |
| AHCLSK356 Release 1 | Exhibit livestock |
| AHCLSK357 Release 1 | Rear newborn and young livestock |
| AHCLSK358 Release 1 | Slaughter livestock |
| AHCLSK359 Release 1 | Coordinate and monitor livestock transport |
| AHCLSK360 Release 1 | Service and repair bores and windmills |
| AHCLSK361 Release 1 | Transport farm produce or bulk materials |
| AHCLSK362 Release 1 | Maintain and monitor feed stocks |
| AHCLSK363 Release 1 | Care for and train working dogs |
| AHCLSK364 Release 1 | Castrate livestock |
| AHCLSK365 Release 1 | Mix and mill standard stockfeed |
| AHCLSK366 Release 1 | Collect, store and administer colostrum |
| AHCLSK367 Release 1 | Remove and facilitate reuse of effluent and manure from an intensive production system |
| AHCLSK3X25 Release 1 | Comply with industry animal welfare requirements |
| AHCLSK369 Release 1 | Monitor animals in intensive production systems |
| AHCLSK370 Release 1 | Monitor pen condition and ration suitability |
| AHCLSK371 Release 1 | Plan, prepare and conduct mulesing procedures |
| AHCLSK372 Release 1 | Train, care for and ride horses for stock work |
| AHCLSK340 Release 2 | Mate and monitor reproduction of alpacas |
| AHCLSK403 Release 1 | Develop feeding plans for an intensive livestock production system |
| AHCLSK423 Release 1 | Develop feeding plans for livestock |
| AHCLSK424 Release 1 | Implement and monitor animal welfare programs |
| AHCLSK425 Release 1 | Implement intensive production systems |
| AHCLSK426 Release 1 | Oversee animal marking operations |
| AHCLSK427 Release 1 | Plan and monitor intensive production systems |
| AHCLSK428 Release 1 | Supervise animal health programs |
| AHCLSK429 Release 1 | Supervise feedlot operations |
| AHCLSK430 Release 1 | Arrange livestock purchases |
| AHCLSK431 Release 1 | Design livestock handling facilities |
| AHCLSK432 Release 1 | Arrange transport for farm produce or livestock |
| AHCLSK433 Release 1 | Escort livestock during export |
| AHCLSK434 Release 1 | Manage horses for stock work |
| AHCLSK511 Release 1 | Manage livestock production |
| AHCLSK512 Release 1 | Arrange marketing of livestock |
| AHCLSK513 Release 1 | Develop livestock health and welfare strategies |
| AHCLSK514 Release 1 | Design livestock effluent systems |
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| AHCNRM513 Release 1 | Manipulate and analyse data within geographic information systems |
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| AHCWRK606 Release 1 | Monitor projects in a program |