Anti-discrimination assessment process and checklist – AFP_ANN_2324_002

The updated *Training Package Organising Framework (TPOF)* (effective July 2025) has a requirement under the Qualification Development Quality Principles that "*Qualifications and Units of Competency are informed by learners' needs and aspirations, enabling individuals to adapt to changing job roles and workplaces and transition across occupations and industries. [1]*"

Further, Quality Principle 1.2 states "*Qualifications support the diversity of learners' needs and aspirations*" and the guidance notes discusses the way in which this is demonstrated is providing evidence that "*An assessment has been undertaken that demonstrates that a training package product meets anti-discrimination legislation and associated standards and regulations including the Disability Standards for Education 2005.*"

This is referred to as an **Anti-Discrimination Assessment (ADA)** and is required as part of the training package product submission pack to the Training Package Assurance Body (TPAB).

This ADA 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

This document is used as 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. This checking document should be included in the Submission Pack. Please ensure that all products which have been developed are included in the checklist.

[1] Quality Principle 1

Tracking document

A tracking document has been created to facilitate capturing feedback from the Assessor and responses from the Project Manager **during** the assessment process. The document should be utilised from the beginning of the project to assist in populating the checklist which is to be submitted. The Training Product Developer should also be aware of the tracking document so they can ensure the products are non-discriminatory.

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
Training Package Assurance Submission Compliance Guide Supporting TPOF 1 July 2025	Step 2.2	Undertake consultations
	Step 3.1	Determine revisions
	Step 5.1	Submission of draft training products to the Assurance Body – Compliance with requirements
Training Product Submission form	Section 2.9 – 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 "*vulnerable or minority stakeholders were identified and how consultation activities were tailored to respond to the needs of those stakeholders.*" This section must be completed regardless of changes to the strategy over time.
	Section 2.19 – Anti-Discrimination Assessment	This section requires you to upload this copy of the Anti-Discrimination Assessment
Age Discrimination Act 2004	Part 1 – Preliminary. S4. Simplified outline	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:
	Part 4 – Unlawful age discrimination etc. S.26 Education	• 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	S4	The definition of disability in the DDA can be found in section 4 of the Act. Disability in relation to the DDA includes: • Physical

DOCUMENT	SECTION	ADA REQUIREMENTS
		• Intellectual • Psychiatric • Sensory • Neurological, and • Learning disabilities, as well as • Physical disfigurement.
	S 5 and 6	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	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		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: AFP_ANN_2324_002.Cert II RuralOps

Project scope: Review and Revision of AHC 21216 Certificate II in Rural Operations

Checklist Item	Project manager response and evidence	ADA assessor Response (insert comments where necessary)
1. Was input from stakeholders representing vulnerable and minority groups obtained during consultation?	YES ☒ During Technical Committee meetings, Broad Consultation and Consensus Gathering phases stakeholders were specifically asked about their cohorts and how the qualification may impact them. Concerns were raised with respect to the name of the qualification. It was thought that the name did not adequately represent all LGAs so a survey was conducted to determine an appropriate name for the qualification. There are several priority cohorts who utilise the qualification including First Nations communities, youth and incarcerated individuals. All were represented during the consultations – at either Broad Consultation and/or Consensus Gathering workshops.	Has this requirement been adequately considered? YES ☒ NO ☐ Communication with the developer confirmed that 'Workshops were attended by First Nations people as well as RTOs who deliver to at risk youth and incarcerated individuals'.
2. Have the packaging rules been designed to reduce disadvantage?	YES ☒ The packaging rules have now been designed so there are two core units and ten elective units. The total number of units required in the current AHC21216 qualification is 15 i.e. three core units and twelve elective units. Stakeholders agreed that this reduction provides sufficient breadth and	Has this requirement been adequately considered? YES ☒ NO ☐

Checklist Item	Project manager response and evidence	ADA assessor Response (insert comments where necessary)
For example, the range of elective choices.	depth of skills and knowledge to achieve the qualification outcome while offering flexibility for specialisation or a broad range of skills and knowledge across different industry sectors and workplace contexts.	The qualification includes an extensive range of electives for packaging a qualification outcome for a range of employer/industry specific purposes or individual needs including enabling up to four unlisted units to be selected if required.
3. Have pre-requisites or entry requirements been limited to promote flexibility and increase access for a broad range of individuals?	NO ☒ Initially, attempts to reduce the number of prerequisites were deliberately made so there would only be one unit which required a prerequisite. However, once the initial draft went out to broad consultation there were many requests to include units of competency which do have prerequisites resulting in 13 units of competency which have prerequisite requirements. The number of prerequisites in the qualification should not, however, restrict an individual completing the qualification as they are from many different industry areas and unlikely to be selected by one individual.	Has this requirement been adequately considered? YES ☒ NO ☐ The qualification has no entry requirements, and no units are identified as requiring Mandatory Workplace Requirements (MWR) for assessment purposes. Units with prerequisites are all elective units, and the prerequisite units are included as electives to enable packaging should these units with prerequisites be selected. As per the developer evidence, units with prerequisites are from different industry sectors and multiple units across the widely varied sectors with prerequisites are unlikely to be selected in a targeted qualification outcome.
4. What equity or anti-discrimination considerations	NOT APPLICABLE ☒	Has this requirement been adequately considered? YES ☐

Checklist Item	Project manager response and evidence	ADA assessor Response (insert comments where necessary)
influenced the choice of unit template?		NO ☐ NOT APPLICABLE ☒
5. How does the unit design support equitable access and avoid discriminatory barriers in learning and assessment requirements across all components of the unit?	NOT APPLICABLE ☒	Has this requirement been adequately considered? YES ☐ NO ☐ NOT APPLICABLE ☒
6. 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 ☒ A User Guide has been developed for RTOs and references are made to Aboriginal and/or Torres Strait Islander people specifically in Section 2 when discussing assessment requirements. There are no other areas where contemporary language was used.	Has this requirement been adequately considered? YES ☒ NO ☐

Checklist Item	Project manager response and evidence	ADA assessor Response (insert comments where necessary)
7. Do the products limit unnecessary references to location, enabling access by people in regional and remote areas? *For example, ensuring there are no specific references to cities or urban areas*	YES ☒ The User Guide discusses the use of the term "Rural Operations" in the title of the qualification and the decision to continue its use as an established market identity. It also explains that including the term 'Primary Industries' in the title allows for the diversity of areas and industries where it is utilised as a pathway for further education.	Has this requirement been adequately considered? YES ☒ NO ☐ The rationale for the qualification title change is well articulated in the companion volume resources and removes potential barriers, in relation to the perception of the application of the qualification only in or for 'rural' locations.
8. 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.*	A qualification purpose matrix survey was conducted at the beginning of the consultation period to determine the target cohorts. This is a qualification which, historically, has been utilised for many purposes and in many areas of Australia and is a pathway for a variety of job roles. Careful consideration was taken to ensure this qualification remained diverse and flexible for any number of individuals wanting to complete the qualification.	Has this requirement been adequately considered? YES ☒ NO ☐

Declaration

This Anti-discrimination assessment has been completed by Maree Thorne. The assessor 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.

Signature:

MLThorne

Date: 27 July 2026

About the Assessor

Name: Maree Thorne

Relevant courses completed:

- Master of Learning Innovation
- Graduate Certificate of Education
- Diploma of Quality Auditing
- Diploma of Teaching
- Certificate IV in Training and Assessment

Relevant experience:

- 30 years' experience in vocational education, including as trainer/assessor, management and independent VET consultant
- Previously member of Training Package Quality Assurance Panel
- Training package product development including Qualification Reform project with Skills Insight
- Training and assessment resource development

Training products provided for assessment

Qualifications

AHC21227 Certificate II in Primary Industries and Rural Operations