

## Anti-Discrimination Assessment (ADA)

The **Anti-Discrimination Assessment (ADA)** is an essential part of the training package development process. It ensures training products are inclusive, comply with Australian anti-discrimination legislation, and do not unintentionally exclude vulnerable groups or individuals with disabilities. For more information, refer to *Appendix B - Relevant Anti-Discrimination Legislation*.

This assessment must be submitted along with the final assurance body training product submission pack.

Follow these steps to complete the ADA:

1. The project team should begin referring to this document at the start of the project and continue through to its final submission. This will ensure that anti-discrimination principles are considered and applied throughout the development process.
2. When reviewing existing products, technical writers must carefully examine the language used to identify any terminology that may be considered discriminatory. They must also evaluate whether reasonable adjustments can be made for inclusivity. This should proactively identify and address any problematic areas that could inadvertently exclude certain groups of learners, including those with disabilities.
3. During the project consultation, relevant stakeholders, including representatives from diverse and vulnerable groups, should be engaged to gather feedback on any discriminatory language or barriers to reasonable adjustment.
4. In preparation for the Assurance Body submission, the project manager and technical writers must carefully complete the ADA Assessment describing actions taken and considerations made to meet anti-discrimination requirements during the project.
5. The ADA assessor will review the training products and the responses in the assessment to ensure these requirements have been met before signing off on the document. The ADA assessment will be included in the final training product submission pack to the Training Package Assurance Body.

### Roles and Responsibilities

#### Project Manager

Responsible for overseeing the ADA process and ensuring anti-discrimination principles are applied throughout the project.

Duties:

- initiate the ADA process at the start of the project and coordinate its implementation with the project team
- review and monitor the training products' language, structure, and content to ensure non-discriminatory practices are implemented
- consult with stakeholders, including representatives from diverse groups, to address anti-discrimination concerns

- ensure the ADA assessment is completed before submission for final review by the ADA assessor.

### **Technical writers**

Responsible for ensuring training product content is inclusive and free from discriminatory language or bias.

Duties:

- assess and recommend changes to language and terminology to ensure inclusivity
- identify and address potential barriers to access, especially for learners with disabilities
- ensure reasonable adjustments can be made within assessment requirements to suit the needs of individuals with diverse needs
- ensure that sector-specific terminology is inclusive and gender-neutral and that content reflects diversity across race, gender, and other protected characteristics
- consult with stakeholders to gather feedback on inclusivity and address concerns

### **ADA Assessor**

Responsible for conducting the final review of the ADA assessment and ensuring that all anti-discrimination legislation is adhered to.

Duties:

- review the completed ADA assessment and ensure all necessary actions have been taken to remove discriminatory language
- review the training products' language, structure, and content to ensure anti-discrimination compliance
- sign off on the final ADA checklist and submit it with the final training product submission package.

## Anti-Discrimination Assessment (ADA)

Project ID	HMA_ANN_2425_002			
Project Title	Health Services Assistance Qualification Review			
Project Scope For a full list of training products, see appendix A.	<b>No. of Training Products</b>	Major	Minor	Total
	Qualifications (s)	2	0	2
	Unit(s) of competency	9	0	9
	Skill Set(s)	0	0	0
Q1. Are the training products written in plain English, using contemporary, inclusive and representative language? How?				<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>Yes, the training products are written in plain English using contemporary, inclusive and representative language. This has been achieved through systematic review and refinement of wording across all units to ensure clarity, consistency and accessibility at AQF level of each qualification. Complex or ambiguous language has been simplified, and terminology has been standardised, including the consistent use of terms such as “healthcare recipient.” The language has been structured to support comprehension across diverse learner cohorts, including culturally and linguistically diverse learners and those with varying literacy levels, while ensuring alignment with inclusive language principles and the Australian Government Style Manual.</p>				
Q2. Have terms been reviewed for sector-appropriate alternatives that are non-discriminatory? How?				<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>Yes, terminology has been reviewed to ensure the use of sector-appropriate alternatives that are non-discriminatory. Outdated, inconsistent or potentially biased terms were replaced with contemporary language aligned to current healthcare practice and industry expectations. Terminology was standardised across units to improve clarity and consistency, and care was taken to ensure that wording does not imply gender, cultural, or personal bias. The resulting language is neutral, respectful and reflective of the diversity that promotes current industry standards and equality.</p>				
Q3. Have prerequisites or entry requirements that could create barriers for a broad range of individuals been considered? How?				<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
<p>Yes, prerequisites and entry requirements have been reviewed to ensure they are necessary, reasonable and directly aligned to competency and safety requirements, and do not create unjustified barriers to access.</p> <p>No restrictive entry requirements have been applied to the Certificate III Health Service Assistance qualification, supporting equitable access for a broad range of learners.</p> <p>A targeted entry requirement has been introduced for the Certificate IV in Operating Theatre Technical Support to reflect the complexity of the role and ensure learners possess the foundational capability required to operate safely within a surgical environment. Part time equivalent has been added to allow flexibility to allow individuals not working full time</p> <p>The prerequisite unit <i>HLTAID009 Provide cardiopulmonary resuscitation</i> has been added to <i>HLTTHE008 Provide assistance during clinical emergencies in surgical theatre environments</i>, ensuring learners meet essential safety requirements prior to undertaking emergency-related tasks.</p> <p>All prerequisites have been assessed to confirm they are proportionate, industry-justified and consistent with anti-discrimination legislation, avoiding unnecessary exclusion while maintaining safety and quality of care.</p>				

## Qualifications only

Q4. Does the product design offer multiple entry and exit points to promote flexibility and access for a broad range of individuals? How?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
<p>Yes, the product design offers multiple entry and exit points to promote flexibility and access for a broad range of individuals. This has been achieved through review and amendment of the packaging rules to allow flexible elective choices, reducing disadvantage and supporting diverse learner pathways. The design aligns with the Pathways section of the Companion Volume Implementation Guide (CVIG), which outlines progression opportunities across the health services assistance workforce.</p> <p>The qualification structure supports a range of job outcomes, including ward support, orderly, patient care assistance, assistant in nursing, operating theatre support and non-client contact support roles. Learners are able to tailor their pathway based on individual goals, prior experience and employment context. This approach supports progression, specialisation and movement across roles within the health sector, enabling broad participation and access.</p>	
Q5. Does the design of the packaging rules offer a range of elective choices to cater to the diverse needs and interests of learners? (For Qualifications)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
<p>Yes, the design of the packaging rules provides a range of elective choices to cater to the diverse needs and interests of learners. This has been achieved through review and refinement of the training package structure, particularly the range and organisation of elective units available, ensuring sufficient flexibility for learners to select units aligned to their individual career goals, existing skills and workplace contexts.</p> <p>Elective groupings support key job outcomes such as assistant in nursing, operating theatre support, ward support, patient care assistance and non-client contact roles, allowing learners to develop capabilities relevant to different healthcare settings. The packaging structure enables learners to tailor their training pathway and supports progression within the health sector while remaining responsive to diverse learner needs and employment outcomes.</p>	

## Units of Competency only

<p>Q6. Has reasonable adjustment been considered during the development of training products to suit the needs of people with disabilities, including physical, intellectual, sensory and learning difficulties? How?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Yes, reasonable adjustment has been considered throughout the review and refinement of the training products to support learners with a range of disabilities, including physical, intellectual, sensory and learning difficulties. Assessment requirements have been reviewed to ensure they can be adapted without changing the intended competency outcomes.</p> <p>This includes ensuring flexibility in how skills and knowledge can be demonstrated, such as allowing alternative communication methods where appropriate and enabling assessments to be simulated or contextualised to suit individual learner needs. Care has been taken to avoid overly prescriptive requirements that may limit accessibility, ensuring that assessment approaches can be adjusted while maintaining the integrity of the unit outcomes.</p>	
<p>Q7. Have the Performance Criteria, Foundation Skills, and Performance Evidence been reviewed to ensure they are inclusive and free from discrimination based on any protected attributes* (e.g., disability, age, gender, race, sexual orientation, etc.)? How?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Yes, the Performance Criteria, Foundation Skills and Performance Evidence have been reviewed and refined to ensure they are inclusive and free from discrimination based on protected attributes. Performance Criteria have been examined to ensure that requirements do not impose unnecessary barriers, including avoiding assumptions about physical capability where not inherent to the role and ensuring that tasks can be achieved through reasonable alternatives where appropriate.</p> <p>Foundation Skills have been reviewed to ensure that literacy, numeracy and communication requirements are appropriate to the role and do not introduce additional barriers for learners, including those with disabilities, culturally and linguistically diverse backgrounds or varying levels of experience. Flexibility has been considered to allow different ways of demonstrating these skills where appropriate.</p> <p>Performance Evidence has been reviewed to ensure that evidence requirements are clearly defined but not restrictive, allowing for reasonable adjustment and avoiding disadvantage based on age, gender, race, disability or other protected characteristics. Across all components, alignment with Australian anti-discrimination legislation has been considered to support equitable access and participation.</p>	
<p>Q8. Does the product ensure that assessment conditions are flexible enough to accommodate access to learners with protected attributes* (e.g. including disability, age, gender, race, sexual orientation, etc.) including adjustments can be made to location, timing, or format? How?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Yes, assessment conditions have been reviewed to ensure they are flexible enough to accommodate learners with protected attributes. Requirements have been examined to ensure they are not overly specific or restrictive and allow for reasonable adjustment in line with individual learner needs.</p> <p>Assessment conditions allow for variation in location, including the use of simulated or contextualised environments where appropriate, ensuring that learners are not excluded due to access limitations. Flexibility in assessment methods has also been considered to support different ways of demonstrating competence. This approach ensures that assessment remains accessible and inclusive while maintaining the validity and integrity of competency outcomes.</p>	

\*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).

## Declaration

This Anti-discrimination assessment was completed by:

### Project Manager

<b>Name:</b>	<b>Lee Wheeler</b>	
<b>Anti-discrimination Skills and Experience</b>	Lee holds a Diploma of Mental Health, Advanced Diploma of Community Sector Management and associate degree in VET. Delivered training and assessment in the units of competencies - <i>CHCDIV001 Work with diverse people</i> and <i>CHCDIV002 Promote Aboriginal and Torres Strait Islander cultural safety</i> to various cohorts. Lee has participated in professional development training including, Indigenous cultural awareness training (June 2025), teaching students with a CALD background training (September 2025), disability and inclusive environments training (February 2024) and in house ADA training developed by HumanAbility (May 2026).	
<b>Date:</b>	<b>9/04/2026</b>	

### Technical Writer/s

<b>Name:</b>	<b>Abhishek Juneja</b>
<b>Anti-discrimination Skills and Experience</b>	Abhishek holds a Diploma of Quality Auditing and Advanced Diploma of Community Sector Management; He has participated in professional development training delivered by VCROSS on 'How to be Disability Inclusive' in February 2025 and completed the elearning in-house ADA training for technical writers.
<b>Date:</b>	<b>9/04/2026</b>

### ADA Assessor

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.

<b>Name:</b>	<b>Cristina Ferrari</b>
<b>Anti-discrimination Skills and Experience</b>	Cristina holds a Diploma of Community Services, participated in professional development training by VCROSS on 'How to be Disability Inclusive' in February 2025, and completed the Australian Human Rights Commission online training on building a culture of accessibility and inclusion in Jun. 2025. Cristina developed the in-house ADA training for all technical writers and project managers.
<b>Date:</b>	<b>9/04/2026</b>

## Appendix A - Training Products provided for assessment

### Qualifications

Qualification Code	Qualification Title
HLT33126	Certificate III in Health Services Assistance
HLT47526	Certificate IV in Operating Theatre Technical Support

### Units of Competency (UoC)

UoC Code	UoC Title
HLTAIN003	Assist with nursing care
HLTAIN004	Provide non-healthcare recipient contact support
HLTAIN005	Pregnancy and postnatal health and wellbeing foundations
HLTTHE004	Maintain and operate theatre equipment
HLTTHE005	Assist with preparation of healthcare recipient for operative procedures
HLTTHE006	Provide intra-operative equipment and technical support
HLTTHE007	Manage advanced technology in surgical theatre environments
HLTTHE008	Provide assistance during clinical emergencies in surgical theatre environments

### Appendix B – Relevant Anti-Discrimination Legislation

Below is a brief explanation of relevant anti-discrimination legislation and how it relates to developing training products. This section can be referenced during the ADA process to ensure compliance with legal standards.

#### TPPDEPP Requirements

- **Relevant Section/s:**
  - Step 2.2 Undertake Consultations
  - Step 3.1 Determine Revisions
  - Step 5.1 Submission of draft training products to the Assurance Body – Compliance Requirements

The TPPDEPP includes guidelines that ensure training products are designed with inclusivity in mind and do not unintentionally exclude learners based on protected attributes.

The TPPDEPP requires training products to provide flexible pathways and accommodate reasonable adjustments for learners with disabilities or those from disadvantaged backgrounds.

#### Training Product Submission Form

- **Relevant Section/s:**
  - 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.

### **Disability Standards for Education 2005**

The Disability Standards for Education ensure that students with disabilities have the same access to education as students without disabilities. It covers areas such as enrolment, participation, curriculum development, student support services, and eliminating harassment and victimisation.

Technical writers must ensure that reasonable adjustments are considered in developing training products to suit the needs of learners with disabilities. This includes ensuring assessment requirements are not overly descriptive so they can be adapted for reasonable adjustment if required. They must also ensure the language used in training products does not exclude learners with disabilities.

### **Disability Discrimination Act 1992**

- **Relevant Section/s:**
  - S4
  - S5 and 6

The *Disability Discrimination Act (DDA)* makes it unlawful to discriminate against a person based on their disability. Disability includes:

- physical
- intellectual
- psychiatric
- sensory
- neurological, and
- learning disabilities, as well as
- physical difference (facial/limb/physical difference)

The sections identified 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 meet a requirement or condition, but they cannot do so due to their disability, and
- the requirement or condition is unreasonable given the circumstances.

- there has been a failure to make reasonable adjustments to assist the person with disability to meet requirements or conditions

All training products should be accessible to learners with disabilities. Reasonable adjustments must be considered when developing training products to ensure learners with disabilities are not disadvantaged during the learning process.

### **Age Discrimination Act 2004**

- **Relevant Section/s:**
  - Part 1 – Preliminary. S4. Simplified outline
  - Part 4 – Unlawful age discrimination etc. S.26 Education

The *Age Discrimination Act* protects individuals from discrimination based on their age. It is unlawful to discriminate against a person on the grounds 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 an educational institution)

Training products should be designed to accommodate learners of all ages. This includes ensuring that assessment requirements are accessible to both younger and older learners, avoiding unnecessary age-based prerequisites, and offering flexible learning options that suit a variety of age groups.

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

Age Discrimination Act 2004 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](https://www.austlii.edu.au/cgi-bin/viewdoc/au/legis/cth/consol_act/ada2004174/sch1.html)

### **Sex Discrimination Act 1984**

- **Relevant Section/s:**
  - S 5, 6 and 7

The *Sex Discrimination Act 1984* (Cth) ('SDA') covers discrimination on the grounds 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)

Training products must use gender-neutral language and inclusive terminology. This includes eliminating gender biases and ensuring that both men and women are included and have equal access to all learning opportunities.

### **Racial Discrimination Act 1975**

*The Racial Discrimination Act* makes it unlawful to discriminate against someone based on their race, colour, descent, national 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 that appear to treat everyone the same but 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.

Training products should avoid racial or ethnic biases. This includes ensuring that the language used includes all racial and ethnic groups and that assessments and course content do not unintentionally favour one group.

### **Other Relevant State or Federal Anti-Discrimination Legislation**

In addition to the above federal laws, state or territory-specific anti-discrimination laws may apply to the development of training products. These laws often cover additional grounds, such as religious discrimination or political affiliation.

Ensure that training products comply with any additional anti-discrimination laws. This may include making reasonable accommodations for learners based on religious or political beliefs.