



Access and Equity Policy (Support learners)

1. Policy

JTI as a registered training organization delivers nationally recognized training programs and in doing so accepts its responsibility to deliver these programs in a fair and equitable manner. JTI will ensure the following:

- All staff are made aware of the access and equity principles at induction
- All students are made aware of the access and equity principles at orientation and the complaints resolution process
- There is an environment of support and care for students that also encourages cultural understanding and sensitivity
- That early identification and intervention is provided to students requiring support
- Access and equity regulations are considered when developing new products, policies, practices, systems and procedures
- If required, appropriate counseling and training will be provided to any employees who provide services to under-represented groups
- There is an ongoing commitment to eliminate access and equity barriers identified within JTI's processes, practices and business decisions
- There is liaison with disability support groups to ensure special needs can be provided in areas where the Institute has no knowledge or experience
- That there is provision of support and tutorial assistance for any student that is encountering learning difficulties
- There are regular reviews of access and equity policies and procedures to ensure they are:
 - meeting legislative requirements
 - satisfy individual student needs
 - enable participant outcomes to be met
 - addresses community needs
- In addition to formal reviews, the policies and procedures will be reviewed whenever there is a change in legislation or if there are circumstances identified that are not covered by this policy.
- JTI requests students declare if they need specific assistance about language, literacy and numeracy so that specific learning support may be provided. Alternative learning and assessment strategies will be utilized by JTI staff to assist students with special needs.

2. Principle

JTI is committed to providing and promoting non-discriminatory, inclusive practices and processes to provide equal opportunities for all students to achieve their learning outcomes and strives to ensure that its decision-making processes reflect a commitment to access and equity and treats all students or prospective students fairly.

3. Scope

This policy relates to the provisions of all training and support services offered by JTI to students. In addition, all staff, contractors employed or engaged by JTI are obliged to comply with this policy.

4. Legislative Obligations

This policy acknowledges JTI's legal obligations in relation to Access and Equity under relevant legislation, to ensure that the Institute's working and training practices are fair and equitable, and the working and learning environment is non-discriminatory. Australian federal and state legislation makes it unlawful for organizations to discriminate against individuals because of their age, gender, race, marital status, sexuality, or physical or intellectual disability. The following legislation underpins all matters related to access and equity at JTI.

Relevant legislation:

Anti-discrimination Act 1997
Age Discrimination Act 2004
Disability Discrimination Act 1992 (including Disability Standards for Education)
Disability Discrimination Act 2005
Racial Discrimination Act 1975
Sex Discrimination Act 1984

5. Procedures

This policy and accompanying procedures outlines the reasonable adjustments and facilities, services and academic learning support that will be provided to students in the following areas.

To ensure that the learning environment of JTI is free from harassment, discrimination and victimization, the Institute will ensure:

- a. All recruitment, admissions and enrolment processes undertaken by JTI have been designed to be free from discrimination.
- b. There are published entry criteria for all students for all programs offered by the Institute with access and equity issues contributing to the course entry requirements and prerequisites.
To ensure that the student recruitment and admission process is bias-free and non-discriminatory, JTI:

- Uses the same recruitment and enrolment processes for all applicants;
 - Bases admission to courses and programs on availability of places and clinical placement and the applicant satisfying course/qualification and funding entry requirements (where applicable)
 - Provides applicants with adequate information and support for the individual to enable them to select the most suitable program for their training requirements.
- c. Staff and students are made aware of access and equity as part of orientation, adherence to privacy and confidentiality requirements.

6. Pre-enrolment procedures

Where prospective students indicate any type of disability and/or learning difficulty on their initial enrolment application the following procedures will be applied:

- a. Any disabilities and/or learning difficulties indicated on the Institute enrolment form/Training plan will be recorded in the Student Management System and notification will be provided to the trainer for review as part of the enrolment process.
- b. The trainer in conjunction with the training manager or equivalent will be responsible for assessing the student's disabilities and/or learning difficulties to determine whether reasonable adjustments can be implemented to provide appropriate training for the student. The trainer will advise the applicant of the decision concerning enrolment and any reasonable adjustment that would be provided.
- c. The trainer will record the enrolment decision and details of reasonable adjustments in the training plan.
- d. If reasonable adjustments cannot be provided to accommodate the applicant this information will be recorded in the training plan and the student will be advised
- e. The Trainer in conjunction with the Training Manager will coordinate the implementation of agreed reasonable adjustments prior to the student's commencement of the training program.

7. Post enrolment procedures

For students who advise of any disabilities and/or learning difficulties during the student interview or orientation or after the commencement of their training program the following procedures will apply:

- a. Details of the student disability and/or learning difficulties will be recorded in the Student Management System and Training Plan.

- b. Details of the student disability and/or learning difficulties will be provided to the Trainer and the Training Manager.
- c. The Trainer will undertake an interview with the student to determine whether reasonable adjustments can be provided to the student. The Trainer will notify the student of the decision regarding reasonable adjustment and ensure that the decision is recorded in the Student Management System.
- d. The Training Manager will coordinate the implementation of agreed reasonable adjustments as soon as possible but no later than 10 working days from the date of application.
- e. If reasonable adjustment cannot be provided, this decision will be recorded in the Student Management System and the student may be provided with course counseling and if an alternative course cannot be provided for the student, the Training Manager will issue the student with a Termination of Enrolment letter. The Termination letter will include details of the Institute's Complaints and Appeals Policy and Refund Policy.

8. Support Services for those with Special Needs

All enrolled students with a recognized disability will be offered specialized services to assist them to participate in training and assessment activities for which they are enrolled. These services may be provided by JTI or by another person or agency.

JTI takes all reasonable steps to provide a student with a recognized disability, all support services on the same basis as a student without a disability and without experiencing discrimination.

To provide appropriate support services for a student with a recognized disability, JTI will:

- Consult with the enrolled student about the need for the student's requirements of access to specialized support services;
- Decide if an adjustment is justified so that the student can participate in the training and assessment activities for the program for which they are enrolled;
- Identify what an appropriate adjustment might include and make the necessary adjustment for the enrolled student.

JTI will provide training to all staff to make them aware of the support services available for the students with recognized disabilities to enable them to assist students to access support services required. JTI will also facilitate the provision of specialized services for the student where necessary including collaborative arrangements with specialized service providers.

JTI may provide support services, or arrangement for services, for students with a recognized disability including:

- The use of adaptive/assistive technology (e.g. larger print ...)
- Educational support
- Alternative assessment methods
- Extra time to complete a course or assessment
- Learning support for basic literacy or numeracy difficulties.

9. Support to ATSI students

Students of Indigenous background may choose to liaise with the Course Manager. The Course Manager will assist with contacting the external Koori liaison officer who will provide cultural, study and general support for Indigenous students. The Training Manager will assist with the arrangement of appropriate cultural support services at the Institute's expense. People from all social and cultural backgrounds will be equally treated and due respect will be given to Aboriginal and Torres Strait Islander people, people from Culturally and Linguistically Diverse background, people with disability and mature age students. Additional free of charge teaching-learning sessions will be arranged for students who require extreme support (additional support classes). Students will be guided to external support agencies, if required, for specific support strategies. The Training Manager, as the JTI representative, will make decisions regarding this service.

10. Academic and Learning Support

Reasonable adjustments can be made to accommodate students with a recognized disability requiring academic, learning and assessment support. Students should disclose any support requirements as early as possible (preferably at interview) to allow reasonable adjustment to be provided. In relation to academic and learning support reasonable adjustment may include:

- a. Academic learning support for all students requiring assistance including the areas of literacy and numeracy support;
- b. Alternative methods of assessment where reasonable. This may include the use of oral assessments, changes to paper color, font size or style where appropriate, monitors with large display, adjusted print materials or adaptive technology (such as Microsoft Magnifier), digital talking and audio books E-books with large format Microsoft Narrator (text to speech) Acetate sheets –colored (dyslexia) English language pronunciation programs
- c. An extension of time for completing assessment tasks.

All assessment pieces and tasks that JTI utilize have been designed to be fair, reliable and consistent. All students are provided with the requirements of assessment for all units of competency at the beginning of study programs. Assessments for units of competency delivered by online format have been adapted for flexible delivery and are provided to students in a relevant format.

Any adjustment to assessment for students with disabilities will be negotiated before the assessment task is required to be undertaken.

11. Facilities Access

The Campus Manager in consultation Building Manager at each campus is responsible for ensuring campus buildings, rooms, toilets and resources comply with relevant building requirements including access for people with disabilities. Facilities will be reviewed on a regular basis and reports sent to the CEO. If normal points of exit are not available, notices including alternative access will be posted where appropriate.

All staff are required to assist anyone needing help to access training materials, files, equipment, or other items that may be inaccessible to students.

Any adjustments should be made by the Training Manager or designated officer before the student commences the course. Students may wish to indicate disabilities in their application form and/or during orientation.

12. Visual impediments and reading impediments

When required, reasonable adjustments can be made to accommodate students with visual and/or reading problems. This may include reading aids and adaptive technology products available on the market to assist when reading, either in hard copy or electronic forms.

13. Online materials and services

Students undertaking training online and on-campus students will have equal access to training and assessment materials and support services. While online materials and support services have been primarily developed for online learning students, all materials and services are available to on-campus students and include the following:

- a. Online library and journals where available
- b. Recorded sessions
- c. Videos
- d. Simulations
- e. Training materials with learning outcomes
- f. Assessments that parallel on-campus training and learning
- g. Student and support services as currently provided.
- h. Online materials can be available in print for students who do not have online access.

Adaptive technology is used where reasonable adjustment can be made.

14. Complaints and Appeals

Individuals who consider they have been treated unfairly are encouraged to use JTI's Complaints and Appeals Policy and Procedure.

15. Reasonable Adjustment

A reasonable adjustment is a measure or action that will be taken to assist a student with a recognized disability to participate in training on the same basis as other students. An adjustment is reasonable if it considers the student's learning needs and balances of all parties affected – the student with the disability, JTI, Institute staff and other students undertaking training.

JTI is aware that the training programs delivered by the Institute will sometimes need adjustments to ensure equal opportunity for students with disabilities. The nature of reasonable adjustments is such that they are designed to minimize the disadvantage experienced by learners with a disability, rather than provide learners with a competitive advantage. This can include administrative, physical or procedural modifications.

In cases of reasonable adjustment:

- a. A student with a recognized disability may not require adjustments in some circumstances or always.
- b. However, a student with a recognized disability may require multiple adjustments and may include multiple activities.
- c. At all times, the integrity of the training and the assessment requirements or processes must be maintained.
- d. JTI will be timely in investigating and implementing any adjustments while maintaining confidentiality regarding the student with a recognized disability.

Factors that will be considered when assessing for reasonable adjustment include:

- The nature of the disability presented
- Information provided or accessed about a student's disability about how the disability will affect their ability to participate in training
- Clarifying the student's ability to comply with non-discriminatory requirements of a training program
- Seeking information from the student about their preferred adjustment, as the student may have a developed understanding of what may be suitable.

16. Costs and Benefits of adjusting

The effects of reasonable adjustment on the Institute, staff and students and direct and indirect costs will be considered by JTI including:

- The costs associated with staffing, special resources, and the modification of training materials and curriculum;
- The adverse impact on learning, occupational and social outcomes for the student, other students and training staff;
- Benefits that may be achieved to all people and the Institute from the student with a recognized disability's participation.

17. Exceptions

The Disability Discrimination Act Standards for Education 2005 do not render it unlawful for RTO's or education providers to not comply with requirements of the standards in the following circumstances:

- Where JTI claims that it would impose unjustifiable hardship
- The student's disability is an infectious disease or other condition and it is reasonably necessary to isolate or discriminate to protect the health and welfare of the students and other students and staff
- Where JTI is complying with courts orders, Human Rights and Equal Opportunity Commission decisions, prescribed law and regulations of the Commonwealth, State or Territory as Section 47 of the Disability Discrimination Act 1992.

18. Unjustifiable Hardship

When a reasonable adjustment is considered, balancing the interest of all parties concerned, deliberation on whether the adjustment will impose hardship on JTI.

If unjustifiable hardship is considered, JTI will consider all financial and other resources that are reasonably available for the purposes of making any necessary adjustments for the student, and the impact of those adjustments on the capacity to provide training programs of high quality to ALL students while remaining financially viable.

- JTI will consider direct and indirect costs and benefits including:
- Costs associated with staffing, the provision of special resources, modifying training materials and curriculum
- The adverse effects on learning, occupational and social outcomes of the student, other students and training staff
- Identified benefits to all involved persons from the student's participation.

When JTI applies the principles of unjustifiable hardship, the Institute will:

- Ensure that the process for seeking the adjustment is accessible and transparent.
- Notify the student regarding decisions made on reasonable adjustment and the reasons for the decision as soon as possible after the decision made. The Training Manager in consultation with the GM will discuss the decision with the student and the outcomes will be recorded in the student management system.

19. Continuous Improvement

This Access and Equity policy and accompanying procedures for vocational education and training systems of the Institute will be continuously implemented and reviewed for areas of improvement. The policy and accompanying procedures will be formally reviewed annually as part of the general continuous improvement process.

Definitions

Access and equity refers to the policies, procedures and approaches that ensure that JTI's training programs are responsive to the diverse needs of all students. Access and equity is concerned with removing the barriers and the opening of opportunities. In education and training, it means ensuring that people with differing needs and abilities have the same opportunities to successfully gain skills, knowledge and experience through education and training irrespective of their age, disability, colour, race, gender, religion, sexuality, family responsibilities, or location.

Diversity is the recognizing and valuing of individual differences.

Disability: Per Disability Discrimination Act 1992; disability, in relation to a person, means:

- (a) Total or partial loss of the person's bodily or mental functions; or
- (b) Total or partial loss of a part of the body; or
- (c) The presence in the body of organisms causing disease or illness; or
- (d) The presence in the body of organisms capable of causing disease or illness; or
- (e) The malfunction, malformation or disfigurement of a part of the person's body; or
- (f) A disorder or malfunction that results in the person learning differently from a person without the disorder or malfunction; or
- (g) A disorder, illness or disease that affects a person's thought processes, perception of reality, emotions or judgment or that results in disturbed behavior and includes a disability that:

- Presently exists; or
- Previously existed but no longer exists; or
- May exist in the future (including because of a genetic predisposition to that disability); or
- Is imputed to a person.

To avoid doubt, a disability that is otherwise covered by this definition includes behavior that is a symptom or manifestation of the disability.

Reasonable adjustment refers to reasonable adjustment that can be made to facilities, documentation, learning and assessment, and support services which will facilitate access for disabled students and staff and ensure valid and reliable assessment decisions at a reasonable cost while meeting the special requirements for the individual/s.