

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	EEH_ANN_2324_004L			
Project Title	Pathology Qualification Review			
Project Scope For a full list of training products, see appendix A.	No. of Training Products	Major	Minor	Total
	Qualifications (s)	2	0	2
	Unit(s) of competency	1	8	9
	Skill Set(s)	1	1	2
Q1. Are the training products written in plain English, using contemporary, inclusive and representative language? How?				☐ x Yes ☐ No
Yes, the training products are written in plain English, using contemporary language, inclusive and representative language. This has been achieved by simplifying complex terms and avoiding jargon to ensure clarity and ease of understanding for all learners. The language was selected to be respectful and reflective of diverse groups, avoiding stereotypes or exclusionary expressions.				
Q2. Have terminology been reviewed for sector-appropriate alternatives that are non-discriminatory? How?				☐ x Yes ☐ No
Yes, terminology has been reviewed to ensure the use of sector-appropriate alternatives that are non-discriminatory. Where necessary, outdated or potentially biased terms were replaced with inclusive, respectful language that reflects current industry standards and promotes equality.				
Q3. Have prerequisites or entry requirements that could create barriers for a broad range of individuals been considered? How?				☐ x Yes ☐ No ☐ NA
Prerequisites and entry requirements have been designed to be inclusive and not create barriers to access. This involved reviewing existing criteria to ensure they are necessary, reasonable and directly related to the skills and knowledge needed for the qualification.				

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?				☐ x Yes ☐ No ☐ NA
Yes, the product design offers multiple entry and exit points to promote flexibility and access for a broad range of individuals. Product design has been amended to a merged qualification which allows candidates to choose a stream of mandatory electives and other appropriate electives to meet their preferred qualification. This structure supports customised learning pathways aligned with individual goals and industry needs. Additionally, the product includes two skill sets to support those candidates who do not require the full qualification. This flexible design enables learners to enter or exit the program at different stages, accommodating varying levels of experience, learning needs, and career objectives.				
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)				☐ x Yes ☐ No ☐ NA
Yes, the design of the packaging rules offers a wide range of elective choices to cater to the diverse needs and interests of learners. By including an extensive elective bank for each stream, learners can tailor their qualification to suit their career goals, prior experiences and				

personal interests. The flexible structure supports a variety of pathways and allows individuals to develop skills most relevant to their chosen industry or role.

Units of Competency only

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?	☒ X Yes ☐ No
Yes, reasonable adjustment has been considered throughout the development of the training products to ensure they are accessible to individuals with a range of disabilities, including physical, intellectual, sensory, and learning difficulties. This has been achieved by applying inclusive design principles to the structure and content of the training products, using clear and plain language, and avoiding complex formatting that could hinder accessibility. Flexibility has been embedded in the assessment requirements to allow adjustments in the method of assessment, without altering the intended learning outcomes. Additionally, guidance has been aligned with national standards and best practices to support trainers and assessors in implementing appropriate adjustments that meet individual learners.	
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?	☒ X Yes ☐ No
Yes, the Performance Criteria, Foundation Skills, and Performance Evidence have been carefully reviewed to ensure they are inclusive and free from discrimination based on protected attributes such as disability, age, gender, race, sexual orientation, and others. This review involved assessing the language used to confirm it is neutral, respectful, and appropriate for diverse learners. The content was examined to ensure it does not assume specific physical abilities, cultural backgrounds, or personal characteristics, and that it allows for a variety of ways to demonstrate competence. Where relevant, inclusive terminology and examples were incorporated, and flexibility was considered in how skills can be demonstrated, supporting equitable access for all learners.	
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?	☒ x Yes ☐ No
Yes, the product ensures that assessment conditions are flexible enough to accommodate learners with protected attributes. This flexibility is built into the design by allowing adjustments to the location, timing and format of assessments to meet individual needs. For example, assessments can be conducted in accessible venues, offered at different times to suit learner's schedules or delivered through alternative methods such as online or practical demonstrations. These provisions help create an inclusive assessment environment that respects diversity and removed barriers to participation while maintaining the integrity of the competency standards.	

*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

Name:	Lee Wheeler
Anti-discrimination Skills and Experience	Holds a Diploma of Mental Health, Advanced Diploma of Community Sector Management and associate degree in VET. Delivered training and assessment units of competencies in CHCDIV001 Work with diverse people & CHDIV002 Promote Aboriginal and Torres Strait Islander cultural safety to various cohorts. Has participated in professional development training including, Indigenous cultural awareness training (June 2025), teaching students with a CALD background training (Sept 2025), disability and inclusive environments training (Feb 2024) and in house ADA training developed by HumanAbility (May 2026).
Date:	06/06/2025

Technical Writer/s

Name:	Sandra Wesselink
Anti-discrimination Skills and Experience	Hold a Diploma of Training and Assessment and Diploma of Veterinary Nursing. Have been a trainer and assessor in VET for 25 years. Have designed assessments and resources for units of competency ACMGAS308 Communicate effectively with clients and team members and ACMGEN315 Communicate effectively with clients and team members. Have completed “diversity, inclusion and belonging” and code of conduct training annually in VET education as part of RTO mandatory training 2000 to 2025. Have participated in professional development training by VCOSS on ‘How to be Disability Inclusive’ in Feb. 2025; Completed an in house ADA training developed by HumanAbility (May 2026).
Date:	06/06/2025

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.

Name:	Cristina Ferrari
Anti-discrimination Skills and Experience	Holds a Diploma of Community Services; Participated in professional development training by VCOSS on ‘How to be Disability Inclusive’ in Feb. 2025; Completed the Australian Human Rights Commission online training on building a culture of accessibility and inclusion in Jun. 2025. Developed elearning in-house ADA training for all technical writers and project managers.
Date:	06/06/2025

Appendix A - Training Products provided for assessment

Qualifications

Qualification Code	Qualification Title
HLT37525	Certificate III in Pathology

Units of Competency (UoC)

UoC Code	UoC Title
HLTCAR004	Perform electrocardiography (ECG)
HLTCAR005	Perform holter monitoring
HLTHPS011	Measure spirometry
HLTPAT008	Identify and respond to clinical risks in pathology collection
HLTPAT009	Collect pathology specimens other than blood
HLTPAT010	Collect specimens for drugs of abuse testing
HLTPAT011	Receive, prepare and dispatch pathology specimens
HLTPAT012	Perform capillary blood collection
HLTPAT013	Perform venous blood collection from children 0 to 5 years

Skill Sets

Skill Set Code	Skill Set Title
HLTSS00059	Venous Blood Collection Skill Set
HLTSS00085	Perform Blood Collection from Children Aged 0 to 5 years Skill Set

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

[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.