

Access and Equity Procedure



Institute of Health and
Nursing Australia

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1. Purpose

- 1.1 This document sets out the procedures by which Institute of Health and Nursing Australia (IHNA) will ensure that staff and students are treated in a fair and equitable manner. This procedure is pursuant to the *Access and Equity Policy*.

2. Scope

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

3. Definitions

Access and equity refer to the policies, procedures and approaches that ensure that IHNA's training programs are responsive to the diverse needs of all students and potential students. Access and equity are 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 recognising and valuing of individual differences.

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

- total or partial loss of the person's bodily or mental functions; or
- total or partial loss of a part of the body; or
- the presence in the body of organisms causing disease or illness; or
- the presence in the body of organisms capable of causing disease or illness; or
- the malfunction, malformation, or disfigurement of a part of the person's body; or
- a disorder or malfunction that results in the person learning differently from a person without the disorder or malfunction; or
- a disorder, illness or disease that affects a person's thought processes, perception of reality, emotions, or judgment or that results in disturbed behaviour; 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 behaviour 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 potential students and staff and ensure valid and reliable assessment decisions at a reasonable cost while meeting the special requirements for the individual(s).

Potential Students refers to all persons seeking to enrol in a VET unit of study that meets the course requirements as per the prevailing regulation.

4. Procedures

- 4.1 This procedure outlines the reasonable adjustments and facilities, services and academic learning support that will be provided to students and potential students in the areas identified below.
- 4.2 To ensure that the learning environment of IHNA is free from harassment, discrimination, and victimisation, IHNA will ensure:
 - a) That staff and students and potential students are made aware of access and equity as part of orientation or induction;
 - b) Adherence to privacy and confidentiality requirements;
 - c) The development of products, policies, systems, and procedures are informed by access and equity principles;
 - d) IHNA has policies and procedures in place that support the principles of access and equity;
 - e) Continuous improvement and review of policies and procedures to meet legislative changes and student feedback.

5. Recruitment, Admissions and Enrolment

- 5.1 IHNA has open, fair and transparent procedures, based on merit for making decisions about:
 - a) the selection, from among Potential Students; and
 - b) the treatment of students.
- 5.2 All recruitment, admissions and enrolment processes undertaken by IHNA have been designed to be free from discrimination, regardless of their background, circumstances, or eligibility for funding. There are published entry criteria for all students and potential students for all programs offered by IHNA with access and equity issues contributing to the course entry requirements and prerequisites.

- 5.3 To ensure that the student recruitment and admission process is bias-free and non-discriminatory, IHNA:
- Uses the same recruitment and enrolment processes for all applicants;
 - Basis admission to courses and programs on availability of places, clinical/work placement and the applicant satisfying course/qualification, entry requirements and funding entry requirements (where applicable). Each course/qualification has a specific course brochure that clearly outlines the Admission Criteria and Entry Requirements for all students and potential students.
 - Provides applicants with adequate information and support for the individual to enable them to select the most suitable program for their training requirements.
 - The Admission Criteria and Entry Requirements does not prevent IHNA considering, in making decisions mentioned above, educational disadvantages that a particular student or potential student has experienced or the fact that the student or potential student may be enrolled via a VET restricted access arrangement.
 - The application and enrolment will be carried out according to IHNA's 'Application and Enrolment Procedure VET Courses' <https://www.ihna.edu.au/policydocuments/listing>.

6. Pre-enrolment Procedures

- 6.1 Where potential students indicate any type of disability and/or learning difficulty on their initial enrolment application the following procedures will be applied:
- Any disabilities and/or learning difficulties indicated on the Institute enrolment form will be recorded in the Student Management System and notification will be provided to the Course Coordinators and relevant Trainer/Assessor for review as part of the enrolment process.
 - The Course Coordinators/Trainer/Assessor 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. They will advise the applicant of the decision concerning enrolment and any reasonable adjustment that would be provided.
 - The Course Coordinators/Trainer/Assessor will record the enrolment decision and details of reasonable adjustments in the Student Management System Training Plan and Comprehensive Assessment Record. All details will be provided to the applicant through Academic Portal. If reasonable adjustments cannot be provided to accommodate the applicant this information also will be recorded in the Student Management System.
 - The Course Coordinators/Trainer/Assessor will coordinate the implementation of agreed reasonable adjustments prior to the student's commencement of the training program.

7. Post Enrolment Procedures

- 7.1 For potential 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:
- Details of the student disability and/or learning difficulties will be recorded in the Student Management System and Training Plan and Comprehensive Assessment Record. Details of the student disability and/or learning difficulties will be provided to the Course Coordinators/Trainer/Assessor and the Student Administration Officer.
 - The Course Coordinators/Trainer/Assessor will undertake an interview with the student to determine whether reasonable adjustments can be provided to the student. The Course Coordinators/Trainer/Assessor will notify the student of the decision regarding reasonable adjustment and ensure that the decision is recorded in the Student Management System.
 - The Course Coordinators/Trainer/Assessor will coordinate the implementation of agreed reasonable adjustments as soon as possible but no later than 10 working days.
 - If reasonable adjustment cannot be provided, this decision will be recorded in the Student Management System and the student may be provided with course counselling and if an alternative course cannot be provided for the student, the Registrar will issue the student with a Termination of Enrolment letter. The Termination letter will include details of IHNA's Complaints and Appeals Policy and Refund Policy.

8. Course Design

- 8.1 Course design and assessment is designed to be flexible and to be able to make reasonable adjustments if required. All training documents will be non-discriminatory and will avoid exclusive language and examples.
- 8.2 To ensure that all curriculum and training materials developed by IHNA are inclusive of a range of student needs, IHNA:
- Considers issues relating to access and equity when specifying course entry requirements and prerequisites;
 - Offers flexible course and training materials design to provide multiple entry and exit points or pathways through the course (if applicable), including credit transfer and recognition of prior learning;
 - Considers the requirements of students and potential students with a range of disabilities when assessing courses for delivery;
 - Provides inclusive and non-discriminatory learning and training materials;
 - Will ensure that language, literacy, and numeracy requirements are consistent with the vocational level of the qualification being considered or offered.

9. Support Services for those with Special Needs

- 9.1 All enrolled students with a recognised disability will be offered specialised services to assist them to participate in training and assessment activities for which they are enrolled. These services may be provided by IHNA or contracted to another person or agency.
- 9.2 IHNA takes all reasonable steps to provide a student with a recognised disability all support services on the same basis as a student without a disability and without experiencing discrimination.
- 9.3 If a specialised support service is required for a student with a recognised disability to participate in the training and assessment activities required for the program, they are enrolled in is already provided by IHNA, staff will take reasonable steps to ensure the student with a recognised disability has access to the support service(s).
- 9.4 If a specialised support service is required for a student with a recognised disability to participate in the training and assessment activities required for the program, they are enrolled is not provided by IHNA, IHNA will take reasonable steps to facilitate the provision of the service to the student by another agency.
- 9.5 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 (CALD), work and life experiences, people with disability and mature age students and potential students.
- 9.6 In order to provide appropriate support services for a student with a recognised disability, IHNA will:
 - a) Consult with the enrolled student about the need for the student's requirements of access to specialised support services.
 - b) 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;
 - c) Identify what an appropriate adjustment might include and make the necessary adjustment for the enrolled student.
- 9.7 IHNA will provide training to all staff to make them aware of the support services available for the students and potential students with recognised disabilities to enable them to assist students and potential students to access support services required. IHNA will also facilitate the provision of specialised services for the student where necessary including collaborative arrangements with specialised service providers.
- 9.8 IHNA may provide support services, or arrangement for services, for students and potential students with a recognised disability including:

- a) The use of adaptive/assistive technology;
- b) Educational support;
- c) Alternative assessment methods;
- d) Extra time to complete a course or assessment;
- e) Learning support for basic literacy or numeracy difficulties.

10. Support to Aboriginal and Torres Strait Islander and CALD background students and potential students

- 10.1 Students and potential students of Aboriginal and Torres Strait Islander background may choose to liaise with the Course Coordinator / Trainer/Assessor. The Course Coordinator / Trainer/Assessor will assist with the arrangement of appropriate support services at IHNA's expense.
- 10.2 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 (CALD), work and life experiences, people with disability and mature age students and potential students.
- 10.3 Additional free of charge teaching-learning sessions will be arranged for students and potential students who require extreme support. Students and potential students will be guided to external support agencies, if required, for specific support strategies. Course Coordinator/Trainer/Assessor, as the IHNA representative, will make decisions regarding this service.
- 10.4 Any further request and assistance required will be brought to the attention of the Aboriginal and Torres Strait Islanders Education and Support Committee.

11. Academic and Learning Support

- 11.1 Reasonable adjustments can be made to accommodate students and potential students with a recognised disability requiring academic, learning and assessment support.
- 11.2 Students and potential 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 and potential 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 colour, font size or style where appropriate;
 - c) An extension of time for completing assessment tasks.

- 11.3 All assessment pieces and tasks that IHNA utilise have been designed to be fair, reliable, and consistent. All students and potential 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 and potential students in a relevant format.
- 11.4 Any adjustment to assessment for students and potential students with disabilities will be negotiated before the assessment task is required to be undertaken.

12. Facilities Access

- 12.1 The Campus 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 every six (6) months and reports sent to the Work Health & Safety representative. If normal points of exit are not available, notices including alternative access will be posted where appropriate.
- 12.2 All staff are required to assist anyone needing help to access training materials, files, equipment, or other items that may be inaccessible to students and potential students.
- 12.3 Students and potential students with disabilities should have all materials made accessible to them without having to ask for assistance wherever possible. Any adjustments should be made by the Course Coordinator or designated officer before the student commences the course. Students and potential students may wish to indicate disabilities in their application form and/or during orientation.

13. Visual impediments and reading impediments

- 13.1 When required, reasonable adjustments can be made to accommodate students and potential 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 including, but not limited to:
- a) Monitors with large display
 - b) Large print materials or adaptive technology (such as Microsoft Magnifier)
 - c) Digital talking and audio books
 - d) E-books with large format
 - e) Microsoft Narrator (text to speech)
 - f) Acetate sheets - coloured (dyslexia)
 - g) English language pronunciation programs

14. Online materials and services

14.1 Students undertaking training online and on-campus 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;
- b) Training materials with learning outcomes;
- c) Assessments that parallel on-campus training and learning;
- d) Student and support services as currently provided.

14.2 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.

15. Complaints (Grievance) and Appeals

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

16. Reasonable Adjustment

16.1 A reasonable adjustment is a measure or action that will be taken to assist a student with a recognised 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, IHNA, Institute staff and other students undertaking training.

16.2 IHNA 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 minimise the disadvantage experienced by learners with a disability, rather than provide learners with a competitive advantage. This can include administrative, physical, or procedural modifications.

16.3 In cases of reasonable adjustment:

- a) A student with a recognised disability may not always require adjustments in some circumstances or.
- b) However, a student with a recognised 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) IHNA will be timely in investigating and implementing any adjustments while maintaining confidentiality regarding the student with a recognised disability.
- e) Factors that will be considered when assessing for reasonable adjustment include:
 - a. The nature of the disability presented;

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

17. Costs and Benefits of Adjusting

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

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

18. Exceptions

18.1 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:

- a) Where IHNA claims that it would impose unjustifiable hardship;
- b) 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;
- c) Where IHNA 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.

19. Unjustifiable Hardship

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

19.2 If unjustifiable hardship is considered, IHNA 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.

19.3 IHNA will consider direct and indirect costs and benefits including:

- a) Costs associated with staffing, the provision of special resources, modifying training materials and curriculum.
- b) The adverse effects on learning, occupational and social outcomes of the student, other students, and training staff;
- c) Identified benefits to all involved persons from the student's participation.

19.4 When IHNA applies the principles of unjustifiable hardship, IHNA will:

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

20. Harassment and Victimisation

- 20.1 Disability harassment is defined as an action taken in relation to an individual's disability that is reasonably likely to humiliate, offend, intimidate, or distress the individual with a disability.
- 20.2 IHNA has developed and implemented strategies and programs that are designed to support the rights of students and potential students with a disability to training and assessment that will protect them wherever possible from discrimination, harassment, or victimisation based on their disability.
- 20.3 IHNA has developed and implemented strategies and processes to prevent harassment or victimisation in the training environment. This includes all reasonable steps to ensure all staff and students and potential students are made aware of the responsibility for protection of all students and potential students against harassment or victimisation of students and potential students with a recognised disability and the actions that must be undertaken if harassment or victimisation occurs.

21. Continuous Improvement

- 21.1 This Access and Equity Procedure for vocational education and training systems of IHNA will be continuously implemented and reviewed for areas of improvement. The procedure will be formally reviewed in every three years as part of the general continuous improvement process.

22. Associated Information

Related Internal Documents	<ul style="list-style-type: none"> • Access and Equity Policy
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Related Legislation, Standards, and Codes	<ul style="list-style-type: none"> • 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
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23. Change History

Version Control		Version 4.0
Change Summary	Date	Brief description of the change, incl version number, changes, who considered, approved, etc.
	10/03/2021	Separated Procedure from Policy, revised and updated with pertinent sections