

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_006			
Project Title	Audiometry 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	8	0	8
	Skill Set(s)			1
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. Gender-neutral language has been applied across all elements and performance criteria to ensure that no assumptions or biases are embedded in the content. Examples: Inclusive and flexible performance evidence: Flexibility was introduced into performance evidence requirements to avoid creating barriers for learners who may have limited access to specific client groups. Use of consistent and neutral terminology: Standardised, inclusive terms have been used throughout the units. For instance: The term “clients” was adopted consistently in place of ‘individuals’ or ‘patient’, to ensure clarity, respect, and alignment with industry norms.				
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. The review involved aligning terminology with current industry usage, ensuring it reflects contemporary practice in the audiometry sector. For example, the term “clients” is used consistently throughout, as it is the standard term preferred by the sector and is inclusive of all individuals receiving services.				
Q3. Have prerequisites or entry requirements that could create barriers for a broad range of individuals been considered? How?				☐ x Yes ☐ No ☐ NA
Yes, potential prerequisites and entry requirements were carefully considered as part of the review process to ensure they do not create unnecessary barriers for learners from diverse backgrounds. This issue was also discussed with the Technical Committee. It was clarified that concerns regarding the order of delivery could be addressed through training and assessment strategies, rather than through formal prerequisites. The distinction between sequencing of delivery and the need for a prerequisite was discussed, and the committee agreed that the unit could be delivered without a mandated prerequisite. As a result, no prerequisites or entry requirements have been applied, ensuring that access to the qualification and units remains open and inclusive to a broad range of learners.				

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
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Yes, the product design offers multiple entry and exit points to promote flexibility and access for a broad range of individuals. This structure supports customised learning pathways aligned with individual goals and industry needs. Additionally, the product includes one skill set 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. There are no pre-requisites or entry requirements in training products.

HLTSS00088 Allied Health Assistance – Audiometry Skill Set has superseded HLTSS00047 Audiometry Skill Set to provide the essential skills and knowledge for allied health assistants working under the direct, indirect, or remote supervision and delegation of audiologists or audiometrists to assist in audiometry services. It is designed to equip allied health assistants with foundational competencies in conducting audiometric screening and supporting the day-to-day management of hearing devices.

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 a range of options in the elective bank, learners can tailor their qualification to suit their career goals, prior experiences and personal interests.

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.

For example, in the performance evidence, the requirement includes, 'clients of varying ages, genders, and cultural background' instead of specifying particular genders.

The foundational skills are designed to apply to all learners regardless of background or protected attributes, no bias in language or expectations based on gender, race, disability, age, or other attributes and are capable of being supported with reasonable adjustments to promote access and equity.

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
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Yes, the 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 learners' schedules, or delivered through alternative methods such as online or practical demonstrations. Flexible assessment locations may include workplaces, simulated environments, or RTO settings, while format adjustments allow for flexibility in submission methods, with no specific instructions regarding written or oral submissions. These provisions help create an inclusive assessment environment that respects diversity and removes 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 (May 2026).
Date:	06/06/2025

Technical Writer/s

Name:	Jasmeet Kaur
Anti-discrimination Skills and Experience	-Holds TAE40122 Certificate IV in Training and Assessment -Participated in National Webinar, 'A Program of Social Inclusion for Young People with Disability', organised by VET Development Centre (VDC) on 23 August 2019 -Participated in professional development training by VCOS on 'How to be Disability Inclusive' in Feb. 2025 -Completed in-house online training: Anti-Discrimination Assessment Training in June 2025 -Completed a short course on Udemy, 'Cultural Awareness – Australian', focused on First Nations culture and protocols
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 the 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
HLT47425	Certificate IV in Audiometry
HLT57425	Diploma of Audiometry

Units of Competency (UoC)

UoC Code	UoC Title
HLTAUD007	Conduct basic audiometric testing
HLTAUD008	Conduct audiometric testing
HLTAUD009	Conduct audiometric screening for school age children
HLTAUD010	Assess and respond to occupational noise risk
HLTAUD011	Develop and implement individual hearing rehabilitation programs
HLTAUD012	Prescribe, select and fit hearing devices
HLTAUD013	Assist clients with management of hearing devices
HLTAUD014	Manage and remove cerumen

Skill Sets

Skill Set Code	Skill Set Title
HLTSS00088	Allied health assistance - Audiometry 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.