

# Guidelines for Supporting Disability Inclusion in Nationally Recognised Training Products



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# Acknowledgement of Country

ADCET is committed to the self-determination of First Nations peoples. We acknowledge the traditional custodians of all the lands across Australia and pay our deep respect to Elders past and present.

## Note on language

This resource uses person-first language (e.g., 'student with disability'), but this approach does not suit everyone, and many people prefer identity-first language (e.g., 'disabled student'). It is up to the individual how they choose to identify. We encourage you to ask individuals what they prefer. We also acknowledge the deep history behind all these terms.

## Disclaimer

The 'supporting students with disability resources' provide guidance on legislation and policy for Registered Training Organisations (RTOs) regarding vocational education and training for students with disability, but they should not be considered legal advice or impose additional legal obligations. RTOs should seek tailored legal advice to understand their specific obligations. More information on this disclaimer can be found at [adcet.edu.au/vet/disclaimer](https://adcet.edu.au/vet/disclaimer) or by contacting the [Department of Employment and Workplace Relations](#).

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# Introduction

The Australian Government launched *Australia's Disability Strategy 2021–2031* (the Strategy) on 3 December 2021. It was developed by all levels of government, together with people with disability, their families, carers and representatives. The Strategy will drive change over the next decade to uphold the rights, inclusion and participation of people with disability in all areas of Australian life.

Seven outcome areas were identified in the Strategy, including:

1. **Employment and financial security:** providing jobs and career opportunities for people with disability.
2. **Inclusive homes and communities:** increasing the number of accessible, affordable and well-designed homes and creating a community that is inclusive and accessible.
3. **Safety, rights and justice:** ensuring the rights of people with disability are promoted, upheld and protected, and people with disability feel safe and enjoy equality before the law.
4. **Personal and community support:** providing people with disability access to support so they can live independently and engage in their communities.
5. **Education and learning:** supporting people with disability to have access to education and learning throughout their lives so they reach their full potential.
6. **Health and wellbeing:** increasing support and capability in the healthcare sector to meet the needs of people with disability and ensuring disaster preparedness and emergency responses include the needs of people.
7. **Community attitudes:** ensure attitudes support equality, inclusion and participation in society for people with disability.

## Purpose

This project supports Strategy outcome 5: 'education and learning: supporting people with disability to access education and learning throughout their lives so they reach their full potential'.

These guidelines are developed with four main audiences in mind:

1. Accredited course and training product developers
2. Trainers, assessors, and other registered training organisation (RTO) staff
3. Accreditors, regulators, and approval bodies
4. Policy makers.

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These guidelines are designed to be used during all stages of VET development, implementation and for continuous improvement. This includes course and training package development and accreditation or approval, and course and program design.

These guidelines should be used as a reference when writing and developing VET products including accredited courses, training packages and RTO materials. It aims to provide support to ensure people with disability are considered during all stages of the range of processes.

At the end of each section, you will note there is a self-assessment checklist for each of the four audiences. This checklist can be applied to your practice to determine how you are considering people with disability in your processes.

To find further resources and information, please see the links below.

- [\*Australian Disability Clearinghouse on Education and Training \(ADCET\)\*](#)
- The [\*Department of Employment and Workplace Relations\*](#) website contains information relating to the development of training products
- The [\*Australian Skills Quality Authority \(ASQA\)\*](#) website contains regulatory information and can provide guidance for the development of training products
- The [\*Western Australian Training Accreditation Council\*](#) website has information to assist with any regulatory information and can provide guidance for the development of accredited courses

## Context

The [\*Disability Standards for Education 2005 \(Cth\) \(DSE\)\*](#) seeks to ensure that students with disability can access and participate in education on the same basis as students without disability. A primary objective of the DSE is to make rights and responsibilities in education and training easier to understand.

The DSE covers:

- enrolment
- participation
- curriculum development
- accreditation and delivery
- student support services
- elimination of harassment and victimisation.

The DSE clarifies the obligations of education and training providers, and the rights of people with disability under the [\*Disability Discrimination Act 1992 \(Cth\) \(DDA\)\*](#). More information about the DSE can be found at [\*Disability Standards for Education 2005\*](#).

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## Definition of inclusivity

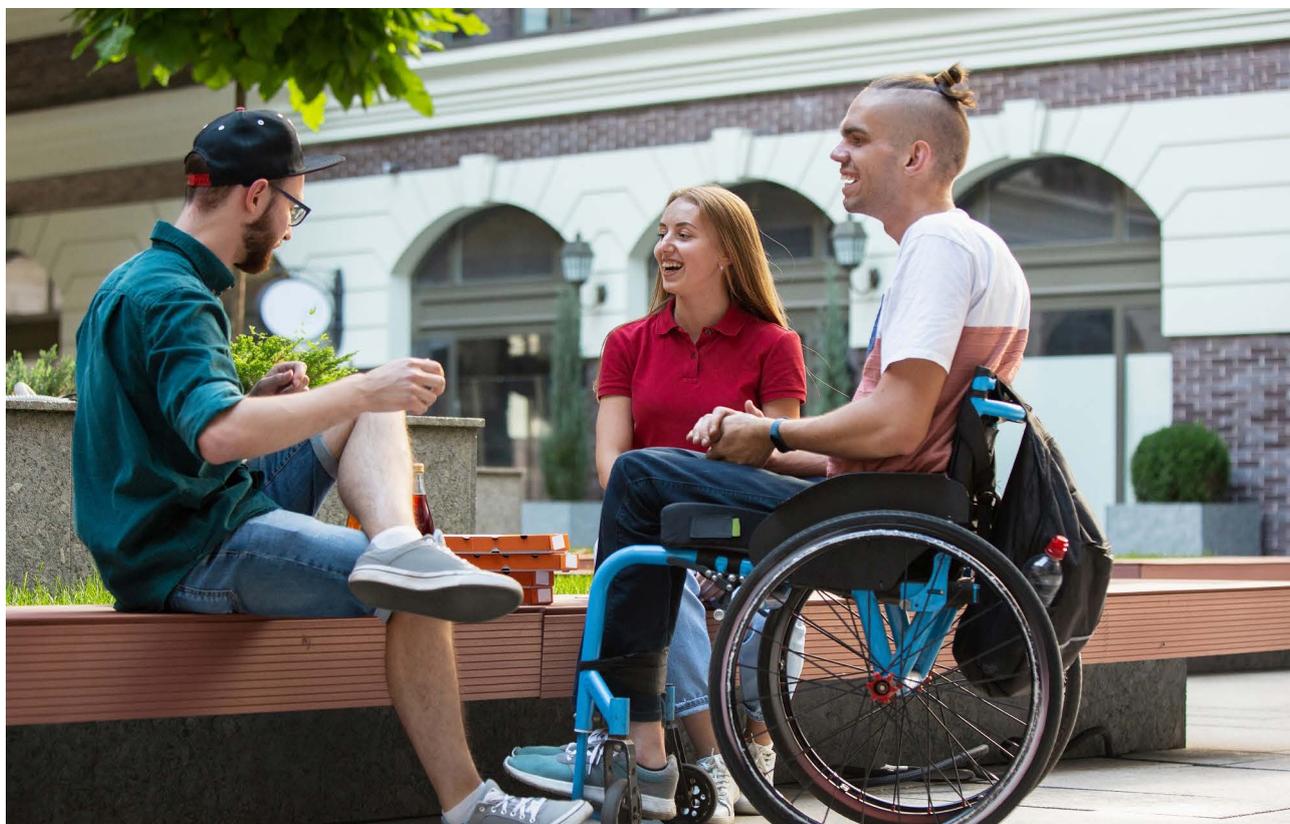
Inclusivity is the practice of providing equal access to opportunities and resources for people who might otherwise be excluded or marginalised. It is therefore important that throughout the range of VET processes, people with disability are included in the discussions and decisions.

It is the fact of including all types of people, things or ideas and treating them fairly and equally. A definition of inclusivity can be found at [Cambridge Dictionary](#).

## Representation of people with disability

To ensure that training products meet the needs of all users, it is important that people with a range of disabilities are consulted during the process of training package development. Diversity of stakeholders ensures all parties have a voice and can provide perspective that others may not have. To consult and actively involve people with disability will ensure that the needs of a broad range of stakeholders are considered throughout the processes with a view of breaking down barriers.

*Representation* matters because *people* matter and elevating the voice of people with disability is important. It is also an obligation under Australian law.



# Part 1: Accredited Course and Training Package Developers

The term 'accredited course developer' applies to a person or organisation who owns a course accredited with either the:

- [Australian Skills Quality Authority \(ASQA\)](#)
- [Victorian Registration and Qualifications Authority \(VRQA\)](#)
- [Training Accreditation Council \(TAC\) WA](#)

It may also include those in the process of currently developing a course ready for accreditation.

## Definitions

'Training product developer' refers to those developing or updating a training package product, in line with the policies set out in the Training Package Organising Framework.

For the purposes of this guide, the term 'training product' will be used to include all components of accredited courses and training packages.

## How to use this guide

Use this guide before, during and after development of an accredited course or training product. This guide is designed to help with ensuring inclusivity that focuses on people with disability. This includes, but may not be limited to, a range of documentation including:

- development of enterprise units of competency
- development of training package units of competency
- course accreditation, training package product submissions and associated documentation
- any other VET-related documentation.

This guide can provide you with information and prompts to help support engagement with people with disability as part of your processes.

## Inclusive language

Inclusive language means finding a way to name, honour and value diverse experiences and identities. Increasing our use of inclusion within the language we use means we

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can better understand the impact of our words. Language used unconsciously can lead to assumptions and can unintentionally reinforce dominant norms around gender, sexual orientation, race, class, **ability and disability**, age and more. The use of inclusive language creates an environment for flexibility and fairness.

Further information can be found at:

- [\*The Diversity Movement: Say This, Not That: A Guide for Inclusive Language\*](#)
- [\*ADCET: Inclusive Communication\*](#)

An example of primary rules for the use of inclusive language:

- **Put the person first.** For example, 'my student Tania who has Autism' instead of 'my autistic student, Tania'.
- **Limit the use of slang.** Using slang phrases excludes those who may not understand the terms used. A phrase may have a different meaning for another person.
- **Understand the correct use of mental-health-associated language.** Bipolar, post-traumatic stress disorder (PTSD) and obsessive-compulsive disorder (OCD) are real mental health diagnoses. Using these terms to describe everyday behaviours trivialises the impact of someone's real, lived experiences with a mental health illness. For example, your student who is feeling grumpy today does not have bipolar, they might simply be in a bad mood.
- **Be thoughtful about the imagery you display.** Consider representation of a wide range of people in materials displayed such as educational resources or marketing materials.
- **Ask if you aren't sure.** Don't make assumptions. Most people are happy to discuss the language they are comfortable with.



*Have you used person-first language in your course materials? It is essential to be aware of the use of language when developing the units of competency. The use of certain words can unintentionally create barriers for a student with disability and can affect their ability to demonstrate competence in a unit.*

## Consistency of wording across training products

It is important that contemporary wording is used consistently when developing training products. Currently, a number of units across the sector use a range of descriptions and labels when referring to people with disability, and they are not always appropriate or contemporary. For example:

- functional impairment or disability
- special needs
- additional needs.

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We recommend the following wording:

- People/person with disability e.g., person with autism
- People/person without disability
- People/person with lived experience of disability/[type of disability] e.g., person with a lived experience of mental health
- Person who experiences [type of disability] e.g., a person who experiences epilepsy or a person who uses a wheelchair
- People with disability or health condition e.g., person with ADHD, person with mobility issue, wheelchair user
- Person with hearing impairment, person who is Deaf, person who is hard of hearing, Deaf person
- People/person needing/requesting reasonable adjustments
- People/person with accessibility requirements.

You need to decide what is appropriate to use in your sector and area. Some units use client, person, individual. Whatever you choose, be consistent. If you are unsure, seek advice. Further information is available at [People with Disability Australia: Language Guide](#).

## Design and development of the training product

During the initial design and development phase of a training product, it is important to ensure that you consider inclusiveness and the needs of diverse learners – including those with disability – in your course structure, units of competency, assessment requirements and course documentation. This should be considered in your initial planning.

During the development of your training product, it is important to ensure you consult with stakeholders who can provide feedback on considerations for people with disability. This could be someone with disability or, if this is unable to occur, someone who has extensive knowledge and experience in the disability sector.

Ensure you have documented how you have considered people with disability and note whether any amendments have been made after this consideration. For course accreditation, this is also included in the [Application to Renew Course Accreditation \(ASQA\)](#) in section 3.3, about how you have incorporated people with disability.

Including a person with disability and/or someone with relevant experience on any stakeholder groups will ensure representation and an inclusion lens is used over the course during the development phase.

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## Units of competency

It is important to fully consider the development of a unit of competency in terms of core performance requirements, how these are articulated, how they align to a range of industry roles applicable to the qualifications in which they will appear, and whether the language used is inclusive. Sometimes, limited consideration of these elements and insufficient consultation with all stakeholders, including people with disability, can create unintentional barriers for people with disability.

## Using inclusive language in training products, including units of competency

Always ensure all units of competency are written using inclusive language, and you are aware of the unintentional barriers that language can cause from the way it is written and interpreted. It can potentially have a negative impact on the candidate for assessment purposes, and for this reason pay attention to the way units of competency and the assessment conditions are worded.

## Articulation and alignment to industry requirements and job roles

Units are often written in extremely narrow and prescriptive ways that don't always reflect the diversity and flexibility within job roles/industry. Simple changes can better support students with disability undertaking training and assessment.

### Example:

*A unit may have listed a very specific requirement in the performance evidence or performance criteria, such as a 'need to respond to a siren on a work site' and there is a view that this cannot be reasonably adjusted due to safety concerns. Therefore, a person with a hearing impairment, or where there is industrial noise that would limit people hearing a siren, means people would fail to meet unit requirements. An alternative wording for the criteria might be 'respond to an emergency cue' or something similar would still meet the intent of the unit and be more inclusive.*

## Use of language in training products, including performance requirements

There needs to be consideration of whether performance requirements should specify that learners must practically demonstrate a task, or whether it is only necessary for them to demonstrate an understanding of the task in order to be assessed as competent.

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## Examples:

*A unit of competency may specify that a candidate performs a physical task, such as lifting an item, which some candidates with physical disability may not be able to demonstrate. This task may also be achieved in industry in several different ways. In terms of competency the physical requirement may not be a key feature of all job roles relevant to that qualification. In this instance, consider using the term 'manage.' This means someone with disability can appropriately manage the situation instead of performing the task. They can direct another person to undertake the task and still demonstrate competence relevant to the job role.*

*Alternatively, a unit of competency may ask a learner to 'lift' an item as part of the performance evidence. By changing the word to 'shift' it then becomes more inclusive as there's not an assumption that the learner must physically move an object themselves.*

Some units of competency are also written in a way that uses inconsistent language, which can make it difficult for RTOs to interpret whether reasonable adjustments can apply.

## Example:

*Some units of competency require the student to provide evidence that they have 'managed' a task when in actual fact they may need to perform a task with specific prescriptions e.g. HLTAID011 Provide first aid states 'managed in line with ARC (Australian Resuscitation Council), the unconscious, non-breathing adult, including: performing at least 2 minutes of uninterrupted single rescuer cardiopulmonary resuscitation (CPR) (5 cycles of both compressions and ventilations) on an adult resuscitation mannequin placed on the floor.'*

The word may *manage* infers that they may be able to direct someone to complete the task on their behalf, while the prescriptions of the task indicate they must physically perform each element of the task.

The wording of the unit of competency should consistently reflect that this must be physically performed e.g., the student must provide evidence that they can physically and independently perform the following tasks.

The unit could also have further information about any possible reasonable adjustments, or where RTOs can seek further clarification and discuss course requirements and reasonable adjustments.

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## Consultation with stakeholders

During the development and accreditation stage, it is a requirement to undertake consultation with a range of stakeholders. Historically, this has been seen mainly as industry expertise to provide feedback. It is important to consult with a stakeholder or stakeholders who can provide feedback and guidance on accessibility and inclusivity for people with disability and other equity cohorts.

It is good practice for the range of development and accreditation processes to engage with people with disability. This will show there has been broad consultation and consideration given to a range of groups that can add a different perspective.

For example, by calling for expressions of interest or identifying suitable people to become members of committees, it demonstrates this commitment and strengthens your application. Most of all, it adds value to the application processes and provides the writer with insight and perspective. All product content must be inclusive and having an expert available demonstrates your commitment.



*Engage industry professionals, colleagues, and other volunteers to test for readability and the application of principles of inclusion.*

## Representation of people with disability

It is important there is representation of diverse groups – including people with disability – throughout the process. This ensures inclusivity is applied to the course/training product you are seeking accreditation for, and feedback can be provided. People with lived experience can add a perspective that others may not. Remember, this applies to all course and training product development and approval, regardless of content.

Representation is very important in the process as it elevates the importance of diversity and sends a clear message that there is a commitment to include people with disability. It is also important to factor in potential reimbursement for stakeholders that engage in their own time and have been sourced due to their specific knowledge. The disability sector deserves recognition and remuneration as appropriate.

## Checklist for accessible formats

Your documents should:

- use plain English
- include an easy-to-read font
- provide colour contrast between the text and background that is appropriate and easy-to-read
- use white space to break up content

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- use images to break up heavy text and ensure there is alternative text descriptions
  - ensure that alternative formats are available such as written, paper based, online or recorded (with captions for video materials provided).

## Accessible formats for consultation

As discussed, industry feedback and membership of key groups is important to ensure people with disability are heard and engaged in the processes. All engagement must be through formats that are accessible and meet the needs of the individual or group. You may need to consider providing additional supports at meetings or via electronic means. It is important to ask the individual or group what is needed and source those requirements so that engagement is authentic and respectful. Remember to always check the accessibility of buildings if you are holding face-to-face meetings.

## Industry feedback

For any application for accreditation or approval, industry feedback is an extremely important part of the process. This is gathered in many different ways, using a range of formats, and this is a prompt to remember to ensure you consider engagement with people with disability as part of industry. This may need to be targeted at particular services or groups, or even individuals. The perspective is required to ensure your course or training product development demonstrates inclusivity throughout your application. Any draft units can gather feedback and again screen for inclusivity to ensure any writing is not causing unnecessary barriers for people with disability.

## Documentation

As part of the development and accreditation phase, it is important to remember to keep sound documentation of every person's involvement, but also ensure that it is captured in a way that outlines the individual's contribution and is respectful and meaningful. These records will assist with the application process and will demonstrate that all avenues have been pursued and all points of view gathered. The body that assesses your application will want to see how the engagement has contributed to the process, and by documenting it in a way that is easy to read and understand it will strengthen your application.

## Review and act on feedback

Once consultation with stakeholders and industry has taken place and you have documented the range of contributions, the next steps are to ensure that the feedback is reviewed and acted upon. Every opinion is valued, and this should be clearly demonstrated. You should refer to the policies and guidelines that govern the development of training products for more specific information on the requirements to review and act on feedback.

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## Importance of feedback regarding inclusivity

It is important through the journey to accreditation or assurance that all feedback that is gathered is reviewed and responded to. Regardless of how the information is gathered, there should be a response to the author, delivered in a way that suits their individual needs. If feedback is provided electronically, consider a platform where electronic responses can be provided. If face-to-face, document actions and outcomes detailing whether the feedback was taken on board or not and explain why.

You may possibly obtain feedback that, after consideration, is unable to be actioned or taken on board, so the justification needs to be provided to the source. People are generally interested in how their feedback was actioned and if not, why not, so be prepared to have that conversation. You should refer to the policies and guidelines that govern the development of training products for more specific information on the requirements for responding to feedback.

It is strongly suggested that all training products go through a review for inclusivity. This applies to every aspect of the unit, training package, companion volumes, assessment requirements and implementation guides. There should be no barriers for people with disability, and language that is inclusive should be used. There are experts and resources available to help with this type of review. Currently, training package development is required to undertake an equity check as part of the regulatory process. However, it is strongly recommended that accredited course developers also seek their own.



*How have you ensured you use inclusive language throughout your training product development? And implemented the feedback received?*

During the process of designing and developing the accredited course or units of competency, engaging people with disability is important particularly when considering how the course or training product will be packaged, delivered, and assessed. By adopting an inclusive approach as shown above, barriers will be overcome and input from a range of stakeholders will help shape how the training product will look. Once programs are accredited, the application process for addition to RTO scope will take place or third-party discussions and arrangements may get underway.

As part of the development of the course document and in the future the training and assessment strategy, it is important to show how industry is engaged. Remember, people with disability are integral to this process. Record this information as explained above and use it as part of the submission process.

## Delivery and assessment within the training product documents

During the course accreditation process, you will be required to provide a high-level overview of your delivery modes and assessment strategy. Considerations relating to how delivery and assessment will take place are part of the design process. Note that

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this has typically been seen as an area that provides barriers to students with disability. When in the process of developing a new training product, it is essential to consider the language being used in the design of the assessment method.

The delivery mode should ensure that all students can access the same level of training and support (including resources) regardless of location, commitments, disability, and other support needs.

Questions to consider when completing this section of the documentation:

- Can reasonable adjustments be applied to the assessment strategy?
- Is the assessment strategy fair and flexible?
- Is there an option for undertaking assessment other than written (practical observation/project)?
- Is there careful consideration when using the words written and oral in describing the assessment method?
- Is there a mandated component and does this create any barriers?

Ensure that your stakeholder group (including disability representatives) endorse your delivery and assessment strategy within your course documentation.

## Technical writer capability and knowledge

Technical writing for VET is a specialised area that requires a particular skill as well as knowledge of a specific industry sector. If you have used a technical writer to assist with content development, it is essential you allow time to review the resources for inclusivity and amend these to ensure they are accessible for all learners.



*Take an opportunity to apply the self-assessment and ensure inclusive language and consultation has taken place within your course development. Ensure documents are written using inclusive language too.*

## Where to go for further support/guidance

There are a range of channels to pursue further information:

For accredited courses:

- [Australian Skills Quality Authority \(ASQA\)](#)
- [Victorian Registration & Qualifications Authority \(VRQA\)](#)
- [Training Accreditation Council \(TAC\) WA](#)

For training packages:

- [DEWR: Training packages](#)

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## Self-assessment 1: Accredited Course and Training Package Developers

Below is a self-assessment tool to assess how well you are doing to ensure inclusion in your documentation.

These questions provide prompts for you to consider and document how you have engaged with the disability community throughout your development phase.

They are open ended to ensure careful consideration rather than a tick-box approach.

- How have you ensured your stakeholder group has a representative/s from the disability community?
- How are you engaging with the disability community through the initial accreditation process?
- How have you established meaningful relationships within the disability community?
- How are you ensuring the diverse needs of people have been met throughout the process?
- How are you documenting all stakeholder feedback and making the relevant recommendations?
- How have you ensured all materials and information are in accessible formats?
- What have you done to ensure all training product documents (including units of competency) are written inclusively?
- How have you captured the voice of disability in the application documentation ready for the approval body?

# Part 2: Trainers, Assessors and other RTO Staff

These guidelines are intended to meet the needs of trainers, assessors and other RTO staff that are involved in the training product design and implementation phase. Ensure you acknowledge all RTO structures are included, such as small providers where the trainer may undertake all design and delivery/assessment, to large RTOs that may have a dedicated quality area.

## Definitions

Trainers, assessors and other RTO staff work together to design and deliver training packages. For the purposes of this guide, the term 'trainer' will be used to include all staff involved in training, assessing and supporting the RTO.

## How to use this guide

Use this guide before, during and after implementation of a training product. This guide is designed to help with the application of the principles of inclusivity throughout all documentation including:

- development of course design and resource development
- development of compliance and RTO documentation such as unit outlines, student handbooks, training, and assessment strategies
- development of assessment tools
- any other VET-related documentation.

## Checklist for accessible formats

Your documents should:

- use plain English
- include an easy-to-read font
- provide colour contrast between the text and background that is appropriate and easy-to-read
- use white space to break up content
- use images to break up heavy text and ensure there is alternative text descriptions
- ensure that alternative formats are available such as written, paper based, online or recorded (with captions for video materials provided).

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## Quality aspects

During the development of the product for delivery, it is a requirement to undertake consultation with a range of stakeholders. Historically, this has been seen mainly as industry expertise to provide feedback. It is important to consult with a stakeholder or stakeholders who can provide feedback and guidance on accessibility and inclusivity for people with disability and other marginalised groups. This can be in the form of training and assessment strategy input and endorsement, assessment pre-validation and delivery materials.

It is good practice to engage with people with disability regularly around your product design and implementation. This will show that there has been broad consultation and consideration given to a range of groups that can add a different perspective. By calling for expressions of interest or identifying suitable people to become members of committees, for example, it demonstrates this commitment and also strengthens your quality management.

## Writing of documentation and learning/assessment resources

By adopting the principles of stakeholder engagement above, barriers will be overcome and input from a range of stakeholders will help shape how the training product will look. Once programs are accredited, the application process for addition to RTO scope will take place or third-party discussions and arrangements may get underway. As part of the development of the course document and in the future the training and assessment strategy, it is important to show how industry is engaged. Remember that people with disability are integral to this process. Record this information as explained above and use it as part of the submission process.

## Inclusive language

Inclusive language means finding a way to name, honour and value experiences and identities. Increasing our use of inclusion within the language we use means we can better understand the impact of our words. Language used unconsciously can lead to assumptions and unintentionally reinforce dominant norms around gender, sexual orientation, race, class, ability and disability, age and more. The use of inclusive language creates an environment for flexibility and fairness. Further information can be found at [\*The Diversity Movement: Say This, Not That: A Guide for Inclusive Language\*](#).

An example of primary rules for the use of inclusive language:

1. **Put the person first.** For example, 'my student Tania who has Autism' instead of 'my autistic student, Tania'
2. **Limit the use of slang.** Using slang phrases excludes those who may not understand the terms used. A phrase may have a different meaning for another person. This applies to all learning and assessment materials, marketing materials and RTO documentation.

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3. **Understand the correct use of mental-health-associated language.** Bipolar, post-traumatic stress disorder (PTSD) and obsessive-compulsive disorder (OCD) are real mental health diagnoses. Using these terms to describe everyday behaviours trivialises the impact of someone's real, lived experiences with a mental health disorder. For example, your student who is feeling grumpy today does not have bipolar, they might simply be in a bad mood.
  4. **Be thoughtful about the imagery you display.** Consider representation of a wide range of people in materials displayed such as educational resources or marketing materials.
  5. **Ask if you aren't sure.** Don't make assumptions. Most people are happy to discuss the language they are comfortable with. Get to know your group of learners.

## Inclusive communication and language checklist

Your documents should include:

- plain language
- a communication style which is relevant to the target audience
- accessible formats relevant to target audience
- images, flags or symbols explained (including using alt text)
- images which reflect and empower community
- font which is easy-to-read
- readable layouts
- empowering and inclusive language.

## Delivery and assessment method including learning environment

Consider whether the learning environment is suitable for your diverse group of learners. This begins by getting to know your class. Remember to use the lists above.



*Create a universally designed training product suitable for a range of users.*

Some things to consider in the learning environment include:

- access including utilities such as kitchens and toilet facilities
- furniture and set-up of classroom
- format of learning materials:
  - print outs/paper based
  - online

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- displayed resources (material presentation, videos, handouts etc.)
  - coloured paper
  - availability of assistive technology. These links have more information:
    - [ADCET: Assistive Technology](#)
    - [ADCET: Creating Accessible Content](#)

## Universal Design

Universal Design is set of principles to ensure the design of products and environments are useable by all people, to the greatest extent possible, without the need for adaptation and specialised design. It originally applied to buildings, products and environments and later extended to technology, education and service provision through the development of the principles of Universal Design for Learning (UDL) and Universal Design for Education.

- **Principle 1 Equitable Use:** The design is useful and marketable to people with diverse abilities.
- **Principle 2 Flexibility in Use:** The design accommodates a wide range of individual preferences and abilities.
- **Principle 3 Simple and Intuitive Use:** Use of the design is easy to understand, regardless of the user's experience, knowledge, language skills, or current concentration level.
- **Principle 4 Perceptible Information:** The design communicates necessary information effectively to the user, regardless of ambient conditions or the user's sensory abilities.
- **Principle 5 Tolerance for Error:** The design minimizes hazards and the adverse consequences of accidental or unintended actions.
- **Principle 6 Low Physical Effort:** The design can be used efficiently and comfortably and with a minimum of fatigue.
- **Principle 7 Size and Space for Approach and Use:** Appropriate size and space is provided for approach, reach, manipulation, and use regardless of user's body size, posture, or mobility.

Universal Design for Learning (UDL) ensures inclusive design and development. It helps embrace learner variability, designs for it, and reduces barriers to learning which creates a greater sense of belonging. In learning contexts, UDL recognises that there is no one-size-fits-all solution and applies these principles to all aspects of developing learning pedagogy, resources, materials and approaches to the benefit of all learners.

Some useful resources include:

- [ADCET UDL and inclusive teaching resources](#)
- [ADCET UDL eLearning module](#)

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- Universal Design for Learning (UDL) developed by [CAST](#)
  - Universal Design for Education (UDE) and Universal Design for Instruction (UDI) developed by Sheryl Burgstahler at [DO-IT, University of Washington](#).

## Reasonable adjustments

Reasonable adjustments is a legislative term that, for VET, refers to a measure or action taken by an education provider to enable learners with disability to participate in education and training on the same basis as learners without disability.

*As part of the RTO's compliance obligations with Clause 8.5 of the Standards for Registered Training Organisations (RTOs) 2015 (Cth), RTOs must meet the requirements of the Commonwealth Government's Disability Discrimination Act 1992 (Cth) (DDA) and the Disability Standards for Education 2005 (Cth) (DSE), which require education providers to ensure learners with disability or ongoing ill health are able to access and participate in education and training. Section 4(1) of the DDA defines reasonable adjustments as 'an adjustment to be made by a person is a reasonable adjustment unless making the adjustment would impose an unjustifiable hardship on the person.*

*Department of Employment, Small Business and Training. (2018). QLD.*

For further information on reasonable adjustments, please see: [Reasonable adjustment in teaching, learning and assessment for learners with disability: a guide for VET practitioners](#)

## Review/feedback including validation

A review for inclusion should be included as part of the pre-assessment validation process. Although pre-assessment validation is not a requirement under the *Standards for Registered Training Organisations (RTOs) 2015 (Cth)*, it is still good practice to undertake. This ensures all assessment tools are demonstrating inclusive language and align with Universal Design principles to limit the creation of unintentional barriers within your assessment tools prior to their use.

Include reasonable adjustments as part of post-assessment validations. This ensures that trainers and RTOs are comfortable and actively applying reasonable adjustments as per the *Standards for Registered Training Organisations (RTOs) 2015 (Cth)* and are doing so consistently.

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## Self-assessment 2: Trainers, Assessors and other RTO Staff

Below is a self-assessment tool to assess how well you are doing to ensure inclusion in your documentation.

These questions provide prompts for you to consider and document how you have engaged with the disability community throughout your delivery and assessment. They are open ended to ensure careful consideration rather than a tick-box approach.

1. How have you ensured any stakeholder groups have a representative/s from the disability community?
2. How are you engaging with the disability community through your validation process?
3. How have you established meaningful relationships within the disability community?
4. How are you ensuring the diverse needs of people have been met throughout your delivery and assessment and other RTO operations?
5. How are you documenting all stakeholder feedback and making the relevant changes?
6. How have you ensured all materials and information are in accessible formats?
7. What have you done to ensure all training product documents are written inclusively?
8. How have you captured the voice of disability in your training product?



# Part 3: Accreditors, Regulators and Approval Bodies

These guidelines support accreditors, regulators and approval bodies to ensure training products are inclusive for people with disability.

## Definitions

For the purposes of these guidelines, we are defining accreditation and approval bodies as the regulatory bodies listed below:

- [Victorian Registration and Qualifications Authority \(VRQA\)](#)
- [Training Accreditation Council \(TAC\)](#), Western Australia
- [Australian Skills Quality Authority \(ASQA\)](#)
- [Department of Employment and Workplace Relations \(DEWR\)](#)

Authorisation by these bodies is the final step in the accreditation and approval process.

## How to use this guide

Use this guide during the accreditation or endorsement process. It is designed to provide prompts for the application of the principles of inclusivity throughout all documentation that has been submitted, including:

- course documentation applications
- enterprise units of competency
- qualification information
- other course documentation.

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## Review the submission for inclusivity

It is important that all submissions are reviewed for inclusivity to ensure there are no barriers for people with disability. This means considering:

- ableist language, titles, and names
- gendered language
- unintentional bias
- industry acceptable language
- consistency in wording being used
- negative or judgmental statements.

It is anticipated that prior to submission the developer/s will have consulted widely with stakeholders, and good practice will show that the disability community is part of the stakeholder group. Evidence of this level of engagement should be seen as standard practice. An application should show that diversity has been considered through the process, and it is recommended that this engagement is reviewed as part of the application.

Units of competency need to be thoroughly reviewed for inclusivity. Look in detail at each part of the unit that is being proposed as there are often unintended barriers as developers write to meet the requirements of what may be in the template. Here are some notes against what might be included in the template for consideration.

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## Unit information

<b>Unit title</b>	A title that concisely describes the outcome and uses inclusive language in the title.
<b>Application</b>	Ensure diversity has been included in any wording.
<b>Prerequisite unit (optional)</b>	This is typically optional; however, check that it does not cause any unintended barriers. Does the prerequisite unit require demonstration of any particular skills that could pose a barrier in this context?
<b>Elements</b>	Check the wording is inclusive and contemporary in all statements.
<b>Performance criteria</b>	Are they clear? Unambiguous? Do they use contemporary and inclusive language? Make sure statements use inclusive language and are consistent across all units. For example, when using the word client or person, consider which is most appropriate.
<b>Range of conditions</b>	In specifying different work environments and conditions that affect performance, this needs to be extremely clear so there are no unintended barriers.
<b>Foundation skills</b>	<p>Describes language, literacy and employment skills that are essential to performance in the workplace. If foundation skills are not explicit in the performance criteria and the applicant opts to list these in the description column, ensure that these do not create unintentional barriers in the wording that is used. For example, if oral communication is included this limits students who may be able to demonstrate the skill using another communication method.</p> <p>If writing is used but is not a requirement of the job outcome, can the student type/text instead?</p>

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## Assessment requirements

<b>Performance evidence</b>	Ensure wording is inclusive and the task can be demonstrated flexibly while still maintaining integrity of the unit.  Is it a physical task and if so, does it need to be?  Is it a requirement for the job role?
<b>Knowledge evidence</b>	Check the wording is inclusive and contemporary in all statements.  Is representation of disability and other marginalised groups included?  If there is reference to legal systems and frameworks, are the disability-related laws and legislation included?
<b>Assessment conditions</b>	Are there mandatory conditions relevant to the job role? Do these create unintentional barriers?

## Providing recommendations

Ensure you model industry accepted terminology including the use of inclusive language in your responses.

Some responses may include:

- identifying unintentional barriers and providing suggestions on the removal or improvement of these
- providing recommendations and suggestions on the amendment to language used in the training product to ensure inclusivity
- providing further supports or advice for developers to access resources.

In conclusion, it is important to take the opportunity to create a new standard of practice that removes unintentional barriers for students and creates a culture of inclusivity.

The accreditation and approval process are the last step before implementation with students, so it is essential that inclusivity has been considered.

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## Self-assessment 3: Accreditors, Regulators and Approval Bodies

Below is a self-assessment tool to assess how well you are doing to ensure inclusion in your documentation.

These questions provide prompts for you to consider and document how the training product developers engaged with the disability community and considered any feedback. They are open ended to ensure careful consideration rather than a tick-box approach.

1. How have you ensured the submission you are reviewing includes documented consultation with a disability representative?
2. Is the application and proposed training product inclusive, providing equal opportunities for all diverse learners?
3. Are the training products inclusive and the language used consistent and contemporary?
4. Is the delivery mode and assessment method inclusive, fair, and flexible?
5. Has consideration been given to ensure any mandatory work placement is undertaken in an inclusive site?
6. Are the principles of inclusivity applied to the training product?
7. Are the foundation skills and assessment requirements within the enterprise units of competency written in a way to remove barriers?
8. Where legislation is referenced, are disability related laws and legislation included?
9. Have the access and equity requirements for the training product been met?
10. Are your recommendations written in an inclusive way, modelling industry language?

## Part 4: Policy Makers

These guidelines are intended to meet the needs of policy and decision-makers that are involved in developing and overseeing policy implementation at a strategic level in VET. The intent is to serve as a reminder to ensure that policies have been developed and screened appropriately for inclusivity, particularly disability. This could also apply to RTO policy makers that have responsibility for ensuring systems are developed in an inclusive way and subsequent policies and procedures do not cause unintentional barriers for diverse learners.

### Definitions

Policy development within VET could refer to a range of contexts, from development of standards and operating frameworks and the establishment of strategic stakeholder groups through to government systems and RTO operating frameworks. Policy development is a key function to ensure goals and objectives are articulated and implemented appropriately. In the context of disability, this means to ensure effective consultation takes place, as many policy responses have a direct impact on people with disability.

### How to use this guide

Use this guide during every stage of policy development and implementation regardless of context. It can be used as a reference point to ensure your policy development and implementation procedure is inclusive and considerate of people from diverse backgrounds. Sometimes a policy can have an unintended consequence or create a barrier for people with disability in the way it is developed, written, and implemented.

### Engagement

Policy development typically has five main stages:

1. planning
2. development
3. review
4. implementation
5. final review.

Within each stage there is an opportunity to engage and consult widely with stakeholders and the disability community. Evidence of this level of engagement should be seen as standard practice, and the development of policy should show that diversity has been considered throughout the process.

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It is important that engagement occurs with people with a diverse range of disabilities, who are knowledgeable in identifying and eliminating attitudinal and physical barriers encountered by persons with disability. Diversity of stakeholders ensures all parties have a voice and can provide perspective that others may not have. To consult and actively involve people with disability will ensure that the needs of a broad range of stakeholders are considered throughout the processes with a view to breaking down barriers.

Removing barriers so that people with disability can engage in the policy development process is extremely important. In the self-assessment, we have provided some prompts to ensure that you are providing an accessible and engaging environment. You must work collaboratively with people with disability, their families and support workers, community service providers and any other advocacy group, particularly when policy will impact people with disability directly.

At times you may need to undertake a considerable public engagement exercise to gather feedback regarding a particular policy. You need to ensure that the disability community is well represented, and that feedback and consultation occurs. If there is a proposed policy that could have a significant or direct impact on people with disability or other diverse groups of people specifically, then even more so. The strategies to engage with people with disability in a significant public engagement require careful thought and planning.

## Engagement strategy checklist

- Decide on the breadth of the engagement.
- How relevant is it to people with disability?
- How can people best get involved?
- What is your engagement strategy? What type of consultation (e.g., one at a time, groups, document based) will work best?
- Are the facilitators experienced?
- Is the site accessible? Does the site have access to assistive technology?
- Is there any conflict of interest?
- Are the documents accessible? Are they written in plain English? Are they available in various formats?
- Do you and the team understand the issue?
- Are you prepared? Has the distribution of information occurred in a timely manner?
- Have you committed to providing feedback and outcomes to those participants?

If you can address these points prior to any public engagement, you will be well prepared, and your session will run smoothly. Remember to record all in attendance and respond accordingly.

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## Writing inclusively

It is important to review all proposed policies and other documentation for inclusivity to ensure there are no barriers for people with disability. Decide on the language to be used and apply this consistently, using contemporary wording.

This means reviewing for:

- ableist language, titles and names
- gendered language
- unintentional bias
- industry acceptable language
- consistency in wording being used
- negative or judgmental statements.

Language usage has a significant impact on workplace culture and, ultimately, the messaging that you want to send. It creates an acceptable standard within the workplace and more broadly the sector if the policy is going to be applied across a range of contexts.

Inclusive language means finding a way to name, honour and value experiences and identities. Increasing our use of inclusion within the language we use means we can better understand the impact of our words. Language used unconsciously can lead to assumptions and unintentionally reinforce dominant norms around gender, sexual orientation, race, class, **ability and disability**, age and more. The use of inclusive language creates an environment for flexibility and fairness.

More information on inclusive language can be found at:

- [\*The Diversity Movement: Say This, Not That: A Guide for Inclusive Language\*](#)
- [\*ADCET: Inclusive Communication\*](#)

An example of primary rules for the use of inclusive language:

- **Put the person first.** For example, 'my student Tania who has Autism' instead of 'my autistic student, Tania'.
- terms used. A phrase may have a different meaning for another person.
- **Understand the correct use of mental-health-associated language.** Bipolar, post-traumatic stress disorder (PTSD) and obsessive-compulsive disorder (OCD) are real mental health diagnoses. Using these terms to describe everyday behaviours trivialises the impact of someone's real, lived experiences with a mental health disorder. For example, your student who is feeling grumpy today does not have bipolar, they might simply be in a bad mood.
- **Be thoughtful about the imagery you display.** Consider representation of a wide range of people in materials displayed such as educational resources or marketing materials.

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- **Ask if you aren't sure.** Don't make assumptions. Most people are happy to discuss the language they are comfortable with.



*Does your organisation have an inclusion policy? Does it include using inclusion principles when writing policy? Remember to write any policies in plain English, be concise, clear, avoid jargon and long paragraphs. But above all, make sure your policy has been screened for inclusive language and that diverse groups have had authentic engagement in the development and implementation of your policy.*

## Leadership

As the policy development process is undertaken, it is important that senior level leaders within organisations take a leadership role in ensuring inclusion for people with disability, therefore creating a new culture that is inclusive and recognises diversity. This involves:

- familiarity with policy development and the importance of stakeholder engagement
- knowledge of the principles of Universal Design
- increasing representation of people with disability in the workforce
- co-design principles and practices as they relate to policy development
- inclusion of people with disability in policy development should be articulated in your organisation's workplace inclusion and/or diversity action plans
- a sound review process that acts on feedback
- knowledge of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)
- working with partners that share the same values.

Policy leadership is important. It sets the scene, the culture and creates accountability. Modelling of effective policy development processes and procedures will ensure that the voices of marginalised and diverse groups, including those with disability, are heard and valued. An effective leader will challenge the status quo and seek to continually ask the question regarding consultation and engagement.

By applying the self-assessment and keeping yourself and everybody else accountable, the environment will better support people with disability and their engagement in policy.

## Further resources and guidance

It is recommended that resources are accessed through reputable and current sites. The [ADCET website](#) provides support and resources that will assist you.

Many consultants have expertise in inclusive practices. Their help can also be sourced to support policy development.

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## Self-assessment 4: Policy Makers

Below is a self-assessment tool to assess how well you are doing to ensure inclusion in your documentation.

These questions provide prompts for you to consider and document how you have engaged with the disability community throughout your development and implementation of policies.

They are open-ended to ensure careful consideration, rather than a tick-box approach.

1. How have you ensured your stakeholder group has a representative/s from the disability community?
2. Are the documents available in other formats including assistive technology?
3. How have you established meaningful relationships within the disability community?
4. How are you ensuring the diverse needs of people have been met throughout the process?
5. How are you documenting all stakeholder feedback and making the relevant recommendations and amendments to your policy?
6. Have you ensured your policy contains inclusive language and removes any unintentional barriers?
7. What have you done to ensure all information including the policy itself is written inclusively?
8. Do your committees and other structured groups have meaningful and respectful disability representation?
9. Is there a planned public engagement exercise?
10. If so, revisit the suggestions in the guidelines.
11. Are people with disability that are involved being remunerated accordingly?
12. Does your organisation have an inclusion policy? Does it include using the principles of inclusion when writing policies?
13. Are your leaders aware of their role within policy development processes?
14. Are all organisation staff aware of the United Nations Convention of the Rights of Persons with Disabilities?
15. Are you aware of where to seek further support and guidance?

