

Policy & Procedure

REASONABLE ADJUSTMENT POLICY & PROCEDURE

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Responsible Person:	CEO	Reviewed by:	CEO
NRCHI Area:	Operational / RTO	Review Date:	Oct 26
Approved and adopted by:	Board of Governance	Next Review Date:	Oct 29

Scope

This policy applies to all NRCHI staff involved in student enrolment, training, assessment and support, including the CEO, Training Coordinator, trainers and assessors.

It applies to all students enrolled in NRCHI VET programs who request, disclose or are identified as potentially requiring reasonable adjustments or additional learning support.

The policy applies throughout the student journey, including enrolment, the Pre-Training Review, training, assessment, work placement where applicable, and completion.

Purpose

North Ringwood Community House (NRCHI) is committed to providing equitable access to quality vocational education and training (VET). This policy establishes the framework for identifying, considering, implementing and reviewing reasonable adjustments for students with disability.

The purpose of reasonable adjustments is to enable students to participate in training and assessment on an equal basis with other students and demonstrate the competencies required by their training product without compromising assessment integrity, safety or required competency outcomes.

NRCHI may also provide learning support and other adjustments to assist students experiencing additional barriers to participation, in accordance with its relevant policies and procedures.

This policy should be read in conjunction with NRCHI's Assessment Policy, Enrolment Policy and Access & Equity Policy.

Policy Statement

NRCHI recognises that students may require reasonable adjustments to access and participate in training and assessment because of disability or other identified barriers to learning. A student is not required to disclose more personal information than is reasonably necessary to consider and implement appropriate support.

NRCHI will:

- Consider each request individually and in consultation with the student.
- Support students to disclose a disability if they wish to do so
- Identify appropriate adjustments having regard to the student's needs, preferences, circumstances and the requirements of the training product.
- Implement agreed adjustments as soon as reasonably practicable.
- Maintain the integrity, validity and fairness of assessment and ensure all required competencies are demonstrated.
- Consider available resources, safety, the interests of others and applicable legal obligations when determining whether an adjustment is reasonable.

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- Explain decisions to students where a requested adjustment is not appropriate or cannot reasonably be provided, and consider suitable alternatives.
- Protect the confidentiality of information relating to students' disability, health, learning needs and adjustment arrangements.
- Monitor and review adjustments in consultation with students where necessary.

Reasonable adjustments may include assistive technology, accessible learning materials, additional time where appropriate, rest breaks, a suitable assessment environment, adjusted delivery pace, interpreters, support persons, changes to the physical learning environment and alternative assessment methods where permitted by the training product.

Reasonable adjustments must not remove or change the competency outcomes, essential skills, required knowledge, assessment conditions or evidence requirements specified by the training product.

Adjustments will be made where reasonable and appropriate. Where a proposed adjustment raises concerns about feasibility, safety, assessment integrity or unjustifiable hardship, NRCHI will consider the individual circumstances, consult with the student and explore alternative arrangements before making a decision.

Responsibilities

CEO

The CEO ensures appropriate systems, resources and oversight are available to support the implementation of this policy.

Training Coordinator

The Training Coordinator coordinates consultation with students and relevant staff, considers adjustment options and documents agreed arrangements and decisions. The Training Coordinator communicates relevant arrangements to authorised staff who need the information to implement them, monitors implementation, coordinates reviews and escalates matters to the CEO when required.

Trainers and Assessors

Trainers and assessors identify and refer potential support needs to the Training Coordinator, implement agreed adjustments within their responsibilities and ensure training and assessment remain consistent with the requirements of the training product. They also raise concerns about the effectiveness, safety or appropriateness of an adjustment.

Students

Students are encouraged to discuss their support requirements and preferences and participate in planning and reviewing arrangements where they wish to do so. Students are also encouraged to inform NRCHI if an adjustment is ineffective or their circumstances change, where they feel comfortable doing so.

Definitions

Reasonable adjustment

A measure or action taken to enable a student with disability to access and participate in training, assessment, facilities and services on the same basis as a student without disability. Adjustments are considered in consultation with the student, having regard to individual circumstances, the requirements of the training product and applicable legal obligations.

Disability

Disability as defined under the Disability Discrimination Act 1992 (Cth), including physical, intellectual,

psychiatric, sensory, neurological and learning disabilities, as well as other conditions covered by the legislation.

Assessment integrity

The requirement that assessment produces valid, reliable and sufficient evidence of a student's competence against the requirements of the training product, including applicable assessment conditions and evidence requirements.

Unjustifiable hardship

A legal consideration under applicable disability discrimination legislation concerning whether providing a particular adjustment would impose unjustifiable hardship on the education provider. It is considered separately from whether an adjustment is reasonable, and must be assessed in accordance with the applicable legislation and the circumstances of the individual case.

Pre-Training Review (PTR)

A process undertaken before enrolment or commencement, as applicable, to identify a student's existing competencies, suitability for the course, and potential support needs or barriers to learning.

Additional learning support

Support provided to address learning, language, literacy, numeracy, digital literacy or other identified barriers to participation. Such support may be provided under NRCHI's relevant policies even where the circumstances do not involve disability.

Identifying Support Needs

Support needs may be identified:

- During enrolment or the Pre-Training Review.
- Through information voluntarily provided by the student.
- During training or assessment, where a student experiences difficulty accessing or participating in learning.
- When a student requests assistance at any stage of their course.

Where a potential support need is identified, the Training Coordinator will arrange a confidential discussion with the student. Staff should not attempt to diagnose a disability or make assumptions about a student's abilities based on an actual or perceived disability.

Students may request adjustments after their course has commenced. Requests will be considered at that time and will not be rejected solely because they were not identified during enrolment.

NRCHI will not routinely require a student to provide medical evidence or a formal diagnosis before discussing possible adjustments. Where further information is reasonably necessary to determine a suitable arrangement, NRCHI will explain why the information is needed, what information may assist and how it will be handled.

Reasonable Adjustments Overview

Adjustments will depend on the student's circumstances and the requirements of the training product. Options may include:

- Assistive technology or accessible digital resources.
- Plain English instructions or accessible learning materials.
- Additional time, rest breaks or appropriate scheduling flexibility.
- A quiet or otherwise suitable training or assessment environment.
- Adjustments to the pace or delivery of training.

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- Interpreters, communication assistance or a support person, where appropriate.
- Physical access arrangements or changes to the learning environment.
- Alternative assessment formats or methods, where consistent with the training product.
- Additional learning support, referrals or other suitable support services.

The list is not exhaustive. NRCHI will consider other appropriate options in consultation with the student.

Adjustments must enable the student to demonstrate the required competency. They must not lower the required standard or remove an essential skill, knowledge requirement, assessment condition or safety requirement.

Where a proposed adjustment is not suitable for a particular assessment, NRCHI will consider whether another method or arrangement can address the student's barrier while preserving the required outcomes.

Procedure

NRCHI will use the following straightforward procedure to ensure reasonable adjustments are considered and managed consistently.

Step 1 - Identify and discuss

The Training Coordinator will discuss the student's support needs with them confidentially. The discussion will explore the barriers the student is experiencing, the support they consider helpful and any relevant training or assessment requirements.

The student may request support at any stage of their course. Where appropriate, the Training Coordinator may consult the relevant trainer or assessor and seek further advice with the student's involvement.

Step 2 - Consider suitable adjustments

The Training Coordinator, in consultation with the student and relevant trainer or assessor, will consider possible adjustments.

Considerations include:

- The student's individual needs and preferences.
- The requirements of the training product and assessment tasks.
- The validity of assessment and the competency outcomes required.
- Safety, feasibility and available resources.
- Whether alternative arrangements could achieve the intended purpose.

Where further information is reasonably necessary, NRCHI will explain the reasons to the student and discuss what information would assist in making a decision.

Step 3 - Agree and document arrangements

The Training Coordinator will document agreed adjustments in a support plan, training plan or other approved student record.

The record should include, where relevant:

- The adjustment to be provided and its purpose.
- The training or assessment activities to which it applies.
- Implementation responsibilities and arrangements.
- Any relevant review date or circumstances requiring review.

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The arrangements will be discussed with the student and communicated to relevant staff on a need-to-know basis.

Step 4 - Implement and monitor

Trainers and assessors will implement agreed adjustments within their responsibilities. The Training Coordinator will oversee implementation and assist with any issues.

NRCHI will aim to implement agreed arrangements as soon as reasonably practicable, taking account of the student's needs and upcoming training or assessment activities.

If an adjustment is ineffective, circumstances change or a concern arises about safety or assessment integrity, the Training Coordinator will discuss the matter with the student and relevant staff and consider appropriate alternatives.

Step 5 - Review and record

Adjustments will be reviewed where necessary, including when:

- The student requests a review.
- The student's circumstances or support needs change.
- The adjustment is not achieving its intended purpose.
- Training, assessment or workplace requirements change.
- Monitoring identifies a need for different arrangements.

Changes will be discussed with the student, documented and communicated to relevant staff.

Limitations and alternative arrangements

NRCHI will consider each request individually and take reasonable steps to identify a suitable adjustment.

Where a proposed adjustment cannot reasonably be provided, is not appropriate for the relevant training product, or would compromise an essential competency, assessment condition or safety requirement, NRCHI will:

- Consult with the student about their needs and concerns.
- Explain the reasons for its decision as soon as reasonably practicable.
- Consider alternative adjustments, support arrangements or appropriate referrals.
- Document the decision, its reasons, alternatives considered and any agreed next steps.

Where unjustifiable hardship is being considered, NRCHI will assess the relevant circumstances and applicable legal requirements. The decision will not be based solely on inconvenience, assumptions about disability or a general preference for existing arrangements.

The CEO will be consulted where the matter involves significant expenditure, substantial operational change or an escalated decision.

Confidentiality

Information about a student's disability, health, learning needs and adjustment arrangements will be treated confidentially and managed in accordance with NRCHI's Privacy Policy, Confidentiality Policy and applicable privacy requirements.

NRCHI will:

- Collect only information reasonably necessary for the relevant support purpose.
- Explain why additional information is requested, where applicable.
- Limit access to authorised staff who need the information to implement or oversee support arrangements.
- Avoid unnecessary disclosure of a student's personal circumstances to other students or staff.
- Securely store and dispose of records in accordance with applicable requirements.

Information will only be disclosed where authorised or required by law or otherwise permitted under applicable privacy requirements. See **NRCHI's Confidentiality Policy**.

Complaints and Appeals

Students who are dissatisfied with a decision about reasonable adjustments, or who believe agreed arrangements have not been implemented appropriately, may raise their concerns through NRCHI's Complaints and Appeals Policy.

Complaints and appeals will be handled fairly, confidentially and without prejudice. Students will not be disadvantaged for raising a concern in good faith.

Where appropriate, NRCHI will review the adjustment decision or implementation arrangements while the complaint or appeal is being considered.

Related Documents

Enrolment Policy
Enrolment Form
Pre Training Review Policy
Pre Training Review
Student Handbook
Access & Equity Policy
Complaints & Appeals Policy
Complaints & Appeals Form
Confidentiality Policy
Assessment Policy
LLND Policy
Staff and Trainer Handbook
Training Plan
Student Support Policy
Privacy Policy

Related Legislation and Compliance

Victorian Registration and Qualifications Authority (VRQA) *Guidelines - Standards for Vocational Education and Training Providers*, including the **2025 Standards for Registered Training Organisations (RTOs)**

Skills First program requirements and applicable VET Funding Contract

Applicable Commonwealth and State Government Funding Agreements, Contracts and Guidelines

Applicable VET legislation, data reporting requirements and regulatory instruments.

Occupational Health and Safety Act 2004 (Vic)

Equal Opportunity Act 2010 (Vic)

Disability Discrimination Act 1992 (Cth)

Disability Standards for Education 2005 (Cth)

Privacy Act 1988 (Cth)

Privacy and Data Protection Act 2014 (Vic)



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Health Records Act 2001 (Vic)

Document Locations

Electronic file folders accessible by NRCH Administration staff
Policy and Procedure Manual

Date reviewed	Version	Details of changes (if any)	Date of next review
3/4/2025	3	Substantial reformatting and inclusion of definitions, limitations of adjustments and detailed procedure	April 2028
Oct 26	4	Revision of policy to improve clarity, comply with VRQA Guidelines and 2025 Standards for RTO's and reformat	Oct 29