



Access and Equity Policy

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1. Purpose

The purpose of this Policy is to provide a framework for delivering and maintaining training and workplace services that reflect fair and reasonable opportunities for all stakeholders—students, clients, staff, and job applicants—regardless of their background or individual characteristics.

Orange College (OC) is committed to fostering an inclusive and supportive environment where all individuals are able to participate fully and equitably, free from discrimination, harassment, bullying and vilification.

The objectives of this Access and Equity Policy are to:

- Attract and retain the best possible employees;
- Provide a safe, respectful and flexible work and learning environment; and
- Deliver services in a way that supports equitable access and reasonably accommodates individual circumstances.

For VET students, this Policy also supports compliance with Outcome Standards 2.4, 2.5, and 2.6 of the Standards for RTOs 2025 by ensuring that:

- Students are supported and encouraged to voluntarily disclose disability, if they wish to do so, in a safe and respectful environment;
- Reasonable adjustments are made, where appropriate, to support equal access to training and assessment;
- When adjustments are not possible or appropriate, students are informed of the reasons as soon as reasonably practicable;
- The wellbeing needs of student cohorts are identified through the development of Training and Assessment Strategies (TAS), especially where course content may be emotionally sensitive or triggering;
- Students are informed of the availability of wellbeing support services as part of OC's broader commitment to access, equity, and learner wellbeing;
- The learning environment actively promotes safety, inclusivity, and respectful peer and staff interactions, supported by clearly defined behavioural expectations and professional conduct; and
- OC recognises the importance of culturally safe learning environments for First Nations learners and commits to ensuring they feel respected, included, and heard in all aspects of training and engagement

These practices reflect OC's commitment to both regulatory compliance and the creation of an equitable, learner-centered training experience.

2. Policy Statement

OC is committed to delivering quality training and assessment products and services in compliance with the Standards for Registered Training Organisations (RTOs) 2025. Equity, inclusion, and respect for diversity underpin all College activities, regardless of whether it involve students, staff, or third-party partners.

OC ensures that all services are delivered in a fair, respectful, and bias-free manner, and that all individuals, regardless of their background or circumstances, are supported to fully engage in OC's learning or work environment.

OC is committed to providing flexible learning and assessment options, allowing clients alternatives which recognise the diversity of their individual needs and circumstances, aiding them in their learning goals.

This commitment is underpinned by the following principles:

- **Respect.** OC promotes respect for every individual and acknowledges diverse backgrounds, experiences, and perspectives.
- **Equity.** OC strives to ensure fair treatment, access, and opportunity for all, taking proactive steps to remove barriers to participation.
- **Cultural Safety.** OC is committed to creating a culturally safe environment that acknowledges and respects the identities, cultures, and histories of First Nations peoples and culturally and linguistically diverse (CALD) communities.

We uphold this commitment by:

- 1) Ensuring recruitment practices encourage applications from people of all backgrounds, with selection based on merit, qualifications, and capability, free from discrimination
- 2) Educating all newly recruited staff on OC's diversity, equity, and inclusion policies during induction
- 3) Providing ongoing diversity and inclusion training to all staff as part of continuous professional development
- 4) Providing training and assessment policies and procedures incorporate access and equity principles;
- 5) Ensuring equitable access to learning opportunities, support services, and facilities for all individuals, including, but not limited to, those of different genders, age, race, religion, culture, linguistic background, marital status, geographic location, socio-economic background, disability, sexual preference, family responsibility or political conviction;
- 6) Upholding ethical, transparent, and non-discriminatory enrolments, employments, and service processes, ensuring fairness and compliance with Equal Opportunity legislation;
- 7) Offering equitable access to training resources, facilities, equipment, support services, information, training and assessment personnel, materials, assessment opportunities, training opportunities;
- 8) Recognising the wellbeing needs of the student cohort and ensuring students are informed of available support services and how to access them, as part of OC's broader access and equity; and
- 9) Fostering a learning environment that is inclusive, respectful, and safe for all students, including specific strategies to ensure culturally safe engagement and support for First Nations learners.

3. Definitions

The following terms are defined for the purpose of consistent interpretation and implementation of this policy in alignment with the intent of the Standards for RTOs 2025, Disability Standards for Education 2005, and Sex Discrimination Act 1984, among others.

3.1 Access and equity

Access and equity refers to OC's commitment to ensuring that its training and assessment is responsive to the individual needs of clients whose age, gender, cultural or ethnic background, disability, sexuality, language skills, literacy or numeracy level, unemployment, imprisonment or remote location may present a barrier to access, participation and the achievement of suitable outcomes.

3.2 First Nations People

First Nations people refer to the Aboriginal and Torres Strait Islander peoples who have identified themselves or have been identified by a representative (e.g. their parent or guardian) as being of Aboriginal and/or Torres Strait Islander descent. First Nations peoples are the First Peoples of Australia and represent a diversity of communities, languages, cultures, and traditions. They are not a single group but comprise hundreds of distinct cultural groups with their own histories and identities.

3.3 Culturally and Linguistically Diverse

Culturally and linguistically diverse (CALD) refer to individuals or groups were born, raised, or belong to families where languages other than English are spoken, or where cultural traditions, customs, or belief systems differ from those commonly practised in Australian society.

3.4 Neurodivergent

Neurodivergent people are people whose brains process information, communicate, or learn in ways that differ from the general population. This can include variations such as autism, ADHD, learning disorders, and other cognitive differences.

3.5 People who may identify as LGBTIQ+

LGBTIQ+ is a collective term for people whose sexual orientation, gender identity, or physical sex characteristics differ from the social expectations of binary gender or heterosexual norms. This group includes but is not limited to lesbian, gay, bisexual, transgender, intersex, queer, and other gender or sexuality-diverse individuals.

3.6 Discrimination

Discrimination occurs when a person is treated less favourably than others due to the person's circumstances, characteristics or beliefs. Discrimination may be direct or indirect, and both forms are not tolerated at OC.

1) Direct Discrimination

Direct discrimination takes place when a person, organisation or group of persons is treated less fairly than others in the same or similar situation on the basis of stereotyped beliefs or views.

2) Indirect Discrimination

Indirect discrimination includes rules, practices or policies which appear to be non-discriminatory and equally applicable, but operate in such a way that certain groups of people are excluded without just cause.

3.7 Workplace Harassment

Harassment is any behaviour which is unwelcome, offends, humiliates or intimidates a person and causes the work environment to become unpleasant. Harassment can rise from a single incident or a pattern of behaviour and may be verbal, non-verbal, physical, or psychological in nature. If a person is being harassed, then their ability to do their work is affected as they often become stressed and suffer health problems.

Harassment may result from behaviour, which is not intended to offend or harm, such as jokes or unwanted attention; however, this does not mean that it is lawful.

3.8 Sexual Harassment

Includes unwelcome conduct of a sexual nature in circumstances in which it could reasonably be expected to make a person feel offended, humiliated or intimidated. A reasonable person, having regard to all the circumstances, would have anticipated that the person harassed would be offended, humiliated or intimidated.

Sexual harassment can occur regardless of intent and may involve people of any gender. It can occur in person, via digital communications, or through visual or written materials. It can occur among peers or co-workers, and in subordinate-supervisor, supervisor-subordinate or staff-student, student-staff, student-student situations.

The most common form of harassment is sexual harassment. Examples of sexual harassment include, but are not limited to:

- 1) Unwanted touching
- 2) Sexual innuendo propositions
- 3) Nude pin-ups and posters
- 4) Obscene telephone calls
- 5) Wolf whistles

3.9 Verbal Harassment

Verbal harassment involves spoken words or comments that offend, demean, or intimidate a person. It can occur in one-on-one setting, group settings, or through electronic communication. Examples of verbal harassment include, but are not limited to:

- 1) Sexual comments, advances or propositions
- 2) Lewd jokes or innuendos
- 3) Racist comments or jokes
- 4) Spreading rumours
- 5) Comments or jokes about a person's disability, pregnancy, sexuality, age or religion
- 6) Repeated questions about one's personal life
- 7) Belittling someone's work or contribution in a meeting
- 8) Threats, insults or abuse
- 9) Offensive obscene language
- 10) Obscene telephone calls, unsolicited letters, faxes and emails

3.10 Non-Verbal Harassment

Non-verbal harassment consists of offensive actions or materials that do not involve speech but create an intimidating, hostile, or offensive environment. Examples of non-verbal harassment include, but are not limited to:

- 1) Leering (e.g. staring at a woman's breasts)
- 2) Putting offensive material on notice boards, computer screen savers and emails
- 3) Wolf whistling
- 4) Nude or pornographic posters
- 5) Displaying sexist or racist cartoons or literature
- 6) Demoting, failing to promote, or transferring someone because they refuse requests for sexual favours
- 7) Following someone home from work

- 8) Standing very close to someone or unnecessarily leaning over them
- 9) Mimicking someone with a disability
- 10) Practical jokes that are unwelcome
- 11) Ignoring someone, or being cold and distant to them
- 12) Crude hand or body gestures

3.11 Physical Harassment

Physical harassment refers to unwanted physical interactions that cause discomfort, distress, or fear. It may include deliberate acts of aggression or inappropriate physical contact. Examples of physical harassment include, but are not limited to:

- 1) Unwelcome physical contact such as kissing, hugging, pinching, patting, touching, or brushing up against a person
- 2) Indecent or sexual assault or attempted assault
- 3) Hitting, pushing, shoving, spitting, or throwing objects at a person
- 4) Unfastening a person's attire

3.12 Workplace Bullying

Workplace bullying is repeated and unreasonable behaviour that is directed toward an employee, or group of employees, that creates a risk to health and safety e.g. physical and/or verbal abuse, excluding or isolating individuals; or giving impossible tasks. Bullying may be verbal, physical, social, or psychological, and can be carried out by one person or a group. It is not limited to managers or staff. It may also occur between students or across different roles within the organisation.

OC provides equal opportunity in employment to people without discrimination based on a personal characteristic protected under state and federal equal opportunity legislation.

Under State legislation they include:

- age
- breastfeeding
- carer status
- disability
- employment activity
- gender identity
- industrial activity
- lawful sexual activity
- marital status
- parental status
- personal association with someone having any of these characteristics
- physical features
- political activity/belief

- pregnancy
- race
- religious activity/belief
- sex
- sexual orientation

Any employee found to have contravened this policy will be subject to disciplinary action, which may include dismissal as outlined in the complaint procedure below.

Employees must report any behaviour that constitutes sexual harassment, bullying or discrimination to their manager.

Employees will not be victimised or treated unfairly for raising an issue or making a complaint.

4. Policy Principles

OC promotes a safe and inclusive environment that values fairness, respect, and equal opportunity. These principles are embedded across all areas of our operations and are further articulated in the following subsections:

4.1 Access and Equity Principles

OC upholds the principles of access and equity in all its operations. These principles guide our engagement with students, staff, contractors, and clients in training, assessment, service delivery, and workplace practices.

- 1) OC abides by access and equity principles.
- 2) OC will respect a client's right to privacy, confidentiality and be sensitive to client needs.
- 3) OC provides equal opportunity for all learners and is responsive to the individual needs of clients whose gender, pregnancy, race, marital status, sexuality, age, family/carer responsibilities, disability, transgender, political conviction, cultural or ethnic background, linguistic background, religious belief, geographic location, socio-economic background, employment/unemployment, imprisonment may present a barrier to access, participation and achievement of suitable outcomes.
- 4) At enrolment, OC staff will proactively identify and respond to the individual needs of clients. Clients will be asked to identify personal needs or circumstances that may exist and for which they may require additional support (See [Enrolment Policy](#)).
- 5) OC will ensure that all staff, employees, and contractors have access to the information and support needed to prevent discrimination, sexual harassment, bullying and violence, victimization, and vilification or to deal with it appropriately if it occurs.
- 6) OC seeks to create a learning environment where all students are respected and can develop their full potential.
- 7) All clients are given fair and reasonable opportunity to attend and complete training.
- 8) All staff are given fair and reasonable opportunity to participate in relevant decision-making processes and the allocation of resources and services as required to fulfil their duties and responsibilities.
- 9) Deficiencies will be investigated to determine whether a breach or policy deficiency exists. Should a discrepancy be proven, the impact of that breach or deficiency will be identified along with how the policy should be amended to eliminate the breach or deficiency in the future.

- 10) All perceived deficiencies in the Access and Equity Policy are to be documented, assessed and reviewed by the CEO / Authorised Representative of the College.
- 11) OC will demonstrate its commitment by:
- a) Selecting students according to a fair and non-discriminatory process
 - b) Making its training relevant for a diverse student population
 - c) Providing suitable access to facilities and resources
 - d) Providing appropriate support services
 - e) Providing appropriate complaints procedures
 - f) Consulting with relevant industry groups
 - g) Raising staff, contractor and student awareness of equity issues.

4.2 Equal Opportunity

OC is an equal opportunity company and actively supports participation for individuals from diverse backgrounds, including, but not limited to:

- Aboriginal and Torres Strait Islanders;
- People with a disability;
- People from non-English speaking backgrounds;
- People in transition and other special groups (i.e. people re-entering the workforce, long term unemployed, sole parents, people with literacy problems, and those who have been institutionalised);
- Women;
- People from regionally isolated communities.

4.3 Cultural Safety and First Nations Inclusion

OC recognises the unique position of Aboriginal and Torres Strait Islander peoples as the First Peoples of Australia and is committed to providing a culturally safe learning and working environment. This includes:

- Acknowledging Country on the OC website, during College events, and at formal gatherings
- Encouraging enrolment and employment opportunities for First Nations individuals
- Providing access to culturally appropriate support services and referrals
- Ensuring all OC staff complete cultural awareness training sessions to promote respectful and inclusive practices.

OC is committed to providing a culturally safe learning environment for all individuals. This includes respecting the unique cultural identities of First Nations peoples, people from culturally and linguistically diverse backgrounds, and all members of our College community. A culturally safe environment is one where individuals feel respected, valued, and supported to express their cultural identity without fear of discrimination or exclusion.

4.4 Special Needs/Considerations

- 1) Prior to enrolment, clients intending to enrol for training with OC are requested to advise the College if they have any disability, physical or other impairment, which may adversely affect their ability to successfully undertake training and assessment.
- 2) OC encourages voluntary disclosure of disabilities, conditions, or any 'special needs' that may affect a student's learning, to ensure appropriate support and reasonable adjustments can be provided. The purpose of collecting this information is solely to create an inclusive training environment where every student can participate on an equal basis.
 - a. Students may disclose their needs at any time, including during orientation, via the enrolment form, or by arranging a private meeting with Student Support Officers or Training Coordinators. All disclosures are handled confidentially and without judgment.
 - b. OC Staff are trained to create inclusive, respectful environments and will offer appropriate opportunities for students to discuss their support needs.
- 3) OC, in collaboration with the Client, will assess the potential for the Client to successfully complete the training which may include flexible delivery options to optimise the ease and benefit of the Clients' learning. However, no compromise to the integrity of the assessment against competency will be allowed. Examples of reasonable adjustments are provided in the subsequent section of this policy.
- 4) Clients with a disability are required to have the ability to fulfil the core requirements of the units of competence to attain the relevant award. However, it is recognised that flexibility in arrangements may need to be implemented.

4.5 Reasonable adjustments

Reasonable adjustments are changes that allow people with a disability to work safely and productively. OC will make reasonable adjustments for a person with a disability who:

- applies for a job, is offered employment, or is an employee, and
- requires adjustments in order to participate in the recruitment process or perform the genuine and reasonable requirements of the job.

Examples of reasonable adjustments can include:

- reviewing and, if necessary, adjusting the performance requirements of the job
- arranging flexibility in work hours (see 'flexible work arrangements')
- purchasing screen reading software for employees with a vision impairment
- approving more regular breaks for people with chronic pain or fatigue
- buying desks with adjustable heights for people using a wheelchair

When thinking about reasonable adjustments, OC will weigh up the need for change with the expense or effort involved in making it. If making the adjustment means a very high cost or great disruption to the workplace, it is not likely to be reasonable.

In some cases, OC can discriminate on the basis of disability if:

- the adjustments needed are not reasonable, or

- The person with the disability could not perform the genuine and reasonable requirements of the job even if the adjustments were made.

4.6 Language, Literacy, Numeracy and Digital Skills

- 1) Each Training Package sets a minimum requirement in language, literacy, numeracy, and digital skills (as applicable) of learners with which OC must abide.
- 2) The College makes appropriate concessions for language, literacy and numeracy issues of clients where these concessions do not compromise the requirements of the relevant Training Package and the integrity, equity and fairness of assessment.
- 3) Where a Client is deemed, either prior to enrolment or throughout the training program, to possess a lower level of language, literacy or numeracy than is the minimum requirement for the requirements of the Training Package, OC will provide appropriate advice and support to the Client regarding further learning options. At times, further language or literacy development or remedial assistance may be required to be completed prior to the continuation or completion of the Client's course of study.

4.7 Inclusive Learning Materials and Communication

All training, assessment and communication materials will be reviewed regularly to ensure they are culturally appropriate, inclusive, and accessible to students. This applies to:

- Students from CALD backgrounds
- First Nations students
- Individuals who identify as LGBTIQ+
- Neurodivergent students
- Students from diverse socio-economic backgrounds

Reasonable adjustments will be made where required, in line with OC's policies and procedures, to ensure equal participation without compromising assessment integrity.

4.8 Addressing Harassment, Bullying, and Discrimination

OC does not tolerate harassment, bullying, vilification, or discrimination in any form within its learning or work environments. Allegations relating to inappropriate conduct, whether between students, staff, or third parties, will be managed promptly and fairly.

All complaints regarding harassment, bullying, or discrimination must be addressed through OC's formal [Complaints and Appeals Policy](#), which outlines the procedures for:

- Lodging a complaint
- Accessing internal and external review processes
- Ensuring procedural fairness, confidentiality, and protection from victimisation

OC is committed to fostering a learning and work environment that is respectful, culturally safe, and free from unlawful conduct. Support services and resources are available for any student or staff member who requires assistance during the complaint process.

5. Orange College Responsibilities

OC has a legal and moral obligation to provide equal opportunity in an environment free from discrimination for staff, contractors and clients to ensure that discrimination/harassment does not occur in the workplace.

OC will:

- Maintain policies and procedures for equal opportunities for all staff, contractors and clients;
- Disseminate policies and procedures to staff, contractors and clients;
- Examine all policies and practices, as they affect staff, contractors and clients to ensure the elimination of discrimination and harassment;
- Ensure that there is no discrimination against any individual client or group of clients or staff, in access to facilities, products and services;
- Educate staff and contractors on the general goals and philosophy of equal opportunity together with the rationale for policies and practices which are adopted;
- Eliminate sexist and other discriminator language from all publications and discourage the use of such language in all printed material and in the speech of its staff, contractors and clients;
- Establish and maintain mechanisms to deal with complaints.

5.1 Director Responsibilities

- The College directors and managers are responsible for client equity.
- The Director will not condone nor engage in discriminatory/harassing behaviour.
- The Director is responsible for ensuring that all staff are aware of this policy and that complaints will be dealt with in accordance with the terms of the Complaints and Appeals Policy.
- The Director(s) and Manager(s) are to ensure staff act according to this policy and all clients are made aware of their rights and responsibilities pursuant to this policy.
- The Director will maintain the confidentiality of all complaints. If the Director feels that they are not the appropriate person to deal with the complaint, they will refer the matter to either a member of the management team or an external independent party for review and/or action.

5.2 Staff, Contractors and Clients Responsibilities

OC staff, contractors and clients have the responsibility to:

- Provide a learning environment that respects diversity and promotes inclusion;
- Support a culturally safe learning environment, particularly in relation to First Nations peoples and other culturally diverse groups
- Act to prevent harassment, discrimination and victimization against others;
- Respect differences among other staff, clients and contractors, such as cultural and social diversity;
- Treat people fairly, without discrimination, harassment or victimization;
- Respect the rights of others;
- Respect people's rights to privacy and confidentiality;

- Refuse to join in with these behaviours;
- Supporting the person in saying no to these behaviours;
- Acting as a witness if the person being harassed decides to lodge a complaint;
- Observe site rules or behaviour guidelines set by OC for its Trainers/Assessors;
- Behave in a manner that does not interfere with the learning of others; and
- Conduct themselves in a responsible manner while in training;
- Ensure the rights of all clients to have their say, balanced with the responsibility to listen to others and allow others to have their say.

If an OC staff, contractor or client feels harassed, bullied or otherwise a victim of unwelcome behaviour, the staff, contractor or client is encouraged to inform the person where the behaviour is unwanted, unacceptable and/or offensive. If the staff, contractor or client feels unable to approach the person, or if the behaviour continues following their request that the behaviour cease, the Director should be contacted.

6. Legislation

This policy is guided by relevant legislation, including, but not limited to, the following:

- National Vocational Education and Training Regulator Act 2011 (NVR Act) - Commonwealth
- Vocational Education and Training Accreditation Act 1990 (New South Wales)
- Education and the Education and Training Reform Act 2006 (Victoria)
- Vocational Education and Training Act 1996 (Western Australia)
- Vocational Education, Training and Employment Act 2000 (Queensland)
- Training and Skills Development Act 2008 (South Australia)
- Training and Workforce Development Act 2013 (Tasmania)
- Age Discrimination Act 2004 (Commonwealth)
- Disability Discrimination Act 2009 (Commonwealth)
- Racial Discrimination Act 1975 (Commonwealth)
- Sex Discrimination Act 1984 (Commonwealth)
- Discrimination Act 1991 (Australian Capital Territory)
- Disability Services Act 1991 (Australian Capital Territory)
- Anti-Discrimination Act 1977 (New South Wales)
- Anti-Discrimination Act (Northern Territory)
- Anti-Discrimination Act 1991 (Queensland)
- Equal Opportunity Act 1994 (South Australia)
- Sex Discrimination Act 1994 (Tasmania)
- Anti-Discrimination Act 1998 (Tasmania)

- Equal Opportunity Act 2010 (Victoria)
- Disability Act 2006 (Victoria)
- Equal Opportunity Act 1984 (Western Australia)
- ESOS Act 2010
- National Code 2007
- ELICOS Standards

7. Records Management

All documentation regarding complaints concerning Access and Equity matters is maintained in accordance with Records Management Policy. (See Records Management Policy)

8. Monitoring and Improvement

All Access and Equity practices are monitored by the College's CEO / Authorised Representative, and areas for improvement are identified and acted upon. (See Continuous Improvement Policy)