

## 1. Purpose

The purpose of this Policy is to provide a frame of reference in providing and maintaining training services that reflect fair and reasonable opportunity for all VET students, regardless of their diversity; allowing everyone to freely participate in the learning environment free from discrimination, harassment, bullying and vilification, including antisemitism.

## 2. Policy Statement

AAMC Training Group is committed to providing quality training and assessment products and services in compliance with the 2025 Standards for Registered Training Organisations' (RTOs).

AAMC Training Group promotes, encourages and values equity and diversity with regard to VET students. AAMC Training Group will ensure services offered are provided in a fair and equitable manner to all VET students, free from bias.

AAMC Training Group is committed to providing flexible learning and assessment options, allowing VET students alternatives which recognises the diversity of their individual needs and circumstances aiding them in their learning goals.

AAMC Training Group will ensure:

- a) all training and assessment policies and procedures incorporate access and equity principles;
- b) all VET students have equitable access to the benefits of training and assessment irrespective of their gender, age, race, religion, culture, linguistic background, marital status, geographic location, socio-economic background, disability, sexual preference, family responsibility or political conviction;
- c) all nominations and enrolments into training courses and programs will be conducted at all times in an ethical and responsible manner, ensuring fairness and compliance with Equal Opportunity legislation; and
- d) all VET students have equitable access to training resources, facilities, equipment, support services, information, training and assessment personnel, materials, assessment opportunities, training opportunities.

## 3. Definitions

The following words and expressions have the following specific meaning:

**3.1 Access and equity** means policies and approaches aimed at ensuring that VET is responsive to the individual needs of VET students 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 Discrimination

Discrimination occurs when a person is treated less favourably than others due to the person's circumstances, characteristics, or beliefs.

#### a) Direct Discrimination

Direct discrimination takes place when a person, organisation or group of people are treated less fairly than others on the basis of stereotyped beliefs or views.

b) 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.

### **3.3 Workplace Harassment**

Harassment is any behaviour which is unwelcome, offends, humiliates, or intimidates a person and causes the work environment to become unpleasant. 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.

### **3.4 Sexual Harassment**

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

- a) Unwanted touching
- b) Sexual innuendo propositions
- c) Nude pin-ups and posters
- d) Obscene telephone calls
- e) Wolf whistles

Sexual harassment can occur among peers or co-workers, and in subordinate-supervisor, supervisor-subordinate or staff-student, student-staff, student-student situations.

### **3.5 Verbal Harassment**

Examples of verbal harassment include, but are not limited to:

- a) Sexual comments, advances, or propositions
- b) Lewd jokes or innuendos
- c) Racist comments or jokes
- d) Spreading rumours
- e) Comments or jokes about a person's disability, pregnancy, sexuality, age, or religion
- f) Repeated questions about one's personal life
- g) Belittling someone's work or contribution in a meeting
- h) Threats, insults or abuse
- c) Offensive obscene language
- d) Obscene telephone calls, unsolicited letters, faxes, and emails

### **3.6 Non-Verbal Harassment**

Examples of non-verbal harassment include, but are not limited to:

- a) Leering (e.g., staring at a woman's breasts)
- b) Putting offensive material on notice boards, computer screen savers and emails
- c) Wolf whistling
- d) Nude or pornographic posters
- e) Displaying sexist or racist cartoons or literature
- f) Demoting, failing to promote, or transferring someone because they refuse requests for sexual favours
- g) Following someone home from work
- h) Standing very close to someone or unnecessarily leaning over them
- i) Mimicking someone with a disability
- j) Practical jokes that are unwelcome
- k) Ignoring someone, or being cold and distant to them
- l) Crude hand or body gestures

### **3.7 Physical Harassment**

Examples of physical harassment include, but are not limited to:

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

## **4. Policy Principles**

AAMC Training Group will not accept any form of discrimination, and we will apply the following principles in support of access and equity:

### **4.1 Access and Equity Principles**

- a) AAMC Training Group abides by access and equity principles.
- b) AAMC Training Group will respect a VET student's right to privacy, confidentiality and be sensitive to VET student needs.
- c) AAMC Training Group provides equal opportunity for all learners and is responsive to the individual needs of VET students 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.
- d) At enrolment, VET students will be asked to identify personal needs or circumstances that may exist and for which they may require additional support (See Enrolment Policy).

- e) AAMC training will ensure that all staff, employees, and contractors have access to the information and support needed to prevent discrimination, sexual harassment, bullying and violence, victimisation, and vilification, including antisemitism, or to deal with it appropriately if it occurs.
- f) AAMC Training Group seeks to create a learning environment where all students are respected and can develop their full potential.
- g) All VET students are given fair and reasonable opportunities to attend and complete training.
- h) All staff are given fair and reasonable opportunities to participate in relevant decision-making processes and the allocation of resources and services as required to fulfil their duties and responsibilities, including undertaking cultural competency training and performing trauma-informed teaching practices.
- i) AAMC Training Group will consult with First Nations industry experts to review and develop training and assessment materials.
- j) 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.
- k) All perceived deficiencies in the Access and Equity Policy are to be documented, assessed, and reviewed by the Director AAMC Training Group.
- l) AAMC Training Group will demonstrate its commitment by:
  - i. Selecting students according to a fair and non-discriminatory process
  - ii. Making its training relevant for a diverse student population
  - iii. Providing suitable access to facilities and resources
  - iv. Providing appropriate support services
  - v. Providing appropriate complaints procedures
  - vi. Consulting with relevant industry groups
  - vii. Raising staff, contractor, and student awareness of equity issues.

## **4.2 Equal Opportunity**

AAMC Training Group is an equal opportunity company and does not discriminate against or favours target groups in either recruiting or training, unless prescribed by funding contracts.

Target groups are defined as:

- First Nations peoples;
- People with a disability;
- Culturally and linguistically diverse (CALD) people;
- 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 Special Needs/Considerations**

- a) VET students intending to enrol for training with AAMC Training Group are requested prior to enrolment to advise AAMC Training Group if they have any disability, physical or other impairment which may adversely affect their ability to successfully undertake training and assessment.
- b) VET students are encouraged to discuss with AAMC Training Group any 'special needs' and/or 'reasonable adjustments' to the study environment which they consider are necessary or would assist them in the performance of their studies.
- c) AAMC Training Group, in collaboration with the VET student, will assess the potential for the VET student to successfully complete the training which may include flexible delivery options to optimise the ease and benefit of the VET students' learning. However, no compromise to the integrity of the assessment against competency will be allowed.
- d) VET students 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

### **4.4 Language, Literacy and Numeracy**

- a) Each Training Package sets a minimum requirement in language, literacy, and numeracy, skills of learners, with which AAMC Training Group must abide.
- b) AAMC Training Group makes appropriate concessions for language, literacy, and numeracy issues of VET students where these concessions do not compromise the requirements of the relevant Training Package and the integrity, equity, and fairness of assessment. Where a VET student 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, AAMC Training Group will provide appropriate advice and support to the VET student 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 VET student's course of study.

### **4.5 Digital Literacy and Access**

AAMC Training Group recognises that digital literacy is an essential skill for participation in online and blended training programs. At enrolment, VET students will be asked to self-assess their ability to use technology required for their course. Where a digital literacy gap is identified, AAMC Training Group will provide guidance, training, or alternative arrangements to ensure equitable access to learning resources, assessments, and communication tools.

### **4.6 Harassment**

- a) Harassment will not be tolerated at AAMC Training Group. If harassment occurs, the person responsible will be subject to disciplinary procedures. Disciplinary action will be taken against any staff or VET student involved in such behaviour. This may include termination of employment and removal of the VET student from the training course.
- b) Serious cases of harassment may constitute a criminal offence.
- c) AAMC Training Group will not tolerate behaviour which is considered to be sexual harassment and expects all staff, contractors, and VET students to treat each other with dignity and respect.

#### **4.7 Bullying and Violence**

- a) AAMC Training Group will not tolerate bullying or violent behaviour and expect all staff, contractors and VET students to treat each other with dignity and respect.
- b) AAMC Training Group recognises that bullying and violence demeans and infringes the rights of individuals and groups, damaging the work and learning environment.

#### **4.8 Vilification**

AAMC Training Group will not tolerate behaviour which vilifies another person and expects all staff, contractors, and VET students to treat each other with dignity and respect.

#### **4.9 Complaints**

- a) AAMC Training Group encourages informal resolutions of discrimination, sexual harassment, bullying and violence, victimization, and vilification grievances in the first instance, as close to the source as possible, with the option of conciliation or investigation of the complaint if necessary.
- b) Complaints will be investigated in a confidential manner and action will be taken to ensure that the discrimination/harassment stops. Appropriate warning or disciplinary action will be taken where harassment is found to have occurred.
- c) Those responsible for advising, conciliating, or investigating a complaint must act fairly and impartially, they must act without bias and avoid any conflict of interest. The respondent must be given a fair opportunity to know the case against him or her and to be given the opportunity to make a considered response.
- d) All staff, VET students and contractors involved with the AAMC Training Group's complaint procedures will be treated with respect and courtesy. Enquiries and complaints will be dealt with in a sensitive, equitable, fair, and confidential manner. All attempts will be made to deal with matters expeditiously while ensuring all parties are provided with sufficient time to prepare and or respond.
- e) AAMC Training Group acknowledges that it is of paramount importance and in the best interests of all parties that confidentiality is maintained during these procedures.
- f) AAMC Training Group encourages the reporting of behaviour that breaches equal opportunity policies but will not tolerate vexatious or frivolous complaints.

#### **4.10 Victimization**

- a) For complaints to be brought forward, complainants must feel secure in the knowledge that the AAMC Training Group procedures will be followed without fear of reprisal.
- b) AAMC Training Group will not victimise or treat any person unfairly for making a harassment complaint.
- c) AAMC Training will not tolerate behaviour of victimisation of another person and expects all staff, contractors, and VET students to treat each other with dignity and respect.
- d) Any complaint of victimisation will be treated in the same manner as a complaint of discrimination, sexual harassment, or vilification.

## 5. AAMC Training Group (RTO) Responsibilities

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

AAMC Training Group will:

- Maintain policies and procedures for equal opportunities for all staff, contractors and VET students;
- Disseminate policies and procedures to staff, contractors and VET students;
- Examine all policies and practices, as they affect staff, contractors, and VET students to ensure the elimination of discrimination and harassment;
- Ensure that there is no discrimination against any individual VET student or group of VET students 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 VET students;
- Establish and maintain mechanisms to deal with complaints.

### 5.1 Director Responsibilities

AAMC Training Group's Managing Director and Managers are responsible for VET student equity. The Managing Director will not condone nor engage in discriminatory/harassing behaviour.

The Managing 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 Managing Director and Managers are to ensure staff act according to this policy and all VET students are made aware of their rights and responsibilities pursuant to this policy.

The Managing Director will maintain confidentiality of all complaints. If the Managing 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 VET Student Responsibilities

AAMC Training Group staff, contractors and VET students have the responsibility to:

- Act to prevent harassment, discrimination, bullying, vilification and victimisation against others.
- Treat people fairly, respectfully, and without discrimination or harassment.
- Respect differences among staff, students and contractors, including cultural, social and personal diversity.
- Respect the privacy and confidentiality rights of others.
- Refuse to participate in behaviours that are discriminatory, harassing, intimidating, or harmful.
- Support any person experiencing inappropriate behaviour to say no, and act as a witness if the person chooses to lodge a complaint.
- Behave in a manner that does not interfere with the learning of others.

- Observe site rules, behaviour expectations, and any directions given by AAMC Training Group trainers, assessors or staff.
- Conduct themselves in a responsible manner while undertaking training or assessment.
- Respect the rights of all individuals to express their views while also listening to others and allowing them to have their say.

If an AAMC Training Group staff member, contractor, or VET student feels harassed, bullied or victimised, they are encouraged (where appropriate) to inform the person that the behaviour is unwanted and unacceptable. If they feel unable to do so, or if the behaviour continues, the matter should be reported directly to the Managing Director of AAMC Training Group.

### **5.3 Student Code of Conduct**

In addition to the shared responsibilities outlined above, all VET students must also comply with the AAMC Training Group Student Code of Conduct, which forms part of this Access and Equity Policy.

VET students are expected to:

- Act in accordance with all AAMC Training Group policies, procedures and behavioural expectations.
- Comply with all relevant Commonwealth, State and Territory legislative requirements.
- Demonstrate respectful, courteous and professional behaviour toward staff, trainers, assessors, other students, and industry partners.
- Participate actively in learning and assessment activities, attend scheduled sessions where applicable, and meet assessment deadlines.
- Avoid disrupting training, teaching, learning or assessment activities, whether delivered online, in the workplace, or in a classroom setting.
- Use AAMC Training Group learning and support resources—including IT systems—in a safe, lawful and respectful manner that does not impede the learning of others.
- Conduct themselves professionally during vocational placement or other workplace-based assessment activities.
- Comply with policies relating to assessment, academic integrity, privacy, and acceptable use of technology and AI tools.
- Ensure their behaviour does not adversely affect the reputation of AAMC Training Group.
- Follow all reasonable directions provided by AAMC Training Group staff, trainers and assessors.

Any breach of the Student Code of Conduct may result in warnings, suspension, cancellation of enrolment, or other actions consistent with the Complaints and Appeals Policy and any applicable legislation or contractual requirements.

## **6. Legislation**

This policy reflects our commitment to the following legislation:

- a) National Vocational Education and Training Regulator Act 2011 (NVR Act) – Commonwealth
- b) Education and Training Reform Act 2006 (Victoria)
- c) Vocational Education and Training Act 1996 (Western Australia)
- d) South Australian Skills Act 2008 (South Australia)

- e) Training and Workforce Development Act 2013 (Tasmania)
- f) Age Discrimination Act 2004 (Commonwealth)
- g) Disability Discrimination Act 1992 (Commonwealth)
- h) Racial Discrimination Act 1975 (Commonwealth)
- i) Sex Discrimination Act 1984 (Commonwealth)
- j) Discrimination Act 1991 (Australian Capital Territory)
- k) Disability Services Act 1991 (Australian Capital Territory)
- l) Anti-Discrimination Act 1977 (New South Wales)
- m) Anti-Discrimination Act 1992 (Northern Territory)
- n) Anti-Discrimination Act 1991 (Queensland)
- o) Equal Opportunity Act 1984 (South Australia)
- p) Anti-Discrimination Act 1998 (Tasmania)
- q) Equal Opportunity Act 2010 (Victoria)
- r) Disability Act 2006 (Victoria)
- s) Equal Opportunity Act 1984 (Western Australia)

## **7. Records Management**

All documentation regarding complaints concerning Access and Equity matters are maintained in accordance with *RTO Reporting and Records Management Policy*.

## **8. Monitoring and Improvement**

All Access and Equity practices are monitored by the Director of AAMC Training Group and areas for improvement identified and acted upon as per the *Continuous Improvement Policy*.