

### Purpose

This procedure describes the processes whereby The Coaching Institute (TCI) controls and manages student support, in particular, those students requiring additional support to complete their training program.

### Scope

The Coaching Institute has a responsibility as a Registered Training Organisation to provide students with every opportunity to complete their training program once enrolled. This is in line with obligations under Commonwealth legislation, TCI is committed to promoting a fair and equitable environment for students, clients and other stakeholders that is free from discrimination, harassment and vilification.

Access and equity policies and approaches aimed at ensuring that VET is responsive to the individual needs of 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.

TCI adheres to the Access and Equity principles include:

- Equity for all people through the fair and appropriate allocation of resources;
- Equality of opportunity for all people without discrimination;
- Access for all people to appropriate quality training and assessment services; and
- Increased opportunity for people to participate in training.

For those disadvantaged groups include the following groups who traditionally have been under-represented in Vocational Education and Training as per below, TCI will provide them the same opportunity like any other student:

- People with a disability;
- Aboriginals and Torres Strait Islanders;
- Women;
- People from non-English speaking backgrounds;
- People in rural and remote areas; and
- Long term unemployed.

TCI is committed to complying with Commonwealth and State legislation and policies regarding access, equity and cultural diversity. This legislation includes the Disability Discrimination Act (1992) and the Anti-discrimination Act (1998).

TCI also maintains compliance with the Disability Standards for Education (2005) including processes relating to:

- Enrolment;
- Participation;
- Curriculum development, accreditation and delivery;
- Student support services; and
- Elimination of harassment and victimisation.

TCI strives to maximise opportunities for access, participation and outcomes for all Students within the vocational education, training and employment system.

Any special needs a student may require to assist in completing a program are addressed in this policy.

The Standards for Registered Training Organisations (RTOs) 2015 (Standard 1, Clause 1.7) – Students receive training, assessment and support services that meet their individual needs is relevant.

This policy applies to all staff employed by or contracted to TCI who are responsible for enrolment, training and assessment and students.

**Responsible parties**

The CEO has delegated the Operations Manager as responsible for the management, control and issue of this policy.

**Student Rights and TCI Responsibilities**

Enrolment	
Students' Rights	TCI Responsibilities
<ul style="list-style-type: none"> <li>Right to seek admission and enrol on the same basis as prospective Students without learning difficulties / differences / disability including the right to reasonable adjustments.</li> </ul>	<ul style="list-style-type: none"> <li>Take reasonable steps to ensure that the enrolment process is accessible.</li> <li>Consider Students with disability in the same way as Students without learning difficulties / differences / disability when deciding to offer a place.</li> <li>Consult with the prospective Students or their associates about the effect of the disability on their ability to seek enrolment; and any reasonable adjustments necessary.</li> </ul>
Participation	
Students' Rights	TCI Responsibilities
<ul style="list-style-type: none"> <li>Right to access courses and programs; use services and facilities; and have reasonable adjustments, to ensure Students with learning difficulties / differences / disability are able to participate in education and training on the same basis as Students without disability.</li> </ul>	<ul style="list-style-type: none"> <li>Take reasonable steps to ensure participation.</li> <li>Consult with the Student or their associate about the effect of the learning difficulties / differences / disability on their ability to participate.</li> <li>Make a reasonable adjustment if necessary.</li> <li>Repeating this process over time as necessary.</li> </ul>
Curriculum Development, Accreditation and Delivery	
Students' Rights	TCI Responsibilities
<ul style="list-style-type: none"> <li>Right to participate in courses and relevant supplementary programs that are designed to develop their skills, knowledge and understanding, on the same basis as</li> </ul>	<ul style="list-style-type: none"> <li>Enable Students with disability to participate in learning experiences (including assessment and certification).</li> <li>Consult with the Student or their associate.</li> </ul>

<p>Students without learning difficulties / differences / disability and to have reasonable adjustments to ensure they are able to participate in education and training.</p>	<ul style="list-style-type: none"> <li>• Take into consideration whether the learning difficulties / differences / disability affects the Student’s ability to participate in the learning experiences.</li> </ul>
<p><b>Student Support Services</b></p>	
<p>Students’ Rights</p>	<p>TCI Responsibilities</p>
<ul style="list-style-type: none"> <li>• Right to access Student support services provided by education institutions, on the same basis as Students without learning difficulties / differences / disability. Students with learning difficulties / differences / disability have the right to specialised services needed to participate in the educational activities they are enrolled in.</li> </ul>	<ul style="list-style-type: none"> <li>• Ensure that Students with learning difficulties / differences / disability are able to use general support services.</li> <li>• Ensure that Students have access to specialised support services.</li> <li>• Facilitate the provision of specialised support services.</li> </ul>
<p><b>Harassment &amp; Victimisation</b></p>	
<p>Students’ Rights</p>	<p>TCI Responsibilities</p>
<ul style="list-style-type: none"> <li>• Right to education and training in an environment that is free from discrimination caused by harassment and victimisation on the basis of their learning difficulties / differences / disability.</li> </ul>	<ul style="list-style-type: none"> <li>• Implement strategies to prevent harassment or victimisation.</li> <li>• Take reasonable steps to ensure that personnel and Students are informed about their obligation not to harass or victimise Students with learning difficulties / differences / disability.</li> <li>• Take appropriate action if harassment or victimisation occurs.</li> <li>• Ensure complaint mechanisms are available to Students.</li> </ul>

**Procedure**

The Coaching Institute acknowledges that not all students are equal in their ability to learn and as such TCI has a responsibility to identify the differing abilities of all students and provide support and alternative learning tools where necessary.

TCI treats all participants and all individuals seeking to enrol equally and fairly. TCI has implemented open, fair and transparent procedures that are based on merit for making decisions about:

- The selection of individuals who seek to enrol; and
- The treatment of individuals undertaking courses.

TCI undertakes to identify and, where possible, remove barriers that prevent individuals from accessing and participating in its services. TCI is committed to treating all prospective and actual Students on the same basis.

### On the same basis

A person with a disability is able to seek admission to, or apply for enrolment in, an institution on the same basis as a prospective Student without a disability if the person has opportunities and choices in admission or enrolment that are comparable with those offered to other prospective Student without disabilities.

TCI ensures it treats prospective Students with a disability on the same basis as prospective Students without a disability as it makes any decisions about admission or enrolment on the basis that reasonable adjustments will be provided.

An adjustment is a measure or action (or a group of measures or actions) taken by TCI that has the effect of assisting a Student with a disability:

- In relation to an admission or enrolment — to apply for the admission or enrolment;
- In relation to a course or program — to participate in the course or program; and
- In relation to facilities or services — to use the facilities or services;

On the same basis as a Student without a disability, and includes an aid, a facility, or a service that the Student requires because of his or her disability.

The following timelines and integrated tools are used to identify any additional requirements, and it also needs to incorporate the procedure of Reasonable Adjustments as indicated towards end of this document:

### Prior to Enrolment

Prior to enrolment, Program Consultants are to initiate either face to face or telephone contact with the potential student. The method of contact should be determined by the Program Consultant. This initial discussion is to outline the program in detail; including the academic requirements and to establish if there are any additional support is required. All potential student is required to complete Pre Training review and a literacy and numeracy assessment. Refer to Form F 30 Language, Literacy and Numeracy and Pre Training review. Outcomes from these assessments may be used to develop a special needs program and/or determine the students ability to proceed. This contact should also guide the enrolling student through the Student Acceptance Form, fees and charges, recognition of prior learning and the inclusive articles within the Student Handbook.

### At Enrolment

The Student Acceptance Form includes further advice regarding the personal, emotional and physical challenges the student may encounter throughout the program and at this point, the student will decide whether to continue with the enrolment or not.

### Personal Success Planning Session

The Personal Success Planning Session (PSPS) is a telephone conversation between the student and a member of the Student Support Team conducted after enrolment but before the first formal training occurrence. The PSPS is designed to

capture further information from the student to assist TCI in identifying student's needs.

To guide the Student Support Team through the process in a systematic way, a checklist, Form F 24 Personal Success Planning Session is to be used. A copy of the completed F 24 is to be retained on the students file and any outcomes requiring further action are to be addressed in consultation with the Operations Manager.

From information provided by the student at the PSPS, Student Support is to develop a personal plan for the student. This plan is to be reflected upon during outbound calls throughout the enrolment period.

Information from the PSPS is to be uploaded to the student database.

### Outbound Calls

Outbound calls allow TCI support staff to closely monitor a student's welfare and academic progress. These calls are to be conducted by the Student Support Team at least every three months or when a milestone in training has occurred. Refer to the student database to determine the individual students call dates.

Student Support members making the calls are to utilise the appropriate Outbound Call Checklist to gather information from the student to determine if any additional assistance is required. The student's initial PSPS is to be used as a reference for Outbound Calls. All information resulting from the outbound call is to be noted in the student database.

Where it is identified that the student requires additional support as a result of the Outbound Call, actions are to be initiated in consultation with the Operations Manager and recorded on the students file.

### Mentors

Integral components of all training programs at TCI are Triads. Triads allow students to have their progress in practical aspects of their program evaluated and reviewed by a mentor. Mentors are to be selected by the Student Support Team from past students who have excelled in training in their own right and expressed an interest in supporting other students to become successful graduates.

In addition to the ongoing assistance provided to students by TCI support teams, training and assessment staff, all students are allocated a mentor for assistance and support as required.

Mentors are to provide feedback to TCI on the student's progress. Feedback is to be evaluated by Student Support and action taken as required. All feedback and actions resulting from mentor contacts is to be noted on the students file.

### Student Feedback

Students' needs are systematically assessed through student feedback. Students are required to provide feedback on completion of the various phases of training. This feedback is to be evaluated at fortnightly Continuous Improvement meetings,

recorded and actions arising listed in the Continuous Improvement Register for implementation.

Student Support is to return students calls and reply to students' emails within 24 hours of receipt. A record of the conversation or copy of the email and associated actions are to be recorded on the electronic student database. Where support to the student results in company-wide continuous improvement, the Continuous Improvement Register is to be completed and the improvement dealt with at the next Continuous Improvement meeting.

### **Reasonable Adjustment**

As a result of the process described above, TCI may provide reasonable adjustment to ensure maximum participation of students with a disability in teaching, learning and assessment activities.

An adjustment is reasonable in relation to a Student with a learning difficulties / differences or disability if it balances the interests of all parties affected. In assessing whether a particular adjustment for a Student is reasonable, TCI has regard to all the relevant circumstances and interests, including the following:

- The Student's learning differences / difficulties / disability;
- The views of the Student or the Student's associate;
- The effect of the adjustment on the Student, including the effect on the Student's:
  - Ability to achieve learning outcomes; and
  - Ability to participate in courses or programs; and
  - Independence;
- The effect of the proposed adjustment on anyone else affected, including TCI, personnel and other Students; and
- The costs and benefits of making the adjustment.

All reasonable adjustment in teaching, learning and assessment activity needs to be justifiable and must uphold the original integrity of the qualification.

To ensure the participation of all students, TCI is obliged to:

- ensure that course activities are sufficiently flexible;
- provide additional support to students where necessary; and
- where a student cannot participate, offer a reasonable substitute within the context of the overall course.

Reasonable adjustment applied to participation in teaching, learning and assessment activities may include:

- customising resources and activities within the training package or accredited course
- modifying the presentation medium
- student support
- use of assistive / adaptive technologies
- making information accessible both prior to enrolment and during the course, and
- monitoring the adjustments to ensure student needs continue to be met.

Reasonable adjustment to learning and assessment activity may incur additional student fees.

## The procedure of Reasonable Adjustments

### 1. Process for Considering Adjustments

TCI provides equitable access to all required educational and support services, so that no Student is disadvantaged regardless of their mode of study or location. Where there may be limitations regarding access to these resources, TCI provides clear advice in pre-enrolment information so all clients can make an informed choice about which RTO and course of study best meets their needs.

TCI embraces the responsibility of ensuring that all personnel acquire the knowledge and skills to relate to Students without direct or indirect discrimination.

All personnel continue to expand their knowledge or access and equity issues through induction processes when joining TCI, and in structured professional development when is needed in access and equity issues and resources.

TCI personnel have access to a range of access and equity materials designed to assist Students in undertaking and completing courses and qualifications.

In assessing whether an adjustment is requires to the course or program in which the Student is enrolled, or proposes to be enrolled, is reasonable, TCI is entitled to maintain the academic requirements of the course or program, and other requirements or components that are inherent in or essential to its nature.

### 2. Consulting the Student

Before TCI makes an adjustment for the Student, the Student or their associate is consulted about:

- Whether the adjustment is reasonable; and
- The extent to which the adjustment would achieve the aims in relation to the Student; and
- Whether there is any other reasonable adjustment that would be less disruptive and intrusive and no less beneficial for the Student.

### 3. Deciding on an adjustment to be made

In deciding whether to make a particular reasonable adjustment for a Student, TCI:

- Assesses whether there is any other reasonable adjustment that would be less disruptive and intrusive and no less beneficial for the Student; and
- Assesses whether the adjustment may need to be changed over the period of a Student's education or training.

A detailed assessment, which might include an independent expert assessment, may be required in order to determine what adjustments are necessary for a Student. The type and extent of the adjustments may vary depending on the individual requirements of the Student and other relevant circumstances. Multiple adjustments may be required and may include multiple activities.

### 4. Assessing reasonable adjustments

In assessing whether a particular adjustment is reasonable for the Student with a disability, TCI takes into account:

- The nature of the Student's learning difficulties / differences / disability;
- The information provided by, or on behalf of, the Student about how the learning difficulties / differences / disability affects the Student's ability to participate;
- Views of the Student, or an associate of the Student, about whether a proposed adjustment is reasonable and will enable the Student with a learning difficulties / differences / disability to access and participate in education and training opportunities on the same basis as Students without learning difficulties / differences / disabilities;
- Information provided by, or on behalf of, the Student about his or her preferred adjustments;
- The effect of the proposed adjustment on the Student, including the Student's ability to participate in courses or programmes and achieve learning outcomes;
- The effect of the proposed adjustment on anyone else affected, including TCI operations, personnel and other Students; and
- The costs and benefits of making the adjustment.

In making a reasonable adjustment, TCI ensures that the integrity of the course or program and assessment requirements and processes are maintained. TCI acts upon information about an adjustment in a timely way that optimises the Student's participation in education or training.

In meeting its obligations to provide reasonable adjustments, TCI may provide an alternative adjustment to the Student's preferred form of adjustment, if the alternative is effective in achieving the desired purpose.

### 5. Unjustifiable Hardship

Once a reasonable adjustment has been determined, TCI adjustment may consider if the adjustment would impose unjustifiable hardship on its operations. In determining what constitutes unjustifiable hardship, all relevant circumstances of the particular case are taken into account including:

- The nature of the benefit or detriment likely to accrue or be suffered by any persons concerned; and
- The effect of the learning difficulties / differences / disability of a person concerned; and
- The financial circumstances and the estimated amount of expenditure required to be made by the person claiming unjustifiable hardship.

In determining whether unjustifiable hardship applies, TCI:

- Takes into account information about the nature of the Student's learning difficulties / differences / disability, his or her preferred adjustment, any adjustments that have been provided previously and any recommended or alternative adjustments. This information may be provided by the Student, an associate of the Student or independent experts (or a combination of those persons);
- Ensures that timely information is available to the Student, or an associate of the Student about the processes for determining whether the proposed adjustment would cause unjustifiable hardship; and
- Ensures that these processes maintain the dignity, respect, privacy and confidentiality of the Student and the associates of the Student, consistent with the rights of the rest of the community.



Where a claim of unjustifiable hardship is made, TCI has taken into account all the financial and other resources that are reasonably available for the purpose of making any necessary adjustments for the Student, and the impact of those adjustments on its capacity to provide education of high quality to all Students while remaining financially viable.

TCI considers all costs and benefits both direct and indirect that are likely to result, the Student and any associates of the Student, and any other persons in the learning or wider community, including:

- Costs associated with additional personnel, the provision of special resources or modification of the curriculum;
- Costs resulting from the Student's participation in the learning environment, including any adverse impact on learning and social outcomes for the Student, other Students and teachers; and
- Benefits deriving from the Student's participation in the learning environment, including positive learning and social outcomes for the Student, other Students and teachers, and any financial incentives, such as subsidies or grants, available to the provider as a result of the Student's participation.

Where TCI decides to rely on unjustifiable hardship, it ensures that a notice stating the decision and the reasons for the decision is given to the Student, or an associate of the Student, as soon as practicable after the decision is made.

### 6. Implementing Reasonable Adjustments

TCI takes reasonable steps to ensure that any adjustment required to be made is made within a reasonable time. Whether the time is reasonable depends, in particular, on whether and when the Student, or his or her associate, has provided:

- In a timely way, any relevant information in the possession of the Student or associate about how the learning difficulties / differences / disability affects the Student in relation to education or training; and
- The Student's or the associate's opinion about the matters.

Where reasonable adjustments are implemented, a detailed training and assessment plan including timetables, notes regarding the required adjustments, and any related communications regarding the adjustments is maintained in the Student's file.

Reasonable Adjustments	
Type of disability	Example reasonable adjustments
Mobility impairment	Provision of wheelchair accessibility, access to aids such as for holding documents, adjustable tables, note taking support, oral rather than written presentations or exams, use of a personal computer, lifting limits.
Vision impairment	Use of audio recordings, enlarged text and images, enlarged computer screen images, use of voice synthesisers on computers, good lighting or reading lamps, Braille translations, provision for guide dogs, avoid moving furniture without informing the person, provision of additional writing time for assignments/tests.
Hearing impairment	Use of teletext, audio loops for people using hearing aids, use of Plain English documents, sign language interpreters for training and

	assessment.
Intellectual disability	Practical learning sessions, repetition of learning exercises, use of Plain English, use of mentors, assessment that is appropriate to the skill, i.e. avoiding written test for practical tasks, provision of additional time.
Psychiatric disability	Use of reflective listening skills, identification and avoidance of stresses, use of ongoing rather than formal assessments, providing 'time-out' breaks in assessment.
People with acquired brain injury	Provision of time and patience during training and assessment, using reflective listening skills, provision of memory aids, e.g. posters, notes, minimisation of stress.
Speech impairment	Provision of time and patience, paraphrasing, getting individuals to put things in writing, minimising stress.

**Support Services**

The following support services are available and accessible for all Students studying with TCI. TCI will provide Students with contact details to refer any matters that require further follow up with relevant professionals.

Referral Service Available	Contact Details
<p><b>Lifeline</b> Lifeline provides all Australians experiencing a personal crisis with access to online, phone and face-to-face crisis support and suicide prevention services. Find out how these services can help you, a friend or loved one.</p>	Phone: 13 11 14
<p><b>Kids Helpline</b> If you're between 5 and 25 and you're feeling depressed, worried, sad, angry or confused about things like your studies personal relationships, Kids Helpline offers free 24 hour, 7 day telephone counselling support (anonymous if you prefer).</p>	Phone: 1800 551 800
<p><b>Drug Info</b> DrugInfo is a service provided by the Australian Drug Foundation that offers information about alcohol and other drugs and prevention of related harms</p>	Phone: 1300 85 85 84 <a href="http://www.druginfo.adf.org.au/contact-numbers/help-and-support">www.druginfo.adf.org.au/contact-numbers/help-and-support</a>
<p><b>Reading and Writing Hotline</b> For the price of a local call anywhere in Australia, the Hotline can provide you with advice and a referral to one of 1200 providers of courses in adult literacy and numeracy.</p>	Phone: 1300 655 506 <a href="http://www.readingwritinghotline.edu.au">www.readingwritinghotline.edu.au</a>
<p><b>Centrelink</b></p>	Phone: 1800 057 111 <a href="http://www.humanservices.gov.au/customer/dhs/centrelink">www.humanservices.gov.au/customer/dhs/centrelink</a>

**Review**

This document and the procedures resulting from the implementation of this policy will be reviewed annually as determined in the Risk Review Schedule.

<b><u>Legislation Name</u></b>	<b><u>Legislation No.</u></b>	<b><u>Description</u></b>
Disability Discrimination Act 1992	Comlaw ID C2015C00252	An Act relating to discrimination on the ground of disability
Disability Standards for Education 2005		The Standards were formulated under the Disability Discrimination Act 1992 and came into effect in August 2005
Racial Discrimination Act 1975	Comlaw ID C2016C00089	An Act relating to the Elimination of Racial and other Discrimination
Sex Discrimination Act 1984	Comlaw ID C2016C00098	An Act relating to discrimination on the ground of sex, marital status, pregnancy, potential pregnancy, breastfeeding or family responsibilities or involving sexual harassment
Age Discrimination Act 2004	Comlaw ID C2015C00256	An Act relating to discrimination on the ground of age
Standards for Registered Training Organisations (RTOs) 2015	Appendix 1	Glossary – Access and equity
Standards for Registered Training Organisations (RTOs) 2015	Standard 8	The RTO cooperates with the VET Regulator and is legally compliant at all times
Standards for Registered Training Organisations (RTOs) 2015	Standard 5	Learners are aware of their rights and responsibilities
Standards for Registered Training Organisations (RTOs) 2015	Standard 4	Accurate and accessible information about an RTO, its services and performance is available to inform prospective and current learners and clients
Standards for Registered Training Organisations (RTOs) 2015	Standard 7	The RTO has effective governance and administration arrangements in place
Standards for Registered Training Organisations (RTOs) 2015	Standard 6	Complaints and appeals are recorded, acknowledged and dealt with fairly, efficiently and effectively

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CEO