

# Reasonable Adjustment Policy (Learners)

## 1. PURPOSE

To provide a framework for ensuring all learners with disability, health conditions and carer responsibilities can equitably access programs, services, facilities, resources and learning and assessment activities, including making reasonable adjustments where learner's needs are not met by inclusive practices alone.

## 2. SCOPE

Applies to all current and prospective learners at Holmesglen.

## 3. POLICY STATEMENT

Holmesglen is committed to providing an accessible and inclusive learning environment to enable people with disability, health conditions and carer responsibilities to participate fully as a member of the Holmesglen community. In delivering on this commitment, we consider and make reasonable adjustments that remove barriers to participating in education and training and contribute to achieving our diversity and inclusion goals.

## 4. PRINCIPLES

### General principles

- 4.1 Holmesglen complies with the requirements of the *Disability Discrimination Act 1992 (Cth)*, *Disability Standards for Education 2005 (Cth)*, *Disability Act 2006 (Vic)* and *Carers Recognition Act 2012 (Vic)*.
- 4.2 Holmesglen is committed to fostering a work and learning environment free from discrimination or harassment based on disability, health condition or carer responsibilities. It provides training, resources and information on relevant equity issues for employees to support this commitment and implementation of our Diversity, Equity and Inclusion Policy.
- 4.3 Holmesglen provides equitable access to learner related processes including recruitment, admission and enrolment.
- 4.4 Holmesglen provides information to prospective and current learners about the inherent requirements to successfully complete a course to assist learners to make informed choices.
- 4.5 Holmesglen ensures its digital and physical learning environments enable the safe and equitable participation of all learners.
- 4.6 Holmesglen provides adequate and appropriate resources and support services where reasonably possible and applies our Learner Support Framework to support people with disability, health conditions and carer responsibilities.
- 4.7 Holmesglen supports learners with disability, health conditions and carer responsibilities in accordance with our ASPIRE values, including demonstrating respect and integrity.

### Making study-related reasonable adjustments

- 4.8 Holmesglen promotes and implements procedures for making reasonable adjustments that enable people with disability, health conditions or carer responsibilities to participate in student life. These adjustments may apply to goods, services, facilities, events, processes, and learning and assessment activities and resources, including practical placement.

- 4.9 At all times during the process of assessing, determining and implementing study-related reasonable adjustments, Holmesglen is committed to ensuring:
- a) timely and transparent decision making
  - b) flexibility and responsiveness
  - c) impartiality, fairness and equity.
- 4.10 A collaborative approach underpins how reasonable adjustments are managed, which involves the learner and relevant teaching and non-teaching employees, including equity specialists. Managers will also engage with equity services to support and guide departmental employees in identifying and implementing reasonable adjustments, as required.
- 4.11 Learners must register with the Student Engagement and Equity department to enable Holmesglen to assess and/or determine the provision of a reasonable adjustment.
- 4.12 Learners with disability, health conditions or carer responsibilities seeking reasonable adjustments are expected to engage in consultations with equity services and provide relevant updates if their circumstances change. Holmesglen may request information from a learner's health practitioner to assist in making a reasonable adjustment decision.
- 4.13 Learners may bring a support person or advocate to consultations as required to facilitate effective communication and participation.
- 4.14 Holmesglen respects learners' rights to privacy and confidentiality when seeking information about their disability, health condition or carer responsibilities for the purpose of making adjustments. In accordance with the Privacy Policy, Holmesglen will only share this information internally to effectively implement this policy and where a learner consents to disclosure. Holmesglen may disclose this information to other parties where there is a duty of care, legislative or regulatory obligation, including notification requirements related to clinical practice in regulated health occupations.
- 4.15 When assessing and determining a request for reasonable adjustments, the Institute will consider the:
- a) views and experience of the learner
  - b) nature and impact of the disability, health condition or carer responsibility
  - c) information from consultations with the learner, their support person or advocate and health practitioners
  - d) enhanced independence to be gained by the learner
  - e) learner's ability to participate in units/subjects or the course and achieve learning outcomes or demonstrate competency
  - f) learner's usual work and learning methods
  - g) inherent requirements of the unit/subject and/or course
  - h) training and assessment strategy (VET qualification), teaching and assessment strategy (Higher Education qualification) or learning and assessment strategy (microcredential) developed to implement a course
  - i) effect of the proposed adjustment on anyone else, including other members of the Holmesglen community, practical placement hosts and third-party providers
  - j) costs and benefits of making the adjustment.
- 4.16 Learners may be accompanied by an assistance animal where the animal is accredited or is appropriately trained to assist people with disability and meets appropriate standards of hygiene and behaviour for an animal in a public place. Learners must make a request during the admission process to be accompanied by an assistance animal on campus or off-campus during learning activities (eg excursions, camps and site visits) and recreation events (eg trips

and tours). Companion animals or pets are not permitted on campus or at off-campus learning activities and recreation events.

- 4.17 Holmesglen is not required to provide an adjustment if it:
- would impose unjustifiable hardship on Holmesglen
  - compromises the inherent requirements of a course
  - places the safety, health or welfare of a learner or other person at risk.
- 4.18 Reasonable adjustments to assessment ensure continued compliance with Holmesglen's Assessment Policy (VET) and Assessment and Moderation Policy (Higher Education).
- 4.19 Reasonable adjustments are documented in an access plan.
- 4.20 Learners with disability, health conditions and carer responsibilities who are dissatisfied with decisions made about requested reasonable adjustments or their experience in engaging with Holmesglen may make a complaint in accordance with our Complaints Policy (Learners). We encourage learners to discuss their concerns with the manager of the relevant area in the first instance.

### Record keeping and reporting

- 4.21 All information collected or created in the implementation of this policy is handled in accordance with the Information Security Policy, Privacy Policy and Records Management Policy.
- 4.22 All records related to provision of equity services and adjustment decisions are held centrally and are monitored and reviewed to ensure effective implementation of this policy.
- 4.23 Copies of access plans and sensitive personal information provided to teaching areas to support learners during their studies are kept confidential, stored in accordance with their information security classification and disposed of in accordance with Holmesglen's records management procedures.

## 5. ACCOUNTABILITIES

Action	Accountability
Oversee the implementation of this policy. Ensure relevant employees receive training and support to implement this policy. Ensure learners are notified of Holmesglen's reasonable adjustment policies and the processes we will follow where adjustments are requested.	Executive Director Engagement and Support
Review recommendations that a reasonable adjustment request would impose unjustifiable hardship to Holmesglen and make a final determination.	Executive Director
Ensure inherent requirements to successfully complete courses are documented and provided to prospective and current learners on the Holmesglen website.	Dean/Associate Director
Manage the provision of engagement, advisory and equity services. Support managers, teaching and non-teaching employees as requested in assessing, determining and implementing reasonable adjustments. Ensure the secure storage of all records relating to reasonable adjustments and retain and dispose of these in accordance with records management requirements.	Manager Student Engagement and Equity
Consult with learners, their support person or advocate and other relevant employees to recommend reasonable adjustments.	Disability Liaison Officer

Action	Accountability
<p>Request information from a learner's health practitioner where relevant and appropriate and consider this in recommending adjustments.</p> <p>Document reasonable adjustments in an access plan.</p> <p>Provide written decisions on reasonable adjustment requests to the learner.</p>	
<p>Advise learners of support, wellbeing and equity services available.</p> <p>Meet with learners and consider a direct request for reasonable adjustments or refer the learner to Student Engagement and Equity for further consultation.</p> <p>Seek support and guidance as required from relevant student support, wellbeing and equity services to manage adjustment requests and support departmental employees.</p> <p>Assess if the requested reasonable adjustment is reasonable in accordance with this policy and in consultation with Student Engagement and Equity.</p> <p>Refer declined requests based on unreasonable hardship to an Executive Director for final determination.</p>	Managers
<p>Participate in training and information sessions on equity issues.</p> <p>Participate in consultation sessions as requested to determine reasonable adjustments and implement adjustments documented in learner access plans.</p>	All employees

## 6. DEFINITIONS

Term	Meaning
Access plan	A formal document developed by a disability practitioner in consultation with a learner designed to ensure that the learner has equitable access to educational opportunities. This plan is tailored to the individual needs of the learner, detailing specific adjustments necessary to support their participation in learning.
Assistance animal	<p>Under the <i>Disability Discrimination Act 1992</i> (Cth), a dog or other animal that is either:</p> <ul style="list-style-type: none"> <li>• accredited under a law of a state or territory that provides for the accreditation of animals trained to assist a person with disability</li> <li>▪ accredited by a relevant animal training organisation</li> <li>▪ trained to assist a person with disability and that meets appropriate standards of hygiene and behaviour for an animal in a public place</li> </ul> <p>Evidence of accreditation may include an accredited assistance ID attached to the animal, a letter from an accredited assistance animal training organisation attesting to the animal's training or an Assistance Animal Pass issued by Public Transport Victoria.</p>
Carer	A learner who is the carer of an older person, or a person with disability or ongoing health condition. Learners who provide care as part of their training or as a volunteer for an organisation are not considered a carer for the purposes of this policy.
Disability	Holmesglen takes a broad approach to the definition of disability as established by the <i>Disability Discrimination Act 1992</i> (Cth). The term includes:

Term	Meaning
	<ul style="list-style-type: none"> <li>▪ total or partial loss of a person’s bodily or mental functions</li> <li>▪ total or partial loss of a part of the body</li> <li>▪ the presence in the body of organisms causing disease or illness</li> <li>▪ the presence in the body of organisms capable of causing disease or illness</li> <li>▪ the malfunction, malformation or disfigurement of a part of the person’s body</li> <li>▪ a disorder or malfunction that results in the person learning differently from a person without the disorder or malfunction</li> <li>▪ a disorder, illness or disease that affects a person’s thought processes, perception of reality, emotions or judgment or that results in disturbed behaviour</li> </ul> <p>and includes a disability that:</p> <ul style="list-style-type: none"> <li>▪ presently exists</li> <li>▪ previously existed but no longer exists</li> <li>▪ may exist in the future (including because of a genetic predisposition to that disability)</li> <li>▪ is imputed to a person.</li> </ul> <p>To avoid doubt, a disability that is otherwise covered by this definition includes behaviour that is a symptom or manifestation of the disability.</p>
Equity services	Services and support provided by specialist staff within the Student Engagement and Equity department at Holmesglen, including Disability Liaison Officers.
Health condition	The diseases, conditions or injuries that interfere with a person's usual activities or feeling of wellbeing.
Inherent requirements	The capabilities, knowledge and skills that are essential to achieve the learning outcomes of a course, demonstrate competency or to satisfy course or curriculum requirements, while preserving the academic integrity of Holmesglen’s learning, assessment and accreditation processes.
Reasonable adjustment	<p>Under the Commonwealth Disability Discrimination Act (1992) and the Disability Standards for Education, 2005 (website), RTOs are required to customise their services, including making reasonable adjustment to learning and assessment strategies to facilitate the successful participation of people with disability in education, training, and employment. The goal is to ensure that all learners have the best opportunity to learn and to demonstrate that they have achieved subject/unit requirements.</p> <p>Reasonable Adjustments follow negotiation between the faculty or department and learner, with support from Student Engagement and Equity and Student Wellbeing employees. These include measures or actions taken to help a learner with disability, health condition or carer responsibilities to participate in a course on the same basis as other learners that do not fundamentally change inherent requirements.</p> <p>Reasonable adjustments can include, but are not limited to:</p> <ul style="list-style-type: none"> <li>▪ course planning and design</li> <li>▪ business processes and decision making, including admission and enrolment</li> <li>▪ timetables and schedules</li> </ul>

Term	Meaning
	<ul style="list-style-type: none"> <li>▪ information access</li> <li>▪ learning and assessment</li> <li>▪ goods, including learning and assessment materials and resources</li> <li>▪ practical placement and work-integrated learning opportunities</li> <li>▪ facilities, equipment, and infrastructure</li> <li>▪ services</li> <li>▪ extra-curricular events and activities designed to promote inclusion and engagement in student life.</li> </ul> <p>Reasonable Adjustments will be made where they balance the interests of all parties affected.</p>
Unjustifiable hardship	<p>In determining what constitutes unjustifiable hardship, all relevant circumstances of the learner are considered including:</p> <ul style="list-style-type: none"> <li>▪ the nature of the benefit or detriment likely to accrue or be suffered by any persons concerned</li> <li>▪ the effect of the disability of a person concerned</li> <li>▪ the financial circumstances and the estimated amount of expenditure required to be made by the person claiming unjustifiable hardship</li> <li>▪ in the case of the provision of services, or the making available of facilities — an action plan given to the Commission under section 64 of the <i>Disability Discrimination Act 1992 (Cth)</i>.</li> </ul> <p>The application of unjustifiable hardship should take account of the scope and objects of the <i>Disability Discrimination Act 1992 (Cth)</i> and the <i>Disability Standards for Education 2005 (Cth)</i>, particularly the object of removing discrimination as far as possible, and of the rights and interests of all relevant parties.</p>

## 7. CONTEXT AND/OR REFERENCED DOCUMENTS

### Internal

Assessment Policy (VET)  
Assessment and Moderation Policy (Higher Education)  
Diversity, Equity and Inclusion Policy  
Information Security Policy  
Learner Support Framework  
Privacy Policy  
Records Management Policy  
Record Retention and Disposal Schedule  
Support and Wellbeing Policy (Learners)

### External

Disability Discrimination Act 1992 (Cth)  
Disability Standards for Education 2005 (Cth)  
Disability Act 2006 (Vic)  
Carers Recognition Act 2012 (Vic).  
Child Wellbeing and Safety Act 2005 (Vic)  
Education Services for Overseas Students Act 2000

Equal Opportunity Act 2010 (Vic)  
 Health Records Act 2001 (Vic)  
 Higher Education Standards Framework (Threshold Standards) 2021  
 Occupational Health and Safety Act 2004 (Vic)  
 Public Records Act 1973 (Vic)  
 Privacy and Data Protection Act 2014 (Vic)  
 National Code of Practice for Providers of Education and Training to Overseas Students 2018  
 Standards for Registered Training Organisations 2015  
 Guidelines for Non-school Providers: Minimum Standards for Registration to Provide an Accredited Senior Secondary or Foundation Secondary Course 2022

**8. REVIEW**

- 8.1 This policy must be reviewed no later than three years from the date of approval.
- 8.2 The policy will remain in force until such time as it has been reviewed and re-approved or rescinded. The policy may be withdrawn or amended as part of continuous improvement prior to the scheduled review date.

**9. VERSION HISTORY**

Version Number	Date	Summary of changes
1	June 2025	New policy.