



# Reasonable Adjustment Policy

ComSafe Training Services  
**Community Safety and Research**

Version 1.0 – 3 June 2021

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## 1 Purpose

The purpose of this policy is to ensure students with a disability are provided with the same learning opportunities and the same opportunity to perform and complete assessments as those without a disability, while maintaining the quality of the Training Program through the use of a Reasonable Adjustment.

## 2 Scope and application

This policy applies to all students entering into an accredited training program with ComSafe Training Services (RTO 91235). This does not apply to non-accredited training.

## 3 Legal and policy framework

### 3.1 Legal framework

- National Vocational Education and Training Regulator Act 2011 (Cth)
- Standards for RTOs 2015
- Commonwealth Disability Discrimination Act 1992
- Commonwealth Disability Standards for Education 2005
- Privacy Act 1988
- NSW State Records Act

### 3.2 Policy framework

The Disability Discrimination Act (1992) requires educational institutions to put in place actions to help ensure equal opportunity for people with a disability. Under the Disability Standards for Education 2005, education providers must make reasonable adjustments for people with a disability, to the maximum extent that those adjustments do not cause that education provider unjustifiable hardship. The rights of students and requirements of the RTO are summarised as:

Rights	Requirements
<b>Enrolment</b>	
Right to seek admission and enrol on the same basis as prospective learners without disability including the right to reasonable adjustments.	Take reasonable steps to ensure that the enrolment process is accessible. Consider learners with disability in the same way as learners without disability when deciding to offer a place. Consult with the prospective learners or their associates about the effect of the disability on their ability to seek enrolment; and any reasonable adjustments necessary.

<b>Rights</b>	<b>Requirements</b>
<b>Participation</b>	
Right to access courses and programs; use services and facilities; and have reasonable adjustments, to ensure learners with disability are able to participate in education and training on the same basis as learners without disability.	Take reasonable steps to ensure participation. Consult with the learner or their associate about the effect of the disability on their ability to participate. Make a reasonable adjustment if necessary. Repeating this process over time as necessary.
<b>Training development, accreditation and delivery</b>	
Right to participate in courses and relevant supplementary programs that are designed to develop their skills, knowledge and understanding, on the same basis as students without disability and to have reasonable adjustments to ensure they are able to participate in education and training.	Enable students with disability to participate in learning experiences (including assessment and certification). Consult with the student or their associate. Take into consideration whether the disability affects the student's ability to participate in the training experiences.
<b>Student support services</b>	
Right to access student support services provided by education institutions, on the same basis as learners without disability. Students with a disability also have the right to specialised services needed for them to participate in the educational activities for which they are enrolled.	Ensure that students with disability are able to use general support services. Ensure that students have access to specialised support services. Facilitate the provision of specialised support services.
<b>Harassment and victimisation</b>	
Right to education and training in an environment that is free from discrimination caused by harassment and victimisation on the basis of their disability.	Implement strategies to prevent harassment or victimisation. Take reasonable steps to ensure that staff and students are informed about their obligation not to harass or victimise students with disability. Take appropriate action if harassment or victimisation occurs. Ensure complaint mechanisms are available to students.

## **4 Policy principles**

ComSafe Training Services enables reasonable adjustments to be made to training and assessment procedures for people with special needs, such as people with disabilities or with language or literacy difficulties, while ensuring training and assessment are consistent with quality outcomes and the requirements of accredited training products. Any reasonable adjustments are made without causing unjustifiable hardship.

## 5 Policy implementation

An adjustment is reasonable in relation to a student with a disability if it balances the interests of all parties affected. In assessing whether a particular adjustment for a student is reasonable, ComSafe Training Services reviews the relevant circumstances and interests, including the following:

- The student's disability
- The views of the student or the student's representative
- The impact of the adjustment on the student, including the effect on the student's:
  - Ability to achieve the training outcomes; and
  - Ability to participate in the training program; and
  - Independence.
- The effect of the proposed adjustment on any other affected parties, including ComSafe Training Services personnel and other students
- The cost and benefits of making the adjustment.

The purpose of reasonable adjustment is to make it possible for students to participate fully. It is not to give students with a disability an advantage over others, to change program standards or outcomes, or to guarantee success. A reasonable adjustment in a training and assessment activity needs to be justifiable and uphold the integrity of the training product.

## 6 Monitoring and review

This procedure is subject to systematic review, evaluation and improvement, including annual review and ongoing feedback from stakeholders.

## 7 Privacy

We respect your rights to privacy under the Privacy Act 1988 and we comply with all the Privacy Act's requirements in respect of the collection and management of your personal information. A copy of the Privacy Act can be obtained on "ComLaw" and further information on FRNSW Privacy Policy can be obtained on <http://www.fire.nsw.gov.au/page.php?id=465>. In relation to the Unique Student Identifier (USI) ComSafe is bound by the Australian Privacy Principles (APPs) in the Privacy Act 1988. ComSafe collects personal information that is reasonably necessary for, or directly related to, its functions and activities pursuant to the Student Identifiers Bill 2014.

ComSafe adheres to the NSW State Records Act 1998 and as a Registered Training Organisation (RTO) registered by ASQA, we are required to securely retain our accredited training documentation. We do not sell our client details to other organisations. The information collected on the enrolment form is for the purposes of processing your registration, participant identification, creating and maintaining participant records, reporting demographics to ASQA and assisting us in improving our service to our clients.

## 8 Document information

### 8.1 Related documents

ComSafe Training Services Language, Literacy and Numeracy Policy  
ComSafe Training Services Reasonable Adjustment Procedure

### 8.2 Document control

<b>Policy Manager</b>	Manager, ComSafe Daniel Butler
<b>Contact Officer</b>	RTO Compliance Officer Melissa Chapman
<b>Contact No</b>	1800 787 878
<b>Document type</b>	Policy
<b>Applies to</b>	<input checked="" type="checkbox"/> Firefighters <input checked="" type="checkbox"/> Administrative and Trades Staff <input checked="" type="checkbox"/> Contractors and Consultants
<b>Status</b>	Approved
<b>Security</b>	For Official Use Only
<b>Review Date</b>	31 January 2022
<b>Rescinds</b>	N/A
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### 8.3 Revision history

Version	Date	Status	CM9 Ref	Details
1.0	3/06/2021	Final	D2021/044842	Published