Access and Equity Policy

1. Purpose and Legislative Background

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 clients, allowing everyone to freely participate in the learning environment free from discrimination, harassment, bullying and vilification.

All students will be recruited ethically and responsibly and consistent with the requirements of the Standards for Registered Training Organisations (RTOs) 2025 and the National code 2018. Our Access and Equity Policy ensures that student selection decisions comply with equal opportunity legislation. Admissions staff will assess the extent to which the applicant is likely to achieve the stated competency standards and outcomes of the course, based on their qualifications and experience. Winslow College will ensure that the learning environment promotes and supports diversity of VET students, and it fosters a culturally safe learning environment for First Nations people.

Winslow College promotes, encourages and values equity and diversity in our dealings with students. It cultivates a safe and inclusive learning environment for all students. Winslow College will ensure services offered are provided in a fair and equitable manner to all students, free from bias.

Winslow College is committed to providing flexible learning and assessment options where possible, allowing clients alternatives which recognize the diversity of their individual needs and circumstances aiding them in their learning goals.

Winslow College will ensure:

a) all training and assessment policies and procedures incorporate access and equity principles.
b) all 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 always conducted in an ethical and responsible manner, ensuring fairness and compliance with Equal Opportunity legislation, and
d) all learners/clients have equitable access to training resources, facilities, equipment, support services, information, training and assessment personnel, materials, assessment opportunities, training opportunities.

2. Definitions

2.1 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 persons is treated less fairly than others based on stereotyped beliefs or views.

b) **Indirect Discrimination:** Indirect discrimination includes rules, practices, or polices 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.

2.2 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.

Harassment will not be tolerated at Winslow College. If harassment occurs, the person responsible will be subject to disciplinary procedures. Disciplinary action will be taken against any staff or client involved in such behaviour. This may include termination of employment and removal of the client from the training course. Serious cases of harassment may constitute a criminal offence.

2.3 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.

2.4 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

i) Offensive obscene language

j) Obscene telephone calls, unsolicited letters, faxes, and emails

2.5 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

2.6 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

3. Policy Principles

Winslow College will not accept any form of discrimination and we will apply the following principles in support of access and equity:

3.1 Access and Equity Principles

a) Winslow College abides by access and equity principles.

b) Winslow College 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.

c) At enrolment, clients will be asked to identify personal needs or circumstances that may exist and for which they may require additional support (See Enrolment Policy).

d) This policy 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.

e) Winslow College seeks to create a learning environment where all students are respected and can develop their full potential.

f) All clients are given fair and reasonable opportunity to attend and complete training.

g) 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.

h) 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.

i) All perceived deficiencies in the Access and Equity Policy are to be documented, assessed, and reviewed by the CEO Winslow College.

j) Winslow College will demonstrate its commitment by:

- Selecting students according to a fair and non-discriminatory process

- Making its training relevant for a diverse student population
- Providing suitable access to facilities and resources
- Providing appropriate support services
- Providing appropriate complaints procedures
- Consulting with relevant industry groups
- Raising staff, contractor, and student awareness of equity issues.

3.2 Special Needs/Considerations

a) Clients intending to enrol for training with Winslow College are requested prior to enrolment to advise Winslow College if they have any disability, physical or other impairment which may adversely affect their ability to successfully undertake training and assessment.

b) Clients are encouraged to discuss with Winslow College 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. Winslow College will ensure that reasonable adjustments are made for VET students with disability to support their participation; and where the training product includes requirements that cannot be accommodated with reasonable adjustments, providers should clearly communicate this to the prospective student and suggest alternative training options or pathways prior to enrolment.

c) Providers are required to demonstrate that they create an accessible learning environment for a student with disability, including making reasonable adjustments to support their participation in VET. Where the training product includes requirements that cannot be accommodated with reasonable adjustments, providers should clearly communicate this to the prospective student and suggest alternative training options or pathways prior to enrolment.

d) Winslow College, 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.

e) 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.

3.3 Harassment

a) Winslow College will not tolerate behaviour which is sexual harassment and expects all staff, contractors, and clients to treat each other with dignity and respect.

3.4 Bullying and Violence

a) Winslow College will not tolerate bullying or violent behaviour and expects all staff, contractors, and clients to treat each other with dignity and respect.

b) Winslow College recognises bullying and violence demeans and infringes the rights of individuals and groups, damaging the work and learning environment.

3.5 Vilification

a) Winslow College will not tolerate behaviour which vilifies another person and expects all staff, contractors, and clients to treat each other with dignity and respect.

3.6 Complaints

a) Winslow College 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. A reasonable timeframe for responding to and resolving complaints will be provided when a complaint is received. Please refer Complaints and Appeals Policy for more details.

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. If complaints are not resolved, Winslow College will provide information on the next steps to take.

d) All staff, clients and contractors involved with the Winslow College 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) Winslow College acknowledges that it is of paramount importance and in the best interests of all parties that confidentiality is maintained during these procedures.

f) Winslow College encourages the reporting of behaviour that breaches equal opportunity policy but will not tolerate vexatious or frivolous complaints.

3.7 Victimisation

a) For complaints to be brought forward, complainants must feel secure in the knowledge that the Winslow College procedures will be followed without fear of reprisal.

b) Winslow College will not victimise or treat any person unfairly for making a harassment complaint.

c) Winslow College will not tolerate behaviour of victimisation of another person and expects all staff, contractors, and clients 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.

4. Winslow College Responsibilities

Winslow College 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.

Winslow College will:

a) Maintain policies and procedures for equal opportunities for all staff, contractors, and clients.

b) Disseminate policies and procedures to staff, contractors, and clients.

c) Examine all policies and practices, as they affect staff, contractors, and clients to ensure the elimination of discrimination and harassment.

d) Ensure that there is no discrimination against any individual client or group of clients or staff, in access to facilities, products and services.

e) Educate staff and contractors on the general goals and philosophy of equal opportunity together with the rationale for policies and practices which are adopted.

f) 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.

g) Establish and maintain mechanisms to deal with complaints.

h) Provide information about how to provide feedback and make complaints through the complaints management system which is publicly available and easily accessible by VET students

i) Documents outcome of complaints and communicate to all parties

j) Use feedback and complaints to inform continuous improvement.

4.1 CEO's Responsibilities

Winslow College CEO and Managers are responsible for client equity.

The CEO 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 CEO(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 CEO will maintain the confidentiality of all complaints. If the CEO 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.

4.2 Staff, Contractors and Clients Responsibilities

Winslow College staff, contractors and clients have the responsibility to:

a) Act to prevent harassment, discrimination, and victimization against others.

b) Respect differences among other staff, clients, and contractors, such as cultural and social diversity.

c) Treat people fairly, without discrimination, harassment, or victimization.

d) Respect the rights of others.

e) Respect people's rights to privacy and confidentiality.

f) Refuse to join in with these behaviours.

g) Supporting the person in saying no to these behaviours.

h) Acting as a witness it the person being harassed decides to lodge a complaint.

i) Observe site rules or behaviour guidelines set by Winslow College Trainers/Assessors.

j) Behave in a manner that does not interfere with the learning of others; and

k) Conduct themselves in a responsible manner while in training.

l) 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 a Winslow College 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 CEO Winslow College should be contacted.

5. Related Legislation and Regulations

This policy reflects our commitment to the following legislation:

a) Age Discrimination Act 2004 (Commonwealth)
b) Disability Discrimination Act 1992 – Amened (Commonwealth)
c) Racial Discrimination Act 1975 (Commonwealth)
d) Sex Discrimination Act 1984 (Commonwealth)
e) Equal Opportunity Act 2010 (Victoria)
f) Disability Act 2006 (Victoria)
g) Equal Opportunity Act 1984 (Western Australia)
h) Disability Standards for Education 2005 (Commonwealth)
i) Standards for Registered Training Organisations (RTOs) 2025

6. Records Management

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

7. Monitoring and Improvement

All Access and Equity practices are monitored by the CEO Winslow College and areas for improvement identified and acted upon. (See Continuous Improvement Policy)

8. Management Action and Responsibility

The policy must be approved by the CEO before it takes effect.