

Student Reasonable Adjustments Policy and Procedure

Approving body	Governing Board
Date approved	27 Feb 2025
Date of effect	Commencement of operation
Next scheduled review	Two years from policy commencement
Policy owner	Chief Executive Officer
Policy contact	Chief Executive Officer
Related Documents	Admissions Policy and Procedure Student Equity and Diversity Policy and Procedure Student Support Framework Student Wellbeing Policy and Procedure Quality Assurance Framework Risk Management Framework Staff Code of Conduct Student Code of Conduct
Higher Education Standards Framework (HESF) 2021 (Cth)	Standard 1.1.1 Standard 1.3 Standard 2.2.1–3 Standard 2.3.3 Standard 3.3.3–4 Standard 7.2.1–2

Purpose

1. This Policy outlines Zenith Innovation Institute's (**Zenith** / the **Institute**) framework for supporting accessibility of resources at the Institute and the participation of all students, including students that study off-campus and those with special needs/ disabilities. This Policy complements and aligns with the Student Equity and Diversity Policy and Procedure and the Student Support Framework.

Scope

2. This Policy applies to:
 - (a) all prospective and currently enrolled students of the Institute;
 - (b) all staff of the Institute whether full-time, part-time, casual or contract;

- (c) members of the Institute's governing bodies; and
- (d) individuals engaged in providing services to the Institute or receiving services from the Institute, such as students, contractors or consultants.

Policy

Statement

3. The Institute will comply with the requirements of Commonwealth legislation and regulations including the *Disability Discrimination Act (1992)*¹ and *Disability Standards for Education 2005*.² The Institute will also comply with state and local legislation and regulations pertaining to disability and reasonable adjustments.
4. At Zenith, reasonable adjustments should focus on how a person's injury, illness or disability affects their ability to undertake their study and what adjustments can be made to overcome this. Reasonable adjustments are to be personalised to meet individual needs and circumstances on a case-by-case basis.
5. Reasonable adjustments are to be reviewed regularly to ensure they remain relevant and effective for the student and manageable within the place of learning.
6. The Institute will as much as possible give students with disabilities or special needs opportunities on the same basis as students without disabilities, including comparable access, services and facilities, and the right to participate in education unimpeded by discrimination.
7. The Institute adopts a zero-tolerance approach to discrimination on the basis of disability, including the discrimination, harassment or victimisation of a student's associate, such as a relative or carer. This approach is consistent with the *Staff Code of Conduct*, *Student Code of Conduct* and related legislation.
8. The Institute will make reasonable adjustments for students that require them to assist in application for admission, participation in the Institute's courses, and use of facilities or services.

Principles

9. This Policy is based on the following principles, that the Institute will seek to:
 - (a) **Prevent** - discrimination across all areas of the Institute's operations, including those of its related entities;
 - (b) **Remove** - unexpected barriers, costs and technology requirements for students in accessing learning resources and seeking reasonable adjustments;
 - (c) **Rights** - ensure that management is aware of its responsibilities with regard to the rights of people with disabilities;
 - (d) **Awareness** - ensure staff members and students are aware of the Institute's expectations that they will not discriminate, harass or victimise any person, including students with disabilities;
 - (e) **Reporting** - encourage students and staff to report instances of discrimination, harassment, or victimisation;

¹ *Disability Discrimination Act 1992*, <https://www.legislation.gov.au/Details/C2022C00087> accessed 3 October 2022

² *Disability Standards for Education 2005*, <https://www.legislation.gov.au/Details/F2005L00767> accessed 3 October 2022

- (f) **Participation** - as much as possible enable students with a disability to apply for, and participate in, the course on the same basis as other students; and
- (g) **Support** - to encourage prospective students and commencing students to disclose their particular needs arising from a disability to the Institute in order that they may be provided with adequate support.

Procedure

10. The Institute will provide reasonable adjustments as required by Commonwealth and state legislation and regulations so that all students can participate at the Institute on the same basis as prospective or current students without disabilities. This includes:
 - (a) seeking admission to or applying for enrolment in an institution and choices of admission and enrolment;
 - (b) treatment regarding decisions about admission or enrolment;
 - (c) participation in programs or courses, including assessments, provided by the Institute; and
 - (d) accessing student amenity and facilities such as the library and computers.
11. Reasonable adjustments as defined within this Policy can include:
 - (a) **physical adjustments**: modifying study spaces to make them accessible, providing additional equipment or tools;
 - (b) **study arrangements**: adjusting study hours or duties to help manage study loads, starting and finishing later, working from home or remotely, facilitating the assistance of carers, sign language interpreters, or guide dogs in Institute or Work Integrated Learning spaces;
 - (c) **adjustments to assessment**: modifying methods, providing additional training, assessment design or study patterns;
 - (d) **technological assistance**: providing new tools or modifying existing ones, such as speech recognition software, teletypewriters, or magnification devices; and
 - (e) **influencing the attitudes of colleagues**: providing information on how reasonable adjustments can support everyone to build a healthy, safe and productive environment.
12. Students may apply for reasonable adjustments through communicating with the Student Services Manager or representative.
13. When a student discloses a particular need, the Student Services Manager or representative will:
 - (a) consult further as required with the student, the student's Course Coordinator, or Academic Dean, especially if the adjustment may involve a student's assessments;
 - (b) consider whether an adjustment is necessary, considering information provided in the *Reasonable Adjustment Supporting Documentation Form*;
 - (c) if an adjustment is necessary, identify a reasonable adjustment;
 - (d) arrange for the reasonable adjustment to be implemented; and
 - (e) develop an ongoing *Reasonable Adjustments Plan* for the student to be maintained and reviewed each year to assist in identifying and meeting student needs and providing approved reasonable adjustments throughout the student's course of study.
14. In reviewing the request, the Student Services Manager or representative will consider whether the adjustment is unreasonable, would cause unjustifiable hardship on the Institute, or impact on the integrity of the course. In such cases the Institute is not required to implement the adjustment, as expressed in section 10.2 of the *Disability Standards for Education 2005*. The Institute will

provide an explanation to the applicant for the Institute's determination and may provide an alternative adjustment to the student's preferred form of adjustment if it is judged that the alternative is effective in achieving the desired purpose.

15. When considering an adjustment, the Student Services Manager may need to obtain information about the student's disability or individual requirements and may seek a detailed assessment by an independent expert of the nature of the disability or student's circumstances and the adjustment that is appropriate for the student. This is to be done at no cost to the student.
16. The decision of the Student Services Manager on the case will be reviewed by the Academic Dean.
17. Information about a student's disability or individual requirements will be kept confidential, and in accordance with the Institute's *Personal Information and Privacy Policy and Procedure*, except where disclosure is required for the purposes of the adjustment or in accordance with a lawful requirement.

Monitoring and improvement

18. The Institute collects data on the participation, progress, and completion of identified student groups, including students with a disability. Student feedback is sought on their experience of diversity and equity at the Institute, including access to support services.
19. The Institute uses the collected data to monitor trends in admission, participation, retention, and completion rates.
20. The Institute will improve its disability support strategies based on the collected data in relation to the access and effectiveness of support services.
21. The Institute will benchmark its performance against relevant sector data and will establish targets as appropriate.
22. The Institute will review all third-party arrangements for assurance that services are provided in compliance with the *Disability Standards for Education 2005* and this Policy.
23. The Governing Board receives an annual report on the adequacy and effectiveness of its strategies considering the particular mix of student subgroups and will make adjustments to its strategies as required.

Grievances and appeals

24. A student who wishes to lodge a formal complaint about any aspect of the implementation of this Policy may do so under the provisions of the *Student Grievance Policy and Procedure*. This includes complaints of discrimination and victimisation against any individual associated with the Institute as outlined in the *Student Equity and Diversity Policy and Procedure*.
25. If a student is dissatisfied with the outcome of any grievance lodged, or about a decision made under this Policy, they may appeal under the provisions of the *Student Appeals Policy and Procedure*.

Responsibilities

26. All students are responsible for:
 - (a) being proactive and cooperative when seeking reasonable adjustments where required;
 - (b) ensuring their behaviour and conduct reflects the standards of the Institute's Student Code of Conduct;
 - (c) not taking unfavourable action against a person that has reported an alleged discrimination; and
 - (d) reporting instances of discrimination or victimisation to the Academic Dean promptly.

27. All staff are responsible for:

- (a) offering to assist students with observable disabilities if resources or circumstances interfere with the student's access to learning resources or creates barriers to learning outcomes
- (b) complying with anti-discrimination and equal opportunity laws at all times in the course of their duties, including not to harass or victimise students with disabilities;
- (c) ensuring that their behaviour and conduct always reflect the standards of the Institute's *Staff Code of Conduct*;
- (d) reporting instances of discrimination or victimisation to the Academic Dean promptly;
- (e) informing students about the reporting and complaints processes in an instance of harassment or victimisation; and
- (f) not taking unfavourable action against a person that has reported an alleged discrimination.

28. The Academic Dean is responsible for:

- (a) implementing the strategies outlined in Appendix 1 of this Procedure to prevent discrimination, harassment and victimisation; and
- (b) reporting on the implementation of all strategies for disability support to the Academic Board and Governing Board on an annual basis.

29. The Student Services Manager is responsible for:

- (a) implementing the strategies for admission in Appendix 1 of this Procedure;
- (b) reporting to the Academic Dean on the implementation of strategies, including any observable trends, at the end of each teaching session; and
- (c) maintaining confidential records relating to students' personal information regarding reasonable adjustments or disability.

30. Course Coordinators are responsible for:

- (a) implementing the strategies for participation and course design as indicated in Appendix 1;
- (b) implementing the procedure for reasonable adjustments; and
- (c) reporting to the Academic Dean on the implementation of strategies, including on any non-compliance, complaints or dispute, at the end of each teaching session.

Definitions

31. For the purposes of this Policy:

Term	Definition
Disability	Any physical, sensory, neurological, intellectual, psychiatric or learning disability, including: physical disfigurement, the presence in the body of disease-causing organisms and total or partial loss or absence of part of the body or a bodily function. It also includes a temporary, permanent, current, past or future disability, and chronic health conditions which may not commonly be considered disabilities.
Discrimination	Proposing to treat or actually treating a person less favourably than, in circumstances that are the same or are not materially different, the

Term	Definition
	discriminator treats or would treat another person because of a personal characteristic protected by the law, in this case a disability.
Equity	Fairness and impartiality.
Harassment	Action that is reasonably likely to humiliate, offend, intimidate, or distress.
Reasonable adjustment	Measures or actions taken to assist a person to participate on the same basis as others and achieves this purpose while taking into account the person's needs and balancing the interests of all parties affected, including people with disability, the Institute, its staff, and students.
Unjustifiable hardship	A situation where making an adjustment would be unreasonable, based on an assessment of what is fair and reasonable in the circumstances. The Institute will exhaustively seek out viable alternatives to ensure reasonable adjustments if an initial request cannot be provided.
Victimisation	Subjecting or threatening to subject someone to a detriment because they have asserted their rights under equal opportunity law, made a complaint, helped someone else make a complaint, or refused to do something because it would be discrimination, harassment, or victimisation.

Version History

Version	Changes	Approval Body	Approval Date
1.0	New Policy	Governing Board (GB)	
1.1	Point 11 c, updated "modifying duties, methods, providing additional training, modifying assessment or study patterns" to "modifying duties, methods, providing additional training, assessment design or study patterns"	Governing Board (GB)	23 May 2024
1.2	Under related documents added "Student support framework; student wellbeing policy" Replaced "Risk Management Plan" with "Risk Management Framework" Point 1 added "special needs / disabilities." and "and the Student Support Framework" Point 15 added "This is to be done at no cost to the student"	GB	27 Feb 2025

Appendix 1 – Strategies

The Institute endeavours to provide a discrimination-free environment for all students throughout their experience with the Institute. Key strategies for the creation and maintenance of equal opportunities for students with disabilities are outlined below.

1. Preventing discrimination, harassment and victimisation of students with a disability

- (a) **Culture:** The Institute ensures a culture of respect of equity and diversity, including of people with disabilities, through a process of awareness training, benchmarking, and monitoring;
- (b) **Leadership:** Senior staff will demonstrate a high level of commitment to equity and diversity, including for people with disabilities, in the Institute;
- (c) **Staff awareness:** All staff of the Institute will have a general awareness of the obligations of the Institute with regard to the *Disability Standards for Education 2005*. Staff induction includes a component on disability awareness and the Institute's relevant reporting and complaints mechanisms;
- (d) **Student awareness:** Students receive regular communications, including an awareness session at orientation on equity and diversity and their rights and responsibilities in maintaining an environment free from discrimination, harassment and victimisation; and
- (e) **Third-party compliance:** Where services are provided on behalf of the Institute by third parties, the Institute will take all reasonable precautions to ensure that services are delivered in compliance with the *Disability Standards for Education 2005* and will respond promptly and effectively to any report of non-compliance.

2. Admission

- (a) **Admission information:** The Institute provides information about the admission process that is fit for purpose and that:
 - (i) addresses the needs of students with disabilities;
 - (ii) encourages students who believe they may need reasonable adjustments at any stage of their application or their participation in the course to make appropriate disclosures about the nature of their condition or requirements;
 - (iii) is accessible to the student; and
 - (iv) is made available in a range of formats.
- (b) **Institute information:** Information about entry requirements, education offerings, requirements for courses, participation, progression, facilities and resources are provided in a way that supports informed student choices.
- (c) **Processes:** Admission procedures are designed, and regularly reviewed, to ensure that students can complete them without undue difficulty.

3. Participation

Wherever possible, the Institute will employ the following strategies to support individual students who have made their particular needs known to the Institute:

- (a) **Staff training:** Staff members are aware of the services available and are trained to assist students to access the services that they need;
- (b) **Flexibility of curriculum:** Course activities are sufficiently flexible for the student to be able to participate in them;
- (c) **Flexibility of requirements:** Course requirements are reviewed, where particular student needs are known, to include activities in which the student is able to participate;
- (d) **Student consultation:** Appropriate actions and measures to enable participation by the student will be discussed, agreed and implemented;
- (e) **Additional support:** Additional support is provided where necessary to assist the student in achieving intended learning outcomes;
- (f) **Substitute activities:** Where a course includes an activity in which a student cannot participate, the student is offered an activity that constitutes a reasonable substitute within the context of the overall aims of the course; and
- (g) **Inclusiveness:** Any activities that are not conducted in classrooms and associated extra-curricular activities or activities that are part of the course, are designed to include the student.

4. Course design

Wherever possible, the Institute will employ the following strategies for individual students who have made their particular needs known to the Institute:

- (a) **Teaching and assessment:** The curriculum, teaching materials, and the assessment and certification requirements for the course are reviewed to confirm they are appropriate to the needs of, and accessible to, the student;
- (b) **Delivery modes and activities:** The delivery modes and learning activities of the course take account of intended learning outcomes and the learning capacities and needs of the student;
- (c) **Study materials:** Study materials are made available in a format that is appropriate for the student and, where conversion of materials into alternative accessible formats is required, the student is not disadvantaged by the time taken for conversion;
- (d) **Teaching strategies:** Teaching and delivery strategies for the course are adjusted to meet the learning needs of the student and address any disadvantage in the student's learning resulting from his or her disability, including through the provision of additional support, such as bridging or enabling courses, or the development of disability-specific skills for teaching staff;
- (e) **Inclusiveness:** Any activities that are not conducted in a classroom, such as field trips, industry site visits and work placements, or activities that are part of the course, are designed to include the student; and
- (f) **Assessment:** Assessment procedures and methodologies for the course are adapted to enable the student to demonstrate the knowledge, skills or competencies being assessed.

5. Support services

Wherever possible the Institute will employ the following strategies for individual students who have made their particular needs known to the Institute:

- (a) **Staff awareness:** Staff members are aware of the specialised services available for the student and are provided with information that enables them to assist the student to access the services that student needs;

- (b) **Facilitation of service provision:** Provision of specialised services for the student, where necessary, is facilitated, including through collaborative arrangements with specialised service providers;
- (c) **Provision of specialised equipment:** Any necessary specialised equipment is provided to support the student in participating in the course; and
- (d) **Support staff:** Appropriately trained support staff are made available to students with disabilities.