Item 19 Anti-discrimination Assessment

Submission Form: *Item 19 | TPOF 2025 Process Requirements: 5.1*

Training package / product(s)	BSB Training Package Units of Competency (UoC) / Uplift Digital Capability
Activity ID	FSO_ANN_2425_004
Activity manager / Project lead	Joanne Fuller, Senior Project Manager
ADA assessor name	Diana Egan
ASA assessor organisation / role	Self-employed / VET Consultant
Date of assessment	22 June 2026
Version	v1.0
Date products provided for review	22 May 2026
Confidentiality classification	For Training Package Product Submission Use

SECTION 1 - PURPOSE AND LEGISLATIVE FRAMEWORK

1.1 Purpose

This Anti-Discrimination Assessment (ADA) has been completed in response to the development of digital capability units of competency (UoC) suitable for inclusion in the BSB Training Package.

The ADA will be submitted to the Training Package Assurance Body (Assurance Body) under the Training Package Organising Framework (TPOF 2025) as evidence that the updated training products have been assessed against anti-discrimination legislation and associated standards and regulations, including the Disability Standards for Education 2005.

The ADA covers three dimensions:

- **Process dimension**: that consultation and engagement methods were inclusive and responsive to the needs of vulnerable and minority cohorts.
- **Content dimension:** that the training products themselves do not use discriminatory language and do not directly or indirectly discriminate against any protected attribute.
- **Evidence:** provide evidence for submission to the Training Package Assurance Body (Assurance Body).

1.2 Applicable standards, legislative and regulatory framework

The ADA must address how the training products comply with the following standards, legislation and instruments:

Legislation / instrument	Relevant protected attributes / key provisions
Age Discrimination Act 2004	Direct and indirect discrimination on the grounds of age in education and training contexts. Unlawful to refuse application as a student or deny access to benefits on the grounds of age.
Australian Human Rights Commission Act 1986	Complaints and inquiries relating to human rights breaches. Training products must not undermine the human rights of any person.
Disability Discrimination Act 1992 (DDA)	Disability includes physical, intellectual, psychiatric, sensory, neurological, and learning disabilities. Unlawful to discriminate directly or indirectly, or to fail to make reasonable adjustments.
Disability Standards for Education 2005 (DSE 2005)	Training providers must make reasonable adjustments to enable students with disability to participate on the same basis as other students. Products must not preclude reasonable adjustment.
Racial Discrimination Act 1975	Discrimination on the grounds of race, colour, descent, national or ethnic origin, or immigrant status — direct and indirect.
Sex Discrimination Act 1984	Discrimination on grounds of sex, marital status, pregnancy, potential pregnancy, and family responsibilities.
Work Health and Safety Act 2011 (Cth) and State/Territory equivalents	Training Package product development rules that set out the product and process requirements that Training Package developers must comply with when they develop and update training package products.

Relevant framework documents	Description
Training Package Organising Framework (effective 1 July 2025)	Training Package product development rules that set out the product and process requirements that Training Package developers must comply with when they develop and update training package products.

Relevant framework documents	Description
Training Package Assurance – Approach to Assurance (July 2025)	Sets out the quality assurance process used by the Assurance Body to assess Jobs and Skills Council (JSC) submissions against the TPOF across four stages: completeness check, submission review, evaluation and Executive Director sign-off.
Training Package Assurance Submission Compliance Guide v1.0	Explains how the Assurance Body reviews JSC submissions across four assurance assessment groups: technical committee, consultation activity, training product content, pre-submission obligations.

1.3 Scope of assessment

Product code	Product title	Training product type	Change type
See Appendix A	32 digital competence UoCs	Unit of competency	Major change

SECTION 2 - ASSESSOR DETAILS AND EXPERTISE

2.1 Assessor qualifications and experience

The Assurance Body will consider whether the assessor has the appropriate skills and expertise to conduct the assessment. As noted in the Submission Compliance Guide, it may be more appropriate for an educational expert with industry expertise to conduct the assessment rather than a lawyer who can apply legislation literally without considering educational context.

Item	Details
Full name of assessor	Diana Egan
Organisation / role	Self-employed / VET Consultant
Relevant qualifications	Bachelor of Arts (Psychology) Graduate Diploma in Business Administration Graduate Certificate in Leadership Diploma in Assessment and Training Systems Diploma in Business Certificate IV in Training and Assessment

Item	Details
Relevant industry / VET experience (summarise in 3–5 sentences)	Over 35 years' teaching and management experience in the education and training sector, operating at strategic, tactical and operational levels (spanning Head Teacher to Director, and VET consultancy roles).
Anti-discrimination / equity experience	To effectively perform the following roles, a sound knowledge of anti-discrimination and equity legislation and regulations and their implications was required. • Lead a team of educational specialists to tender for, and secure, a multimillion-dollar national contract for the delivery of language, literacy and numeracy (LLN) programs. • Guided a team of internal and external stakeholders to develop a TEQSA accredited undergraduate degree in the rapidly changing aged services sector. • Developed a TAFE NSW Institute access and equity strategy to deliver coordinated and efficient learner support services to sufficient learner success for up to 10K students annually. • Managed and led an Institute based teaching faculty to deliver quality, innovative pre-vocational and LLN services to over 5K students annually to support their vocational skills development.
Educational / RTO experience	1985-2023 - TAFE NSW – roles including Teacher, Head Teacher, Business Development Manager, Professional Officer and Faculty Director. 2024-25 – The College at Western Sydney University – VET Consultant.
Conflict of interest declaration (if any, state how managed)	Nil / See attached declaration

SECTION 3 - ASSESSMENT PROCESS

3.1 Method and approach

Describe the process used to conduct the assessment including consultation processes and inclusion considerations:

When was the assessment conducted?
26 June 2026
What materials were reviewed?
• Activity Project Submission, Department of Employment and Workplace Relations • Companion Volume Implementation Guide (CVIG) – BSB Business Services Training Package (Version 9)

• Units of competency (UoC) – see Appendix A for list of 32 UoCs • Public and Government Consultation Feedback Analysis (April 2025) • Unit mapping report (20260128 AUSMASA Digital Capability Briefing) • Consultation workshop summaries and feedback analysis Project reports • Project milestone reports
Who else was involved?
FSO Director, VET Compliance | FSO Activity Manager | Independent ADA Assessor
Was external or specialist consultation undertaken?
Yes, the ADA Assessor is an external consultant.
What consultation methods were used, how was the assessment documented and any findings tracked?
A structured approach was adopted with an initial consultation to define gather background information, parameters and expected deliverables; data and evidence collection; analysis and formulation of initial responses; collaboration to understand and action recommendations; and lastly a closure meeting. The assessment was documented and findings tracked using a standard ADA checklist and existing consultation documentation.
Summary of consultation outcomes and actions taken
See Table 5.2 Key findings and recommendations below.

SECTION 4 - ANTI-DISCRIMINATION ASSESSMENT CHECKLIST

Checklist item	Activity manager / developer response and evidence	ADA assessor response
A. Packaging rules and elective design	**☒ YES ☐ NO ☐ N/A** The 32 digital capability UoCs have been designed to provide maximum packaging flexibility and reduce disadvantage. Key design features: (1) All 32 units are available as standalone Statements of Attainment, supporting learners who cannot access full qualifications. (2) All units are available as elective imports into any BSB qualification and, subject to packaging rules of receiving qualifications, into other training packages. (3) No elective rules inadvertently limiting access for learners with specific needs. Consultation feedback (Issue 10, Public and Government Consultation Feedback Analysis, April 2026) confirmed very strong stakeholder support for all packaging options across all written submissions and widespread workshop participation. Multiple workshop participants endorsed packaging flexibility as essential to enabling access across diverse industries, learner groups, and geographic contexts.	**Adequately considered?** **☒ YES ☐ NO** The suite of 32 units has been designed with exemplary packaging flexibility. The availability of standalone Statements of Attainment, and elective importation across training packages, collectively address packaging barriers for the full range of learner cohorts and industry contexts. Consultation evidence documents very strong and broad stakeholder endorsement of all packaging options. No packaging rules have been identified that inadvertently limit access.
B. Pre-requisites and entry requirements	**☒ YES ☐ NO ☐ N/A** No pre-requisites or formal entry requirements have been applied to any of the 32 digital capability UoCs. This was a deliberate design decision to maximise access, particularly for learners in regional and remote areas, CALD learners, First Nations learners, people with disability, and mature-age workers re-entering the workforce. The absence of prerequisites was endorsed by consultation participants. Pathway-in guidance will be provided in the CVIG appendix, cross-referencing relevant	**Adequately considered?** **☒ YES ☐ NO** . The decision to apply no prerequisites to any of the 32 units is well-founded and clearly evidenced as a deliberate equity-centred design choice. The CVIG pathway-in guidance and pre-delivery needs assessment process are appropriate non-mandatory mechanisms that support learner readiness without creating formal entry barriers. The specific attention to CALD and First Nations learners in remote and regional communities, and the cross-referencing of FSK qualifications and ACSF

Checklist item	Activity manager / developer response and evidence	ADA assessor response
	Foundation Skills (FSK) and Australian Core Skills Framework (ACSF) level expectations to assist RTOs in supporting learners who may require pre-engagement scaffolding before entering Basic-level units. This is specifically addressed for CALD and First Nations learners in remote and regional communities (Priority Cohort Consultation Feedback Analysis, Issues 4 and 6, May 2026). to help RTOs identify learner readiness without creating formal entry barriers (Priority Cohort Consultation, Issue 14).	levels, demonstrate thoughtful consideration of the full range of cohorts likely to engage with these units.
C. Multiple entry and exit points	☐ **YES** ☐ **NO** ☒ **N/A** This activity involves the development of 32 standalone UoCs, not a full qualification redesign. Multiple entry and exit point design is a qualification-level consideration. However, the suite has been deliberately structured to support maximum flexibility: all 32 units can be delivered as standalone Statements of Attainment (supporting exit at any point) and the progressive proficiency structure (Basic AQF 2 through Highly Advanced AQF 5) creates a natural entry and exit pathway for learners at all stages of digital capability development. Consultation confirmed very strong stakeholder support for standalone delivery, RPL pathways, and flexible entry and exit options (Issues 7 and 10, Consultation Feedback Analysis; Priority Cohort Issues 4 and 15).	**Adequately considered?** ☒ **YES** ☐ **NO** This activity involves the development of UoCs, not qualification redesign, and the N/A response is appropriate. Notwithstanding, the Activity Manager has demonstrated that the unit suite actively supports flexible access through standalone Statement of Attainment delivery and a progressive AQF 2–5 structure. This exceeds what would be expected of a UoC-only activity and is commended.
D. Performance criteria	☒ **YES** ☐ **NO** ☐ **N/A** Performance criteria across all 32 UoCs were reviewed through multiple Technical Committee (TC) meetings (October 2025–May 2026) and public and government consultations (February–March 2026). A systematic verb and	**Adequately considered?** ☒ **YES** ☐ **NO** The systematic verb and language audit across all 32 units, conducted in response to very strong and highly convergent consultation feedback, represents a thorough and evidence-based response to

Checklist item	Activity manager / developer response and evidence	ADA assessor response
	language audit was completed as part of the post-consultation redraft, with the following outcomes: (1) basic units (AQF 2) - computational thinking and programming references simplified or removed; analytical language reframed to guided, routine tasks appropriate to AQF 2 (2) intermediate units (AQF 3) - element-level feedback from Northern Metropolitan TAFE across BSBXXX109–113 addressed through verb replacement (eg 'manage' replaced with 'use' or 'apply', 'analyse' replaced with 'describe' at appropriate levels). (3) advanced units (AQF 4) - enterprise-level and strategic language (eg 'strategic decisions', 'governance and policy development', 'autonomy and authority') replaced with operational, applied, and team-level language appropriate to AQF 4 (4) highly advanced units (AQF 5) - governance, policy ownership, and systems thinking framing calibrated to AQF 5 applied and operational outcomes. This calibration was the most consistently raised issue across consultation (Recommendation 1, very strong convergence, four written submissions and seven workshop participants). A plain language review was also completed (Recommendation 4), replacing specialist jargon identified across consultation (eg 're-elaboration' replaced with 'adaptation'; 'cognitive and affective bias' replaced ith 'human bias'; 'corporate' replaced with 'workplace'). Language is free from discriminatory assumptions about capability, gender, or background. Reasonable adjustments can be made across all 32 units without compromising vocational outcomes.	indirect discrimination risk. The calibration of action verbs to AQF level descriptors at each proficiency level directly addresses the risk of language that could create disproportionate barriers for learners with learning disabilities, lower educational backgrounds, and CALD learners. The plain language review (Recommendation 4) further reduces access barriers. Language is free from discriminatory assumptions about capability, gender, or background. Reasonable adjustments can be made without compromising vocational outcomes across all 32 units.

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E. Foundation skills	**☒ YES ☐ NO ☐ N/A** Foundation skills are described at unit level per TPOF 2025 requirements for stand-alone UoC. Key foundation skills considerations: (1) ACSF alignment - TAFE QLD raised that workplace-focused units should not be rated at ACSF Level 2 (personal context) and, in response all workplace-delivery units have been reviewed to ensure ACSF ratings reflect the workplace context (Recommendation 13, Consultation Feedback Analysis). (2) Oral communication - performance requirements are expressed flexibly to include written, digital, and visual communication modes, not only oral communication. This is particularly important for non-speaking individuals and those with speech-related disabilities, and for CALD learners for whom oral English may present a barrier. (3) (4)	**Adequately considered?** **☒ YES ☐ NO** Foundation skills are appropriately addressed at unit level as per TPOF 2025. The flexible treatment of oral communication — allowing written, digital, and visual modes — is a significant inclusion consideration for non-speaking individuals, those with speech-related disabilities, and CALD learners. The ACSF alignment review and CVIG Appendix pathway-in guidance demonstrate active consideratio n of the foundation skills needs of priority cohorts. The co-development of a plain-language terminology glossary with the TAFE SA AMEP/SEE team is noted as a particularly strong and evidence-based response to the language accessibility barrier identified through priority cohort consultation.
F. Performance evidence	**☒ YES ☐ NO ☐ N/A** PE requirements across all 32 UoCs were reviewed through TC meetings and public and government consultation. Key design principles: (1) volume and frequency - a minimum of two scenarios per unit confirms consistent skill application without creating undue burden. Simulated environments are explicitly accepted across all 32 units, removing the need for learners to access a specific workplace. (2) simulated environments - explicitly accepted across all 32 units, removing geographic and access barriers. (3) Learner workplace contexts - using a learner's own workplace as an assessment context is endorsed as an alternative to generic simulation,	**Adequately considered?** **☒ YES ☐ NO** Performance evidence requirements have been reviewed comprehensively and respond directly to equity concerns raised through consultation. The two-scenario minimum is proportionate. The explicit acceptance of simulated environments, learner workplace contexts, and mobile-first delivery addresses geographic, device, and access barriers for the full range of priority cohorts. The vendor-neutral AI tool access guidance appropriately avoids imposing an economic barrier on lower-SES learners and regional RTOs.

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	supporting access for diverse cohorts. (4) (Priority Cohort Consultation, Issue 9). (5) RPL evidence: vertical unit PE includes a universally praised self-assessment tool, with detailed RPL guidance in the CVIG on acceptable evidence, inference guidelines, and minimum evidence requirements (Issue 7 outcome, supported by FAPSTC, TAFE QLD, NM TAFE, and multiple workshop participants). All PE design changes were endorsed by the TC. Volume and frequency of evidence do not create undue barriers. Reasonable adjustments can be made across all 32 units.	
G. Assessment conditions	**☒ YES ☐ NO ☐ N/A** Assessment conditions across all 32 UoCs are proportionate, necessary, and designed to allow reasonable adjustment. Key outcomes: (1) simulated environments are explicitly endorsed as an alternative to workplace delivery across all 32 units, removing geographic and employer-access barriers (2) no specific location references that would disadvantage regional or remote learners are retained in any unit (3) reasonable adjustments can be made for learners with disability, CALD backgrounds, or other equity considerations without compromising vocational outcomes (4) AI unit assessment conditions (BSBXXX106, 114, 122, 130) (Priority Cohort Consultation, Issue 9) (6) learner's own workplace is endorsed as an alternative assessment environment. All assessment condition decisions were endorsed by the TC.	**Adequately considered?** **☒ YES ☐ NO** Assessment conditions across all 32 units are proportionate, necessary, and equity conscious. The explicit endorsement of simulated environments, vendor-neutral AI tool language, mobile-first delivery, and learner workplace contexts collectively ensure that no assessment condition creates an unreasonable geographic, economic, or device-access barrier. Reasonable adjustments can be made without compromising vocational outcomes. No location-specific requirements have been identified.
H. Mandatory workplace requirements (MWR)	**☐ YES ☐ NO ☒ N/A** No MWR are included in any of the 32 digital capability UoCs. Assessment can be conducted in a simulated environment across all 32 units. The decision to exclude MWR was a deliberate design choice to	**Adequately considered?** **☒ YES ☐ NO** N/A justification accepted and well-reasoned. The absence of MWR's across all 32 units is a deliberate and appropriate design decision that materially improves

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	maximise access for diverse learner cohorts, including First Nations learners in remote communities, CALD learners in AMEP and SEE programs, people with disability, mature-age workers reskilling outside the workplace, and learners in regional and remote areas. Consultation confirmed broad support for this approach (Issues 7 and 10, Consultation Feedback Analysis; Priority Cohort Issues 15 and 13).	access for the priority cohorts identified through consultation - including First Nations learners in remote communities, CALD learners in AMEP and SEE programs, people with disability, and mature-age workers reskilling outside the workplace. This decision is supported by consultation evidence and is consistent with the generalist, cross-sector design intent of the unit suite.
I. Contemporary and inclusive language	**☒ YES ☐ NO ☐ N/A** All 32 UoCs were reviewed for contemporary and inclusive language by the UoC writer, the TC, and the ADA consultant. Key outcomes: (1) a comprehensive plain language review was completed (Recommendation 4, Consultation Feedback Analysis, very strong convergence across six of nine respondents), replacing specialist jargon with accessible language throughout the suite (2) principles-based framing adopted for diversity characteristics ('includes/for example' language) rather than exhaustive lists that risk unintended exclusion (3) gender-neutral language is used throughout (4) the acronym 'ATSI' does not appear; inclusive terminology is used for First Nations peoples (5) 'people/person with a disability' language is used (not 'special needs') (6) 'non-speaking' is used where relevant (not 'non-verbal'). (7) 'workers' and 'individuals' used as appropriate for the generalist cross-industry context. (8) Good Things Australia (consultation email submission) and Industry Skills Advisory Council Northern Territory (ISACNT) recommendations on accessible language for CALD, low-digital-confidence, and First Nations learners	**Adequately considered?** **☒ YES ☐ NO** The language review is thorough and evidence-based, addressing specific terminology concerns raised by a wide range of consultation respondents. Principles-based framing for diversity characteristics is best practice and avoids the risk of unintended exclusion through omission. The use of contemporary disability language ('people/person with a disability'), the absence of 'ATSI', and the gender-neutral framing throughout are all confirmed. The CVIG guidance on non-biased and inclusive language for trainers and assessors is a valuable addition that extends inclusive practice beyond the units themselves into delivery.

Checklist item	Activity manager / developer response and evidence	ADA assessor response
	were incorporated (9) the CVIG Appendix will include guidance on non-biased and inclusive language for trainers and assessors.	
J. Elimination of discriminatory language	**☒ YES ☐ NO ☐ N/A** All drafts were reviewed to identify and remove language that could be considered discriminatory against any protected attribute. Key changes across the 32 UoCs: (1) AI unit governance language reviewed against Australian Government AI guidelines, OECD principles, and specialist feedback (Recommendation 11), to ensure disclosure, attribution, and synthetic media risks are appropriately addressed without introducing language that implies capability or background assumptions (2) systematic verb and language audit (Recommendation 1) removed language implying disproportionate performance expectations inconsistent with AQF level and role scope (3) exhaustive protected-attribute lists replaced with principles-based language ('includes/for example' framing) to avoid unintended exclusion by omission (4) 'corporate' replaced with 'workplace' or 'organisational' throughout to remove private-sector framing that disadvantages government, not-for-profit, and community sector workers. All language changes were endorsed by the Technical Committee.	**Adequately considered?** **☒ YES ☐ NO** The systematic review of all drafts against each protected attribute demonstrates diligent anti-discrimination practice. Key changes - AI governance language alignment to OECD principles, verb-level audit removing disproportionate performance expectations, replacement of exhaustive attribute lists with principles-based framing, and the removal of private-sector framing that could disadvantage community and government sector workers — are all well-reasoned and evidenced.
K. Indirect discrimination - protected attributes	**☒ YES ☐ NO ☐ N/A** The 32 UoCs and their assessment conditions were reviewed for indirect discrimination risks. Key issues identified and addressed: (1) AQF language calibration - verb and language audit (Recommendation 1) addressed indirect discrimination risk from language pitched above AQF level, which could have	**Adequately considered?** **☒ YES ☐ NO** Indirect discrimination risks have been actively identified and addressed across multiple dimensions. The AQF verb calibration, AI tool access economics, device access (mobile-first), removal of programming barriers at basic level, and attention to AI English-language bias for

Checklist item	Activity manager / developer response and evidence	ADA assessor response
	created disproportionate barriers for learners with learning disabilities, lower educational backgrounds, and CALD learners (2) AI tool access - assessment conditions for AI units reviewed to avoid presupposing commercial AI tool subscriptions - an economic barrier potentially disadvantaging lower-SES learners and regional RTOs. Device access - mobile-only delivery confirmed as acceptable for basic-level units, removing an indirect barrier for learners without laptop or desktop access (Priority Cohort Issue 9) (4) programming and computational thinking - removed from basic-level units following consultation feedback that this inadvertently created a specialist IT barrier in units designed for generalist workers (Recommendation 9) (5) no physical capability requirements not essential to the vocational outcome are retained in any unit (6) AI English-language bias - CVIG Appendix guidance will addres s implications for delivery to non-English-first learners, including First Nations learners in remote communities (Priority Cohort Issues 12) (7) no time or location requirements that would disadvantage carers or shift workers are imposed (8) First Nations cultural protocols for AI tool use addressed in BSB CVIG Appendix with NACCHO and AH&MRC. (Priority Cohort Issue 10).	First Nations learners in remote communities together constitute a comprehensive indirect discrimination response. The absence of physical capability requirements, location requirements, or time constraints that could disadvantage carers or shift workers is confirmed. The NACCHO/AH&MRC process for First Nations AI cultural protocols further mitigates indirect discrimination risk through culturally appropriate tool use guidance.

Checklist item	Activity manager / developer response and evidence	ADA assessor response
L. Location references and regional access	**☒ YES ☐ NO ☐ N/A** No unnecessary location references are included in any of the 32 digital capability UoCs. Assessment conditions are framed to allow multiple delivery contexts. Key outcomes: (1) simulated environments explicitly accepted across all 32 units, removing the requirement for learners to be in any specific geographic location (2) no state- or city-specific references retained (3) the consultation process was designed from the outset to include regional, rural, and remote voices, workshops were conducted in all states and territories including NT, WA, TAS, regional QLD, and remote NT. ISACNT consulted 23 NT organisations. Defence Digital Group (national) also participated (4) Mobile-first delivery guidance in the CVIG ensures remote-community learners are not excluded by assessment conditions framed around desktop access.	**Adequately considered?** **☒ YES ☐ NO** No unnecessary location references are present in any of the 32 units. The consultation process demonstrably included regional, rural, and remote voices through all-states-and-territories engagement, ISACNT participation, and the dedicated First Nations workshop. Mobile-first delivery guidance ensures remote-community learners are not excluded by implicit desktop-centric assessment design.
M. Disability Standards for Education 2005	**☒ YES ☐ NO ☐ N/A** The 32 digital capability UoCs have been assessed against the DSE 2005. Key findings: (1) no assessment requirements prevent reasonable adjustment across any of the 32 units (2) simulated environments are explicitly accepted across all units, supporting learners who cannot access specific workplace environments (3) communication methods are expressed flexibly to include written, digital, and visual modes no oral communication requirement is imposed (4) no physical capability requirements not essential to vocational outcomes are retained (5) mobile-first delivery is confirmed as acceptable for basic-level units, supporting learners with limited device access (6) the CVIG Appendix includes a mandatory access and equity section with:	**Adequately considered?** **☒ YES ☐ NO** The products have been assessed against the DSE 2005. No assessment requirements prevent reasonable adjustment across any of the 32 units. The comprehensive access and equity section in the CVIG addresses all mandatory components. It is noted that full compliance with DSE 2005 obligations rests with individual RTOs as education providers, in consultation with enrolled students.

Checklist item	Activity manager / developer response and evidence	ADA assessor response
	implementation considerations; reasonable adjustment guidance; contextualisation for diverse learners (CALD, First Nations, mature-age, regional/remote, school leavers); avenues for raising concerns; and sector-specific equity considerations (7) assistive technology use is not excluded by any assessment condition.	
N. Vulnerable and minority cohorts - process	**☒ YES ☐ NO ☐ N/A** The development of the 32 digital capability UoCs has engaged with vulnerable and minority cohorts across two distinct phases of consultation. **Phase 1** Public and Government Consultation (February–March 2026) Written submissions and 31 consultation workshops were conducted with 170+ registered participants from 80+ organisations. Respondents included community training providers focused on digital inclusion, a First Nations data sovereignty specialist, union and industry representatives, and practitioners working with CALD learners. Two written submissions (Good Things Australia, a community provider, and Kowa Collaboration, a First Nations specialist) specifically addressed vulnerable and minority cohort considerations. Both reviews were agreed and CVIG actions confirmed (Consultation Feedback Analysis, April 2025, Recommendations 12 and 13). **Phase 2** — Priority Cohort Consultation (13–15 May 2026) Three dedicated workshops were conducted to test the revised units against the implementation realities of priority learner cohorts as follows: (1) workshop held on 13 May 2026 - thirty-plus VET practitioners, RTO staff, and industry	**Adequately considered?** **☒ YES ☐ NO** The consultation process demonstrates genuine, structured, and well-documented engagement with vulnerable and minority cohorts across both phases of the activity. The use of three dedicated priority cohort workshops — rather than relying on general consultation to capture these perspectives — reflects a deliberate design choice that is commended. Workshop 34 and Workshop 35 in particular produced substantive, operationally specific feedback that is directly traceable to confirmed CVIG Appendix actions. Good Things Australia's and Kowa Collaboration's written submissions from Phase 1 demonstrate that disability, digital inclusion, and Indigenous Data Sovereignty perspectives were engaged before the priority cohort phase, providing a prior-evidence base that the priority cohort workshops then deepened. The CALD consultation with the TAFE SA AMEP and SEE team produced the most operationally specific access and equity evidence in the entire consultation record. The confirmed CVIG Appendix actions arising from that session - the co-developed terminology glossary, confidence-building and retention-aware delivery guidance, and device-switching guidance - are directly responsive to documented barriers and

Checklist item	Activity manager / developer response and evidence	ADA assessor response
	experts from across Australia participated, including practitioners with specific CALD delivery experience, a rural and remote RTO perspective, and a worker and industry representative. Three learner personas anchored the discussion: May (a CALD migrant learner), Jayden (a First Nations learner from a regional community), and Susan (a mature-age worker reskilling after retrenchment).) Five senior lecturers from TAFE SA's Adult Migrant English Program (AMEP) and Skills for Education and Employment (SEE) programme provided specialist practitioner insight on language and comprehension barriers, technology anxiety, skill retention challenges, device access constraints, and delivery methodology for migrant and refugee learners. Feedback was very strong and convergent across all participants in relation to CVIG Appendix actions and the need for: a terminology glossary at AQF 2 plain English (co-developed with the TAFE SA team); confidence-building delivery guidance including sequencing recommendations; retention-aware assessment design; device-switching and mobile-first delivery guidance; and pathway-in guidance for learners below the basic proficiency threshold (Issues 4, 6, 7, 8, 9, Priority Cohort Consultation Feedback Analysis, May 2026) (3) workshop 35 - First Nations Consultation (15 May 2026). Twelve named participants and approximately 25 additional registered participants from First Nations RTOs, community-controlled organisations, and peak bodies.	are proportionate responses. The commitment to engage the TAFE SA team's existing in-house glossary work rather than recreating it from scratch is noted as good practice. The breadth of First Nations representation in Workshop 35 is significant: and constitutes a credible and representative consultation base.
O. Companion Volume Implementation	**☒ YES ☐ NO ☐ N/A** A CVIG Appendix will be updated as a separate, navigable Digital Capability appendix (confirmed Priority 1 structural	**Adequately considered?** **☒ YES ☐ NO**

Checklist item	Activity manager / developer response and evidence	ADA assessor response
Guide - Access and Equity	decision, Priority Cohort Consultation Issue 1). The CVIG update has been confirmed by the TC and will include implementation considerations - including standalone, embedded, and qualification-import delivery models (2) terminology glossary (AQF 2 plain English) (3) pathway-in guidance (FSK/ACSF cross-references) (4) AI tool access guidance (vendor-neutral) (5) device-switching and mobile-first guidance (6) cultural protocols for AI use, and (7) First Nations AI engagement framework.	The CVIG update as described is comprehensive and responsive to the full range of access and equity concerns identified through consultation. The decision to develop a separate, navigable Digital Capability appendix — rather than embedding content in the existing 130+ page BSB CVIG — is strongly endorsed as the correct response to practitioner feedback that the current format is not fit for purpose. All mandatory DSE 2005 access and equity components are addressed. The range of additional guidance items developed in response to priority cohort consultation demonstrates exemplary responsiveness.
P. Assessor recommendations and actions taken	**☒ YES ☐ NO ☐ N/A** FSO confirms all accepted recommendations will be reflected in final training products or CVIG prior to submission.	**Adequately considered?** **☒ YES ☐ NO** Final draft training products were reviewed and recommendations recorded in Section 5.2 together with FSO's response. Where recommendations are not incorporated, a rationale will be provided. FSO confirms all accepted recommendations will be reflected in final training products or CVIG prior to submission.

SECTION 5 - SUMMARY OF FINDINGS

5.1 Overall assessment outcome

☒ **SATISFACTORY** *All checklist items adequately addressed. Training products meet anti-discrimination requirements as far as practicable.*	☐ **SATISFACTORY WITH RECOMMENDATIONS** *Assessment is satisfactory subject to the recommendations at Section 5.2 being addressed prior to final submission.*
☐ **NOT SATISFACTORY** *Significant anti-discrimination issues identified. Further work required before submission.*	☐ **NOT APPLICABLE TO SCOPE** *Activity is a minor administrative update with no impact on training product content (provide justification).*

5.2 Summary of key findings and recommendations

Summarise the key findings from the assessment, including any issues identified and resolved during the assessment process, and any outstanding recommendations.

#	Issue / Observation / Risk	Recommendation / Action Required	FSO Response & Action Taken
1	The CVIG update is described as confirmed in structure and content and the CVIG form factor decision (separate navigable appendix with machine-readable source), are identified as Priority 1 decisions that must be resolved before the CVIG update can be finalised. The current ADA cannot confirm adequacy of the CVIG Appendix as a completed product — only as a confirmed commitment. Submission should include evidence that the Priority 1 structural and co-design decisions have been actioned.	FSO to provide, at or before submission, evidence that: the separate Digital Capability CVIG Appendix has been initiated in structured machine-readable format.	This has been completed.

SECTION 6 - DECLARATION

6.1 Assessor declaration

I, Diana Egan, confirm that:

- I have independently reviewed the training products listed in Section 1.3 of this assessment.
- I have assessed those products against the relevant anti-discrimination legislation and associated standards and regulations, including the Disability Standards for Education 2005.
- I am satisfied that the training products being submitted meet, as far as practicable, relevant anti-discrimination legislation, and that adequate evidence of processes to address potential issues has been provided.
- I have declared any conflicts of interest in Section 2 of this assessment.
- Any recommendations I have made are recorded in Section 5.2, along with the FSO's response.

Assessor name: Diana Egan	**Organisation / role:** Self, employed, VET Consultant
Signature: Diana Egan	**Date**: 30 June 2026

6.2 Activity manager / FSO CEO acknowledgement

Where FSO CEO Declaration (submitted with the Training Product Submission Form) covers this ADA, this section may be noted as covered by that declaration. Otherwise, the Activity Manager should sign below to confirm that the checklist responses are accurate and complete.

Name: Joanne Fuller	**Role:** Senior Project Manager
Signature: Joanne Fuller	**Date:** 1 July 2026