

Anti-Discrimination Assessment

Activity

Activity ID	MAS_ANN_2526_001
Activity title	Handling Automotive Flammable Refrigerant Gases

Scope

The following documentation was reviewed for the anti-discrimination assessment.

Qualifications	One revised qualification: AUR20226 Certificate II in Automotive Air Conditioning Technology
Skill sets	Four revised skill sets: AURSS00041 Vehicle Air Conditioning Install and Overhaul Skill Set AURSS00042 Vehicle Air Conditioning Installation Skill Set AURSS00044 Vehicle Air Conditioning Service, Retrofit and Repair Skill Set AURSS00045 Vehicle Refrigerant Recovery Skill Set
Units of competency	Six revised units of competency: AURETU101 Install air conditioning systems AURETU107 Overhaul air conditioning and HVAC system compressors AURETU202 Recover vehicle refrigerants AURETU203 Service air conditioning and HVAC systems AURETU204 Diagnose and repair air conditioning and HVAC components AURETU205 Retrofit automotive air conditioning and HVAC systems
Companion Volume Implementation Guide	AUR CVIG mapping tables AUR20226 supplement to the CVIG

Declaration

I confirm that:

- ✓ I have reviewed the documentation included in the scope identified above.
- ✓ The training products meet the requirements of Commonwealth anti-discrimination legislation, the Disability Standards for Education 2005, and the Training Package Organising Framework (TPOF).
- ✓ I am independent of the development of the training products and have no conflict of interest.

Anti-discrimination Assessor	Tina Berghella
Assessor qualifications and expertise	Tina Berghella has over 25 years of experience working as an independent consultant in the VET sector. Her qualifications include a Bachelor of Applied Science (Hons), a Post Graduate Diploma in Management Studies, a Graduate Diploma in Adult Language, Literacy and Numeracy Practice, a Diploma in Quality Auditing, a Diploma of Training and Assessment, a Certificate IV in Small Business Management and a Certificate IV in Training and Assessment. As a member of the Australian Government's Training Package Quality Assurance Panel from 2008 until its closure, Tina conducted over 50 equity reviews of training package submissions. Tina is an LLND specialist experienced with working with learners who are disadvantaged. She has also worked with disability and mental health services to develop and implement quality systems to meet industry standards and support internal capacity building.
Signature	
Date	28/07/26

Assessment checklist

Item	Reference	Assessor comments and recommendations Detail evidence identified, recommendations made and how those recommendations were addressed.	Developer response to assessor Where relevant, provide brief commentary on how the comments and recommendations were responded to
1 Do the training products support access? <i>For example, multiple entry/exit points, minimal prerequisites, flexible packaging rules and no location restrictions.</i>	TPOF Product Requirements and Quality Principles	✓ Yes ☐ No ☐ NA The qualification AUR20226 specifies no entry requirements. None of the four skill sets specifies entry requirements. No pre-requisite units apply to any of the six units of competency. The packaging rules are flexible. Of the 13 units required, seven are elective, and up to three of these may be drawn from a Certificate I qualification or above in this or another endorsed Training Package, or from an accredited course. No mandatory workplace requirements apply. Assessment conditions across all six units allow competency to be demonstrated in a workplace or a simulated environment that accurately reflects real workplace performance. Direct observation, third-party evidence and assessor questioning are all available. This supports flexible assessment and removes location-based barriers to access. The following observations are noted.	✓ Yes ☐ No ☐ NA 1.1 Noted. The requirement to hold, or be enrolled in, one of the listed qualifications is a genuine access requirement and is intentional. AURSS00041, AURSS00042 and AURSS00044 are constructed on the skill set template, which provides the fields Overview, Description, Legislative / Licensing / Regulatory, Pathways, Skill Set Requirements, Target Group and Suggested Words for Attainment. That template contains no Entry Requirements field, so there is no field to which the requirement could be relocated. It is placed under Pathways Information because that is the only available field. The wording will therefore remain unchanged. The requirement operates as an access requirement rather than a barrier: the skill set may be undertaken as part of one of the listed qualifications by learners enrolled concurrently, and in addition to one of those qualifications by learners who

		AURSS00041, AURSS00042 and AURSS00044 each state, under Pathways Information, that the skill set "may only be undertaken in addition to or as part of" one of ten listed qualifications or equivalent. This restricts access to the skill sets. Under the TPOF, Pathways Information is the field that clarifies how the skill set outcome relates to a qualification outcome. Restrictions on access belong in the Entry Requirements field, must be expressed in terms of competency or licensing, and require a rationale in the Companion Volume Implementation Guide. 1.1 Recommendation: It is recommended that the restriction be relocated to the Entry Requirements field and expressed in terms of competency or licensing, with a rationale provided in the Companion Volume Implementation Guide. If the intent is advisory, the wording should be revised so that it does not operate as a mandated entry requirement. An ARCTick trainee licence must be held by a learner handling refrigerants during training. This requirement is stated in the Licensing/Regulatory Information field of each of the six units and in the qualification. It does not appear in any of the four skill	have already completed it or who hold the equivalent competencies. . 1.2 Accepted. The following statement are added to the Licensing/Regulatory Information field of AURSS00041, AURSS00042, AURSS00044 and AURSS00045: "Trainee licences also apply to those handling refrigerants while undertaking training. These licences are administered by the Australian Refrigeration Council, which should be contacted for further information." This aligns the skill sets with the wording already used in AUR20226 and the six units of competency. 1.3 Not adopted. The requirement for two vehicles or machinery is intentional and reflects 1:1 consultation with RTOs and Technical Committee decision. Two installations are required to establish that competence is repeatable rather than incidental to a single configuration. AUSMASA confirms that the requirement is not intended to be satisfied by a training board. The simulated environment provision in the assessment conditions governs the setting for assessment and does not alter this resource requirement.
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		sets, although all units in each skill set are subject to it. A learner reading a skill set alone would not know that a licence is required in order to do the skill set. 1.2. Recommendation: It is recommended that the following statement, which appears in the qualification, be added to the Licensing/Regulatory Information field of each of the four skill sets: <i>Trainee licences also apply to those handling refrigerants while undertaking training. These licences are administered by the Australian Refrigeration Council, which should be contacted for further information.</i> The assessment conditions for the units require access to vehicles or machinery. The requirement for RTOs to provide this is not new. The requirement in AURETU204 to provide equipment that is at minimum Class A2L capable is new. Resourcing concerns were raised during consultation and were not adopted, on the basis that safe handling of a flammable refrigerant is a core objective. That position is accepted, and these requirements are not considered discriminatory. AURETU101 requires, as an assessment resource, two vehicles or machinery each requiring installation of a new air conditioning system. The simulated environment provision governs the setting	
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		for assessment and does not remove this resource requirement. The Technical Committee advised on 19 March 2026 that the requirement is impractical, noting that full installations are rare in modern workplaces and that RTOs use training boards and simulators for this assessment. 1.3 Recommendation: It is recommended that the developer confirm whether the assessment resource requirement in AURETU101 is intended to change current RTO practice, and that the position be made clear to RTOs.	
2 Are the foundation skills explicit and free from unnecessary literacy, numeracy, or digital barriers?	TPOF Product Requirements and Quality Principles	✓ Yes ☐ No ☐ NA The qualification AUR20226 includes a Foundation Skills Outcomes field. The five Australian Core Skills Framework core skills — learning, reading, writing, oral communication and numeracy — are presented as a bar chart, each at ACSF Level 2. A descriptive statement on digital literacy is provided below the chart. This meets the requirements of the TPOF Qualification template. The units require the interpretation of safety data sheets, the Australian automotive code of practice and the Ozone Protection and Synthetic Greenhouse Gas Management Regulations 1995, and the calculation of tolerances and deviations from	✓ Yes ☐ No ☐ NA 2.1. Noted. The ACSF levels were set as an outcome statement, the level a competent person holds on completion, not as an entry benchmark. AUSMASA mapped the elements, performance criteria, performance evidence and knowledge evidence of the units comprising AUR20226 against the ACSF performance features for each core skill, then tested each against the ACSF variables affecting performance: support, context, and text and task complexity. The work described is routine, familiar workshop activity performed under supervision using manufacturer procedures, service data and

	manufacturer specifications. These demands may exceed ACSF Level 2. 2.1. Recommendation: It is recommended that the developer confirm the ACSF levels identified in the qualification, with particular reference to the reading demands of safety data sheets, codes of practice and regulatory instruments, and the numeracy demands of calculating tolerances and interpreting pressure–temperature relationships. All six units of competency populate the Foundation Skills field. The following observations are noted. None of the four skill sets includes a Foundation Skills Outcomes field. Under the TPOF Skill Set template, the Foundation skills outcomes is a mandatory field. Under the TPOF Skill Set template, Foundation skills outcomes is a mandatory field. A learner or RTO reading a skill set is given no indication of its language, literacy or numeracy demands. 2.2 Recommendation: It is recommended that a Foundation Skills Outcomes field be added to each of the four skill sets, consistent with the TPOF Skill Set template. Some foundation skills statements in five of the six units duplicate skills that are already	standard workplace records. Numeracy is confined to routine measurement, refrigerant charge weight, pressures and temperatures, lubricant quantities, using calibrated equipment and prescribed procedures. No core skill demand exceeded ACSF Level 2. Learning, Reading, Writing, Oral Communication and Numeracy were each assessed at Level 2, consistent with the AQF Level 2 outcome. Levels were not set above the demand evidenced in the units. Digital literacy is not captured in the ACSF core skills and is expressed as a descriptive statement below the bar chart, based on the digital tools and systems evidenced in the units. The analysis was presented to the Technical Committee at Meeting 4 (19 March 2026) and the Level 2 outcome was confirmed. No contrary feedback was received through public consultation. 2.2 Noted. The skill set template on which AURSS00041, AURSS00042, AURSS00044 and AURSS00045 are constructed does not include a Foundation Skills Outcomes field. The template provides the following fields: Overview, Description,
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		explicit in the performance criteria. AURETU204 does not. Each of the six units requires the completion of workplace documentation in its performance criteria. Five units also carry a Writing foundation skill describing the same task. AURETU107 PC 1.2 and AURETU203 PC 3.1 both require the candidate to access and interpret the Australian automotive code of practice, and both units also carry a Reading foundation skill describing that task. 2.3. Recommendation: It is recommended that the Foundation Skills fields be reviewed across the six units to remove statements that duplicate skills already explicit in the performance criteria, and to apply a consistent approach across the units.	Legislative/Licensing/Regulatory, Pathways, Skill Set Requirements, Target Group, and Suggested Words for Attainment. A Foundation Skills Outcomes field cannot, therefore, be added to the skill sets. 2.3 Accepted. The Foundation Skills field has been reviewed, and two statements that duplicate skills already explicit in the performance criteria have been removed.
3 Did the consultation include vulnerable and minority cohorts, such as women, people with disability, CALD, First Nations, regional and remote communities, and small business.	TPOF Process Requirements and Quality Principles	☒ Yes ☐ No ☐ NA The consultation strategy identifies a broad range of stakeholder groups, including industry peak bodies, employers, registered training organisations, unions, the industry regulator, and state and territory training authorities. The Australian Manufacturing Workers' Union and the Australian Refrigeration Council are both identified as key stakeholders, and the Technical Committee was established with tripartite	☐ Yes ☐ No ☐ NA

		representation including union representation. Consultation was open to all interested parties. Draft training products were published for public consultation, feedback was invited through the AUSMASA project page at any time, and all RTOs with the training products on scope were consulted. Stakeholders were engaged across all states and territories. Employers of varying size are represented in the consultation log, including small businesses. Regional and remote considerations were raised during consultation and addressed. The Institute of Automotive Mechanical Engineers raised the position of operators working on mobile plant in remote areas of Western Australia and the Northern Territory, who may face heat stress risk if an air conditioning system fails before a licensed technician can attend. The developer considered the matter and referred it to the Australian Refrigeration Council as a regulatory question. There is no evidence in the consultation strategy or the consultation log that consultation was specifically targeted at women, people with disability, culturally and linguistically diverse communities, or First Nations peoples. The broad public	
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		consultation process provided open access for all interested parties to contribute. No discriminatory outcomes are evident in the training products.	
4 Was the consultation feedback addressed?	TPOF Process Requirements and Quality Principles	☒ Yes ☐ No ☐ NA The consultation log records feedback received across initial development, public and government consultation, and the incorporation of feedback. Each item records the stakeholder, the stakeholder type, the jurisdiction, the method of consultation, the feedback provided, the developer's response and a status. All items are closed. Each item is assigned an action status and a documented response explaining the rationale for the decision taken. Feedback was accepted, accepted in part, or not adopted according to its merits, and reasons are given where feedback was not adopted. Feedback is demonstrably reflected in the final training products. The consultation log records Technical Committee meetings at which feedback was reviewed and positions resolved. This provides a clear and transparent record of how feedback was considered and addressed.	☐ Yes ☐ No ☐ NA

5 Do the assessment requirements allow reasonable adjustments while maintaining integrity, ensuring that learners with disability can access and demonstrate competence <i>on the same basis as</i> others?	TPOF Product Requirements and Quality Principles, Disability Standards for Education 2005	✓ Yes ☐ No ☐ NA The assessment conditions across all six units allow competency to be demonstrated in a workplace or a simulated environment that accurately reflects real workplace performance. Direct observation, third-party evidence and assessor questioning are all available as evidence-gathering methods, and the mode of questioning is not prescribed. No mandatory workplace requirements apply. Together these provide flexibility for reasonable adjustment without compromising the integrity of the assessment. The safety requirements of the units, including the selection and use of personal protective equipment, the identification and use of fire safety equipment, and the safe handling of flammable refrigerants, are inherent requirements of the work. No assessment condition was identified that would unreasonably restrict access for learners with disability. The following observation is noted. Some performance criteria and knowledge evidence identify the sense by which a task is performed rather than the outcome to be achieved. AURETU101 PC 2.2 and AURETU203 PC 2.1 refer to visually checking the installation or system, and the	☐ Yes ☐ No ☐ NA Noted: The Knowledge Evidence in both units specifies the items to be checked, so the removal of the sense-specific verb from the performance criteria does not reduce the precision of the requirement.
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		oral communication foundation skill in AURETU203 and AURETU205 refers to listening to workplace instructions. Other units express the same requirements in terms of the outcome, without reference to a particular sense. Expressing the requirement as an outcome preserves the greatest scope for reasonable adjustment.	
6 Are the training products free from direct and indirect age discrimination? <i>For example, no ageist assumptions, competence is not tied to age, and packaging rules are accessible to all ages.</i>	Age Discrimination Act 2004	☒ Yes ☐ No ☐ NA No age-based assumptions, restrictions or references were identified. Competency is performance-based and is not linked to age. The qualification specifies no entry requirements, and the packaging rules are accessible to learners of any age.	☐ Yes ☐ No ☐ NA
7 Are the training products free from direct or indirect disability discrimination? <i>For example, reasonable adjustments are possible, and</i>	Disability Discrimination Act 1992	☒ Yes ☐ No ☐ NA No exclusionary criteria were identified. The training products impose no health, fitness or physical capacity requirements, and competency is expressed in terms of workplace outcomes. The safety requirements of the units, including the selection and use of personal protective equipment, the identification and use of fire safety equipment, and the safe	☐ Yes ☐ No ☐ NA

<i>essential versus adjustable tasks are clearly distinguished.</i>		handling of flammable refrigerants, are inherent requirements of the work and are appropriately specified. Assessment conditions allow for reasonable adjustment while maintaining competency integrity and safety requirements. No direct or indirect disability discrimination risks were identified.	
8 Do the training products use inclusive language? <i>For example, sector-appropriate terminology, person first language, and no outdated or exclusionary language.</i>	Sex Discrimination Act 1984, Disability Discrimination Act 1992, Disability Standards for Education 2005, TPOF Product Requirements and Quality Principles	✓ Yes ☐ No ☐ NA Language across the qualification, skill sets and units is gender-neutral and sector-appropriate. No exclusionary or outdated terminology was identified. Terminology was systematically reviewed as part of the revision, and the changes made are documented with a rationale. The replacement of "driver and passenger" with "occupant" reflects the range of vehicle and machinery types within the scope of the units, including mobile plant, where the terms "driver" and "passenger" may not apply.	☐ Yes ☐ No ☐ NA
9 Do the assessment requirements support learning and assessment on the same basis?	Disability Standards for Education 2005, TPOF Product Requirements	✓ Yes ☐ No ☐ NA Assessment requirements allow learners to demonstrate competence on the same basis as others, subject to the inherent safety and licensing requirements of the occupation. No work placement is mandated. Assessment of performance evidence may	☐ Yes ☐ No ☐ NA

<i>For example, work placements and work-based activities are inclusive, accessible formats (such as Auslan and assistive technology) are possible, and there are no undue disadvantages.</i>	and Quality Principles	take place in a workplace or in an environment that accurately represents a real workplace, and no mandatory workplace requirements apply to the qualification. Learners are therefore not disadvantaged by an inability to obtain or attend a work placement. The form of assessment is not prescribed. Assessor questioning is required, but the mode of questioning is left open, and third-party evidence is available. Nothing in the assessment requirements precludes the use of accessible formats or assistive technology.	
10 Are the training products free from gender bias, stereotypes, or barriers? <i>For example, the use of inclusive gender-neutral language; no bias or exclusion on the basis of sex, gender identity, sexual orientation, or intersex status; no restrictions or disadvantage relating to</i>	Sex Discrimination Act 1984	✓ Yes ☐ No ☐ NA The training products do not impose barriers related to sex, gender identity, sexual orientation, intersex status, relationship status, pregnancy or caring responsibilities. Language is gender-neutral throughout, and no bias was identified in the examples or contexts used. Assessment requirements are flexible. Competency may be demonstrated in a workplace or a simulated environment, multiple evidence-gathering methods are available, no work placement is mandated, and no timing requirements are imposed. This supports full participation.	☐ Yes ☐ No ☐ NA

<i>marital/relationship status, pregnancy, or breastfeeding; and flexible assessment requirements to enable full participation.</i>			
11 Are the training products free from racial and cultural bias, and culturally inclusive? <i>For example, inclusive cultural terminology and no bias in examples or contexts.</i>	Racial Discrimination Act 1975	☒ Yes ☐ No ☐ NA No racial or cultural bias was identified. The qualification, skill sets and units are occupationally focused and do not embed culturally exclusive assumptions. No bias was identified in the examples or contexts used.	☐ Yes ☐ No ☐ NA
12 Do the training products respect broader human rights and diversity, including protection from discrimination on the basis of religion, political opinion, national extraction, or social origin?	Australian Human Rights Commission Act 1986	☒ Yes ☐ No ☐ NA No provisions were identified that would disadvantage individuals on the basis of religion, political opinion, national extraction or social origin. The training products are occupationally focused and impose no cultural or religious requirements. The products are respectful of diversity.	☐ Yes ☐ No ☐ NA

<i>For example, no indirect exclusion through cultural or religious requirements, and products are respectful of diversity.</i>			
13 Does the Companion Volume Implementation Guide include access and equity guidance?	TPOF Template Requirements, Product Requirements and Quality Principles	✓ Yes ☐ No ☐ NA The CVIG includes comprehensive guidance on access and equity, including disability and reasonable adjustment. The guidance supports equitable participation while maintaining the integrity of the training products.	☐ Yes ☐ No ☐ NA