

Anti-Discrimination Assessment

Activity

Activity ID	MAS_ANN_2425_006
Activity title	Critical Control Management for Mine Site Supervisors and Managers

Scope

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

Qualifications	RII40126 Certificate IV in Surface Extraction Operations RII50126 Diploma of Surface Operations Management RII50926 Diploma of Underground Coal Mining Management RII60226 Advanced Diploma of Extractive Industries Management RII60326 Advanced Diploma of Underground Coal Mining Management RII60826 Advanced Diploma of Surface Coal Mining Management RII32226 Certificate III in Well Servicing Operations RII41326 Certificate IV in Emergency Response Coordination
Skill sets	RIISS000131 Mine Surveying Skill Set RIISS000132 Site Health and Safety Coordinator Skill Set
Units of competency	RIICOM301 Communicate information RIIRIS402 Carry out the risk management process RIIRIS501 Implement and maintain management systems to control risk RIIRIS601 Establish and maintain risk management systems RIIWH301 Conduct initial safety and health investigations
Companion Volume Implementation Guide	RII Release 12 Companion Volume Implementation Guide RII Companion Volume Implementation Guide Addendum: Risk Management and Safety

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	21/09/26

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 Seven of the eight qualifications and both skill sets have no entry requirements. RII41326 retains the entry requirements introduced at Release 11.0, which are expressed in terms of competency, recognise equivalent prior achievement, and are supported by a rationale in the Companion Volume Implementation Guide. None of the revised units has prerequisites, and the single prerequisite in the qualifications (PUAEMR036 in RII41326) can be met from the same elective bank. All eight qualifications include units imported from other training packages in their packaging rules, and all allow one or two electives to be chosen from elsewhere in the RII Training Package, another endorsed training package or an accredited course. There are no location restrictions. However, the wording of the packaging rules for electives chosen from elsewhere, and the conditions attached to them, differs across the qualifications. RII40126, RII50126 and RII60226 require all electives to be relevant, maintain AQF alignment, avoid duplication and contribute to a valid industry-supported outcome. RII50926, RII60326, RII60826 and RII32226 require only that units selected from outside the qualification reflect outcomes at the qualification's AQF	Yes ☒ No ☐ NA

		level. RII41326 omits the requirement to avoid duplication. Inconsistent wording of the same rule may lead RTOs to interpret it differently and limit learners' access to relevant electives. Recommendation: The developer is asked to use consistent wording across the qualifications.	Response: The elective statements in RII32226, RII50926, RII60326, RII60826 and RII41326 have been updated to <i>“Elective units must be relevant to the work environment and the qualification, maintain the overall integrity of the AQF alignment, not duplicate the outcome of another unit chosen for the qualification, and contribute to a valid industry-supported vocational outcome.”</i> This means that the elective statements are consistent across all qualifications.
		The revised units, the Companion Volume Implementation Guide (CVIG) and the CVIG Addendum give different guidance on when simulated assessment may be used. The assessment conditions in all five revised units permit assessment in a simulated work environment only "where personal safety or environmental damage are limiting factors". The CVIG states that "units of competency in the RII Resources and Infrastructure Industry Training Package may be delivered and assessed in the workplace or in a simulated workplace environment", with no limiting condition. The Addendum advises that simulation may be used where an operation lacks a required element	

		(section 2.6) or where a workplace group is not available for RIIRIS402 (section 4.3), but also states that it does not create requirements additional to those in the endorsed units. RIIWHS301 adds to the uncertainty: its assessment conditions provide for "an incident (live, or simulated based on historical incidents)", then restate the general restriction to safety and environmental factors. Although the units take precedence, the broader guidance in the companion volumes creates uncertainty about the circumstances in which simulated assessment is permitted. This could lead to inconsistent interpretation across RTOs, with some permitting simulated assessment in circumstances where others do not. The CVIG Addendum also advises RTOs to establish site access requirements, including induction, medical assessment and fitness-for-work testing, before enrolment. While these are workplace requirements rather than requirements of the training products, learners who cannot meet them would depend on simulated assessment, and the circumstances in which simulation is permitted are unclear. Recommendation: The developer is asked to clarify the circumstances in which simulated assessment may be used, and to ensure the revised units, the CVIG and the Addendum are consistent.	Response: The <i>RII Companion Volume Implementation Guide</i> wording was maintained for simplicity and consistency. The <i>Training and assessment in simulated environments</i> section, supported by the <i>Workplace simulation</i>
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criteria section, provides guidance for simulations across the RII training package.

Ambiguity in relation to the circumstances in which simulated assessment is permitted in the units has been removed, and candidates are pointed to the *RII Companion Volume Implementation Guide*.

The statement in all units has been simplified to: The *Implementation Guide Addendum: Risk Management and Safety* has been used to further clarify guidance already contained in the *RII Companion Volume Implementation Guide*.

The content in 2.6 of the *Implementation Guide Addendum: Risk Management and Safety* referring to simulation has now been removed.

The content in 4.1 of the *Implementation Guide Addendum: Risk Management and Safety* referring to simulation has been retained, as it provides further contextual guidance on realistic workplace conditions and candidates' welfare.

The content in 4.3 of the *Implementation Guide Addendum: Risk Management and Safety* referring to simulation has been retained, as it clarifies the intention of “facilitation” for delivery consistency and provides further contextual guidance on realistic workplace conditions.

		The assessment conditions in the five revised units use "and" inconsistently: the first item has no connector, while the following items end with "; and,". In RIWHS301 the list is introduced with "The assessment must include access to:", but several of the items that follow, such as "be conducted in a safe environment", do not complete that statement grammatically and read as items to be accessed. Unclear drafting of mandatory assessment conditions may lead RTOs to apply them inconsistently, including when determining whether simulated assessment is permitted. Recommendation: The developer is asked to review the structure and punctuation of the assessment conditions in the revised units so that each condition reads clearly as a requirement.	Response: The structure of the assessment conditions has been reviewed and updated in all units of competency.
2 Are the foundation skills explicit and free from unnecessary literacy, numeracy, or digital barriers?	TPOF Product Requirements and Quality Principles	Yes ☒ No ☐ NA Foundation skills are explicit in all five revised units, which describe the skills required in the context of the work. The CVIG Addendum supports learners with lower literacy by advising assessors to focus on actions taken and reasoning applied where documentation is limited, and on the substance of what the candidate does rather than the volume of documentation. The reading foundation skills in RIIRIS402, RIIRIS501 and RIWHS301 require the candidate to "interprets and analyses" legislation, and in RIIRIS601 to "interprets and critically evaluates" it. These demands indicate reading at ACSF Level 5, which may exceed the	Yes ☒ No ☐ NA

		reading skills required in the workplace for some of the roles the units describe. For example, RIIWHS301 applies to those in an operational or supervisory capacity who contribute to initial investigations within their own role, and its performance evidence requires the candidate to locate, apply and follow legislation rather than analyse it. Where RIIRIS402, RIIRIS501 or RIIRIS601 is a core unit, the foundation skills outcomes for reading in those qualifications would be expected to be at ACSF Level 5. Recommendation: The developer is asked to review the reading demands in relation to legislation across the revised units so that they reflect the level of reading required for each role, and to review the foundation skills outcomes charts in the related qualifications accordingly.	Response: The reading demands in relation to legislation across the revised units have been reviewed against the role requirements and charts in the related qualifications. The descriptors for RIIRIS402, RIIRIS501 and RIIWHS301 have been modified to reflect their operational and supervisory scope. • RIIRIS402: “interprets and <i>analyses</i>” has been replaced with “interprets and <i>applies</i>”, consistent with ACSF Level 4. • RIIRIS501: “interprets and <i>analyses</i>” has been replaced with “interprets and <i>applies</i>”, consistent with ACSF Level 4. • RIIRIS501: The requirement has been updated to “reviews information from multiple sources to identify areas requiring improvement”, consistent with
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			ACSF Level 4 (removal of “evaluated system effectiveness and”). • RIIWHS301: “interprets and <i>analyses</i>” has been replaced with “<i>locates</i>, interprets and <i>applies</i>”, consistent with ACSF Level 4. • RIIRIS601 has not been updated as “interprets and critically evaluates” is consistent with ACSF Level 5 and the strategic governance of this role. The foundation skills outcomes charts in the related qualifications have been reviewed. • RII50926, RII50126: Diplomas in which RIIRIS402 or RIIRIS501 is core already present reading at Level 4 and have not required any change. • RII60226, RII60326, RII60826: Advanced Diplomas in which RIIRIS601 is core, present reading at Level 5, consistent with the current descriptor, and have not required any change. RIICOM301 has also been reviewed for consistency. Its reading descriptor doesn’t reference legislation; however, the reading descriptor still requires “interprets and <i>analyses</i>”. For consistency, the reading descriptor has been updated.
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			• “interprets and <i>analyses</i>” has been replaced with “interprets and <i>applies</i>”. It has been considered that this requirement relates to workplace procedures, reports, work information and documents, which aligns with ACSF Level 3. • RII40126: The qualification in which RIICOM301 is a core unit presents reading at Level 3 and has not required any change.
		In RIICOM301, the performance evidence requires “applying technical literacy and communication skills to interpret and apply common industry terminology”. Performance evidence specifies what individuals must do, but this item describes skills rather than a task, and “technical literacy” is not defined. Recommendation: The developer is asked to review this performance evidence item so that it describes the task to be demonstrated.	Response: The performance evidence in RIICOM301 has been updated to “<i>communicating work activity information using industry terminology appropriate to the audience and task</i>” to describe the task to be completed.

		The lead-in to the performance evidence differs across the revised units. RIIRIS501 and RIIRIS601 require the candidate to demonstrate the tasks outlined in the elements, performance criteria and foundation skills, while RIIRIS402, RIWHS301 and RIICOM301 refer only to the elements and performance criteria. This may lead RTOs to take different approaches to the assessment of foundation skills. Recommendation: The developer is asked to use a consistent lead-in to the performance evidence across the revised units.	Response: The lead-in sentence for the performance evidence has been amended in all units to: <i>“The candidate must demonstrate the ability to complete the tasks outlined in the elements, and performance criteria and foundation skills of this unit.”</i> Followed by <i>“The candidate must demonstrate...”</i> The lead-in sentence for the knowledge evidence has been amended in all units to: <i>“The candidate must be able to demonstrate the knowledge needed to complete the tasks outlined in the elements, performance criteria and foundation skills of this unit, including knowledge of.”</i>
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		Six of the qualifications include foundation skills outcomes in the bar chart format required by the TPOF. RII32226, RII41326, RIIS00031 and RIIS00032 are presented in the pre-TPOF template and do not include foundation skills outcomes, which is a mandatory field in the TPOF qualification and skill set templates. This, and the modification history, is consistent with a minor change.	
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 Consultation was undertaken through multiple stages, including a technical committee, workforce insights workshops, two rounds of public consultation, targeted consultation and an SRO check. Stakeholders included RTOs, employers, regulators, industry associations, unions and subject matter experts. Regional stakeholders were engaged through face-to-face workshops in Mackay and Perth, supplemented by online sessions, and respondents included a regional TAFE. The consultation log identifies six respondents as First Nations. The Technical Committee identified a need for Northern Territory input, although no feedback was received from the Northern Territory. 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 small business. The broad public consultation process provided open access for all interested parties to contribute. No discriminatory outcomes are evident in the training products.	Yes ☐ No ☒ NA

		Recommendation: It is recommended that future consultation strategies identify how the needs of vulnerable and minority cohorts will be considered.	This recommendation has been noted for inclusion in future consultation strategies.
4 Was the consultation feedback addressed?	TPOF Process Requirements and Quality Principles	Yes ☒ No ☐ NA The consultation log records feedback received at each stage of consultation, together with the developer's response. Responses are specific and, where feedback was not adopted, a rationale is provided. Changes made in response to feedback can be traced to the final units, for example the addition of escalation and stop-work requirements in RIIRIS402. Feedback on the positive duty under the Sex Discrimination Act and psychosocial safety was referred to a related project developing a unit on safe and respectful workplaces. A dispute raised by a stakeholder about critical control terminology and jurisdictional requirements is documented, including the steps taken to resolve it.	Yes ☐ No ☒ NA No action required.
5 Do the assessment requirements allow reasonable adjustments while maintaining integrity, ensuring that learners with disability can access and demonstrate competence on the same basis as others?	TPOF Product Requirements and Quality Principles, Disability Standards for Education 2005	Yes ☒ No ☐ NA The Companion Volume Implementation Guide provides comprehensive guidance on reasonable adjustment for learners with disability, including the distinction between inherent requirements and adjustable aspects of assessment. The CVIG Addendum advises RTOs to consider candidate welfare when simulating serious incidents and supports scheduling assessment around roster cycles. The revised units impose no health, fitness or physical	Yes ☒ No ☐ NA

		capacity requirements and competency is expressed in terms of workplace outcomes. Some requirements in RIICOM301 specify the mode of communication rather than the outcome to be achieved. The performance evidence requires the candidate to communicate by "speaking and communicating verbally" and electronically by telephone and radio. Where a mode of communication is specified, the scope for reasonable adjustment for learners with hearing or speech impairment is narrowed, unless that mode is an inherent requirement of the work.	
		Recommendation: The developer is asked to confirm whether verbal, telephone and radio communication are inherent requirements of RIICOM301.	Verbal communication and radio communication have been confirmed as inherent requirements for RIICOM301. Radio is a genuine sector-specific channel in these operational environments, and the ability to send and receive spoken information in real time is essential to safe work activity. Telephone and email form part of a deliberate electronic communication range against which the unit is assessed. <i>The Implementation Guide Addendum: Risk Management and Safety</i> has been updated to make the inherent communication requirements explicit so RTOs can advise candidates before enrolment and plan reasonable adjustments accordingly.

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 packaging rules are accessible to learners of any age.	Yes ☐ No ☒ NA No action required.
7 Are the training products free from direct or indirect disability discrimination? <i>For example, reasonable adjustments are possible, and essential versus adjustable tasks are clearly distinguished.</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 CVIG Addendum gives appropriate attention to psychosocial hazards and the welfare of candidates, including knowledge of the effects of post-traumatic stress in RIIWHS301 and guidance on the sensitive use of simulated incidents. Assessment conditions allow for reasonable adjustment while maintaining competency integrity and safety requirements.	Yes ☐ No ☒ NA No action required.
8 Do the training products use inclusive language? <i>For example, sector-appropriate terminology, person first language, and</i>	Sex Discrimination Act 1984, Disability Discrimination Act 1992, Disability	Yes ☒ No ☐ NA The training products use occupational, role-based language and contain no outdated or exclusionary terms relating to people, other than the gendered term noted at Q10. Terminology has been deliberately kept nationally applicable: jurisdiction-specific critical control	Yes ☐ No ☒ NA No action required.

<i>no outdated or exclusionary language.</i>	Standards for Education 2005, TPOF Product Requirements and Quality Principles	management terminology was removed from the units, and explicit job titles were replaced with descriptions of role and level of responsibility. The CVIG Addendum supports consistent interpretation across jurisdictions through a glossary of critical control management terms and a comparison of terminology used in each jurisdiction.	
9 Do the assessment requirements support learning and assessment on the same basis? <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>	Disability Standards for Education 2005, TPOF Product Requirements and Quality Principles	Yes ☒ No ☐ NA The assessment requirements are expressed in terms of workplace performance and do not preclude the use of accessible formats or assistive technology. The CVIG identifies interpreters, alternative formats and flexible scheduling as examples of support, and the CVIG Addendum supports scheduling work-based assessment around roster cycles. However, some performance and knowledge evidence items use wording that leaves unclear what must be demonstrated. RIICOM301 requires writing "using techniques such as dot points, subheadings, and simple language" and completing "a toolbox talk or similar workplace process". RIIRIS601 refers to capability-development strategies "such as" coaching and mentoring. RIIWHS301 requires evidence gathering "including but not limited to" six listed methods. This wording does not distinguish essential requirements from examples and may lead RTOs to interpret the requirements differently, so that learners are not assessed on the same basis. Recommendation:	Yes ☒ No ☐ NA Response:

		The developer is asked to review the performance and knowledge evidence so that it is clear which requirements are essential and remove advisory information.	• RIICOM301 has been amended to state “includes”. • RIIRIS601 has been amended to state “includes”. • RIWHS301 has been amended to state “using three of the following”.
		RIIRIS601 requires evidence of the ability to "establish and maintain the risk management system on at least two occasions". The Application describes the unit as covering establishing, maintaining or reviewing a system, and the CVIG Addendum advises that an existing system may be reviewed against the same criteria, but the performance evidence does not reflect this. As the unit requirements must be met regardless of the guidance, learners may be unable to generate sufficient evidence. Recommendation: The developer is asked to review the performance evidence in RIIRIS601 so that it is consistent with the Application.	Response: The Technical Committee has considered “review” and “<i>substantive improvement</i>” and advised that they fall within “<i>maintenance</i>” of the system. The Technical Committee has always intended this unit to be updated to “<i>establish, maintain or review</i>” specifically to address previous access barriers where candidates may have been working within an already established system. The performance evidence lead-in sentence for RIIRIS601 has been amended from “<i>establish and maintain</i>” to “<i>establish,</i>

			<i>maintain or review</i> ", aligning it with the unit's application statement, elements, performance criteria, performance evidence and knowledge evidence.
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</i>	Sex Discrimination Act 1984	Yes ☒ No ☐ NA The revised units and the qualification and skill set descriptions use gender-neutral, role-based language, with one exception. The qualification description for RII32226 refers to "derrickmen". No requirements relating to sex, gender identity, relationship status, pregnancy or breastfeeding were identified, and the CVIG Addendum supports scheduling assessment around roster cycles, which assists learners with caring responsibilities.	Yes ☒ No ☐ NA

<i>status; no restrictions or disadvantage relating to marital/relationship status, pregnancy, or breastfeeding; and flexible assessment requirements to enable full participation.</i>		Recommendation: The developer is asked to use gender-neutral language in the qualification description for RII32226	In RII32226, the term “<i>derrickmen</i>” has been replaced with the industry gender neutral term “<i>derrickhands</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 in the terminology, examples or contexts of the training products. Cultural inclusion is supported through the inclusion of RIILAT402E Provide leadership in the supervision of diverse work teams as an elective across the Release 1 qualifications, and the CVIG Addendum identifies the protection of cultural heritage as a consideration in ground disturbance work.	Yes ☐ No ☒ NA No action required.
12 Do the training products respect broader human rights and diversity, including protection from discrimination on the	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	Yes ☐ No ☒ NA No action required.

basis of religion, political opinion, national extraction, or social origin? <i>For example, no indirect exclusion through cultural or religious requirements, and products are respectful of diversity.</i>		religious requirements. The products are respectful of diversity.	
13 Does the Companion Volume Implementation Guide include access and equity guidance?	TPOF Template Requirements, Product Requirements and Quality Principles	Yes ☒ No ☐ NA The Companion Volume Implementation Guide includes access and equity guidance addressing the individual support needs of learners, including those relating to age, gender, cultural background, disability, language, literacy and numeracy, and geographical location. It outlines RTO obligations to learners with disability under the Standards for RTOs 2025, the Disability Discrimination Act 1992 and the Disability Standards for Education 2005, and provides guidance on reasonable adjustment and inherent requirements, with examples and additional resources. The CVIG Addendum refers RTOs to this guidance and supplements it with sector-specific delivery considerations.	Yes ☒ No ☐ NA

		Recommendation: The developer is asked to review the examples in the regional and remote delivery guidance so that they reflect the industries covered by the RII Training Package.	Response: The examples in the "<i>Regional and Remote Delivery Considerations</i>" section of the <i>RII Companion Volume Implementation Guide</i> have been updated to reflect the industries covered by the RII Training Package. This included the removal of "<i>agriculture, mobile plant, or community fleet operations</i>" which has been replaced with "<i>mine sites, quarries, drilling operations or civil construction and infrastructure projects</i>".
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