

Anti-Discrimination Assessment

Activity

Activity ID	MAS_ANN_2425_004
Activity title	Advanced Driver Assistance Systems

Scope

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

Qualifications	Nil
Skill sets	One skill set: AURSS00066 Advanced Driver Assistance Systems (ADAS) Skill Set
Units of competency	Four units of competency: AURETR052 Apply knowledge of advanced driver assistance systems (ADAS) AURETR249 Scan and calibrate advanced driver assistance systems (ADAS) AURETR054 Diagnose and repair advanced driver assistance systems (ADAS) and components in vehicles AURETR053 Apply awareness of advanced rider assistance systems (ARAS)
Companion Volume Implementation Guide	Mapping tables provided

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	<p>Tina Berghella has over 25 years of experience working as an independent consultant in the VET sector.</p> <p>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.</p> <p>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.</p> <p>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.</p>
Signature	Tina Berghella
Date	27/03/2026

Assessment checklist

Item	Reference	Assessor comments and recommendations <small>Detail evidence identified, recommendations made and how those recommendations were addressed</small>	Developer response to assessor
<p>1 Do the training products support access?</p> <p><i>For example, multiple entry/exit points, minimal prerequisites, flexible packaging rules and no location restrictions.</i></p>	<p>TPOF Product Requirements and Quality Principles</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p>Of the four units of competency, one unit (AURETR054 Diagnose and repair advanced driver assistance systems (ADAS) and components in vehicles) includes a prerequisite: AURETR249 Scan and calibrate advanced driver assistance systems (ADAS). This prerequisite is reasonable and appropriate, as it ensures individuals have foundational scanning and calibration skills before undertaking more complex diagnosis and repair work.</p> <p>The ADAS Skill Set (AURSS00066) includes entry requirements specifying completion of one of five Certificate III qualifications or equivalent. The multiple options and inclusion of “or equivalent” pathways provides flexibility and supports access for learners with relevant prior experience or qualifications from other training packages.</p> <p>The assessment conditions across all units allow for competency to be demonstrated in either a real workplace or a simulated</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>

		<p>environment that accurately reflects workplace performance. This supports flexible delivery and removes location-based barriers to access.</p>	
<p>2 Are the foundation skills explicit and free from unnecessary literacy, numeracy, or digital barriers?</p>	<p>TPOF Product Requirements and Quality Principles</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p>The foundation skills fields across the units are generally well-articulated and appropriately scoped. The skill set appropriately includes a foundation skills outcomes chart and a reference to digital literacy skills, which supports transparent communication of skill demands to users. However, the following observations are noted.</p> <p>In several units, foundation skills statements duplicate skills that are already explicit in the performance criteria, such as interpreting manufacturer specifications and completing documentation. The duplication can be removed.</p> <p>Several units include references to "manufacturer specifications" and related documentation in the knowledge evidence. However, the foundation skills field in these units also requires learners to locate (Learning) and interpret (Reading) such information. This creates ambiguity about whether knowledge of manufacturer specifications and related documentation is intended to be recalled from memory or</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p>In AURETR249, all FS that are explicit in the PC have been removed</p> <p>Updated relevant KE requirement to "methods to locate and interpret manufacturer specifications, Australian Design Rules, and technical data related to ADAS". Added methods to locate and interpret to ensure clarity that requirement is access, not to memorise. This is applied to all four units.</p>

	<p>accessed and applied at the point of need. If it is required to be known, the type and depth of that knowledge is not specified. This ambiguity makes the literacy and knowledge demands of the units unclear. Recommendation: It is recommended that the developer clarify whether references to manufacturer specifications and other documents in the knowledge evidence are intended to be recalled or accessed at the point of need, and specify the type and depth of knowledge required.</p>	
	<p>The performance evidence in some units requires candidates to "explain" component functionality and system operation, and the application statements of some units use "describe" in relation to ADAS/ARAS function and purpose. Neither demand is consistently reflected in the performance criteria or foundation skills fields, which creates an internal consistency issue. It is also not clear whether these demands reflect workplace tasks or learning and assessment tasks — are "explaining" and "describing" tasks typically performed in the workplace contexts? Recommendation: It is recommended that the use of "explain" and "describe" across the application statements, performance criteria, performance evidence, and foundation</p>	<p>Removed from PE and included into the KE</p>

		<p>skills fields be reviewed to ensure these demands are internally consistent and clearly grounded in workplace requirements.</p>	
		<p>AURETR052 includes an element titled "Demonstrate knowledge of ADAS components." This is a cognitive process that is not clearly demonstrable or assessable. The associated performance criteria for this element (and a similar element in AURETR053) could be misinterpreted as learning and assessment tasks designed to collect knowledge evidence rather than observable workplace performance. It is also noted that the language used in the unit title and in Element 2 differs between AURETR052 and AURETR053. It is not clear why these differ or how users should interpret the distinction, if any is intended. Where these demands go beyond what is required in the workplace, they may collectively impose undue literacy demands on learners. Recommendation: It is recommended that the framing of the "Demonstrate knowledge of" element in AURETR052 and the "Apply knowledge of" element in AURETR053 be reconsidered, and that it be clarified whether the difference in language between these two</p>	<p>No change to title. AURETR053 – the relevant element updated to: Identify the function and operation of ARAS components AURETR052 – the relevant element has been updated to: Identify the function and operation of ADAS components</p>

		<p>units is intentional and, if so, what distinction is intended.</p>	
		<p>The knowledge evidence in AURETR052 includes the statement "identify when ADAS must be calibrated or repaired by an authorised repairer or dealer." This is phrased as a performance verb ("identify") rather than as a knowledge statement, which is inconsistent with the purpose of the knowledge evidence field. Recommendation: It is recommended that this statement be reframed as a knowledge statement — for example, "circumstances in which ADAS must be calibrated or repaired by an authorised repairer or dealer."</p>	<p>KE updated as suggested</p>
		<p>The foundation skills field in AURETR052 includes oral communication skills — "clarifies instructions" and "obtains information from customers and supervisors." However, no performance criterion explicitly requires candidates to communicate orally with customers. PC 3.2 refers to "report identified hazards and safety risks" but it is not clear whether this reporting is intended to be written or oral. Recommendation: It is recommended that the oral communication statements in AURETR052 be reviewed and that PC 3.2 be clarified to indicate whether reporting is</p>	

		<p>written or oral, to ensure foundation skills are clear.</p>	
		<p>The use of "or" across multiple units creates ambiguity about requirements in several places. For example, in performance evidence specifications, the use of "a camera or radar single-sensor system" leaves it unclear whether candidates must demonstrate competence with both system types or only one. Similar ambiguity arises elsewhere across the units where "or" is used in contexts that may be intended to be inclusive rather than offering a choice. This may lead to inconsistent assessment decisions and potentially disadvantage some learners. Recommendation: It is recommended that all instances of "or" across the units be reviewed to clarify whether each instance is intended to offer a choice or to be read inclusively, and rewording where necessary to ensure assessment requirements are unambiguous.</p>	<p>Or is used in the PE of some units, for example in AURETR052 Knowledge to provide RTOs flexibility with their assessment. For example, "a camera or radar single-sensor system" is written as RTOs can use either system in their assessment. No change required.</p>
		<p>The Element 3 title in AURETR052 refers to "incorrect understanding or handling of ADAS," and PC 3.1 repeats the reference to "incorrect understanding." While "incorrect handling" describes an observable workplace behaviour, "incorrect understanding" is a cognitive state that is neither observable nor directly assessable.</p>	<p>PC 3.1 updated to Identify safety risks arising from failure to conduct required ADAS checks, scans, or calibrations prior to, during, or following modifications, repairs, or replacements made to the vehicle</p>

		<p>This creates an internal consistency issue and may make it unclear what candidates are required to demonstrate.</p> <p>Recommendation: It is recommended that references to "incorrect understanding" be replaced with language that describes observable workplace behaviours or outcomes.</p>	
		<p>Several units use the term "basic" in the numeracy specifications within the foundation skills field — for example, "uses basic numerical information" and "uses basic mathematical operations." There is no commonly understood or standardised definition of "basic" in this context, which means the level of numeracy demand may be interpreted inconsistently, potentially disadvantaging some learners.</p> <p>Recommendation: It is recommended that the term "basic" in numeracy specifications be replaced with more precise language that clearly communicates the level and type of numeracy demand.</p>	<p>AURETR052, AURETR053 – FS updated to Uses numerical data from manufacturer specifications relating to ADAS components and systems</p> <p>Removed basic from AURETR249</p>
<p>3 Did the consultation include vulnerable and minority cohorts, such as women, people with disability, CALD, First Nations,</p>	<p>TPOF Process Requirements and Quality Principles</p>	<p>The consultation strategy identifies a broad range of stakeholder groups, including industry associations, peak bodies, employers of varying sizes, RTOs, unions, state and territory government officials, and regulators. Consultation was conducted across all states and territories and was open to all interested parties.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>

<p>regional and remote communities, and small business.</p>		<p>Small businesses are well represented in both the consultation log and the TAG. Unions were identified as key stakeholders, with the AMWU and ETU listed as SWAP members. Regional perspectives are represented through regional stakeholders.</p> <p>There is no evidence in the consultation log that consultation was specifically targeted at women, people with disability, CALD communities, or First Nations peoples. However, the broad public consultation process provided open access for all interested parties to contribute, and no discriminatory outcomes are evident in the training products.</p>	
<p>4 Was the consultation feedback addressed?</p>	<p>TPOF Process Requirements and Quality Principles</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p>The consultation log records feedback from the public and government consultation, with each item assigned an action status and a documented developer response explaining the rationale for the decision taken. This provides a clear and transparent record of how feedback was considered. The engagement activities log records five dedicated post-consultation TAG meetings in which feedback was reviewed unit by unit, providing evidence that the process was systematic and thorough.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>

<p>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?</p>	<p>TPOF Product Requirements and Quality Principles, Disability Standards for Education 2005</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p>The assessment conditions across all units allow for competency to be demonstrated in either a real workplace or a simulated environment, providing flexibility for reasonable adjustments. Multiple evidence-gathering options are available, including direct observation, third-party evidence, and assessor questioning, supporting flexible assessment arrangements without compromising integrity.</p> <p>No assessment conditions were identified that would unreasonably restrict access for learners with disability or prevent reasonable adjustment.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>
<p>6 Are the training products free from direct and indirect age discrimination?</p> <p><i>For example, no ageist assumptions, competence is not tied to age, and packaging rules are accessible to all ages.</i></p>	<p>Age Discrimination Act 2004</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p>No age-based assumptions, restrictions or references were identified. Competency is performance-based and not linked to age.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>

<p>7 Are the training products free from direct or indirect disability discrimination?</p> <p><i>For example, reasonable adjustments are possible, and essential versus adjustable tasks are clearly distinguished.</i></p>	<p>Disability Discrimination Act 1992</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p>No additional or unnecessary exclusionary criteria were identified. Assessment conditions allow reasonable adjustment while maintaining competency integrity and safety requirements.</p> <p>No direct or indirect disability discrimination risks were identified.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>
<p>8 Do the training products use inclusive language?</p> <p><i>For example, sector-appropriate terminology, person first language, and no outdated or exclusionary language.</i></p>	<p>Sex Discrimination Act 1984, Disability Discrimination Act 1992, Disability Standards for Education 2005, TPOF Product Requirements and Quality Principles</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p>Language across the qualifications and units is gender-neutral and sector-appropriate. No exclusionary or outdated terminology was identified.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>
<p>9 Do the assessment requirements support learning and</p>	<p>Disability Standards for Education 2005, TPOF Product</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p>Assessment requirements allow learners to demonstrate competence on the same</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>

<p>assessment on the same basis?</p> <p><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></p>	<p>Requirements and Quality Principles</p>	<p>basis as others, subject to inherent occupational requirements.</p> <p>Simulation provisions and flexibility in assessment environments support equitable implementation.</p>	
<p>10 Are the training products free from gender bias, stereotypes, or barriers?</p> <p><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 marital/relationship</i></p>	<p>Sex Discrimination Act 1984</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p>The training products do not impose barriers related to sex, gender identity, pregnancy, relationship status or caregiving responsibilities.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>

<p><i>status, pregnancy, or breastfeeding; and flexible assessment requirements to enable full participation.</i></p>			
<p>11 Are the training products free from racial and cultural bias, and culturally inclusive?</p> <p><i>For example, inclusive cultural terminology and no bias in examples or contexts.</i></p>	<p>Racial Discrimination Act 1975</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p>No racial or cultural bias was identified. The qualifications and units are occupationally focused and do not embed culturally exclusive assumptions.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>
<p>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?</p>	<p>Australian Human Rights Commission Act 1986</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p>No provisions were identified that would disadvantage individuals on the basis of religion, political opinion, national extraction or social origin</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>

<p><i>For example, no indirect exclusion through cultural or religious requirements, and products are respectful of diversity.</i></p>			
<p>13 Does the Companion Volume Implementation Guide include access and equity guidance?</p>	<p>TPOF Template Requirements, Product Requirements and Quality Principles</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p>While the updated CVIG was not sighted for this review, the existing CVIG includes guidance on access and equity, including disability and reasonable adjustment.</p> <p>The guidance supports equitable participation while maintaining the integrity of the training products.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>