

Anti-Discrimination Assessment

Activity

Activity ID	MAA_ANN_2324_002
Activity title	Review and update of the RII emergency response qualifications

Scope

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

Qualifications	6 revised qualifications: RII30126 Certificate III in Surface Extraction Operations RII30226 Certificate III in Underground Coal Operations RII30326 Certificate III in Underground Metalliferous Mining RII30426 Certificate III in Resource Processing RII30726 Certificate III in Emergency Response and Rescue RII41326 Certificate IV in Emergency Response Coordination
Skill sets	2 revised skill sets: RIISS00033 Underground Mine Safety Skill Set RIISS00034 Surface Mine Safety Skill Set
Units of competency	5 revised units of competency: RIIRIS301 Apply risk management processes RIIERR201 Conduct fire team operations RIIERR305 Control underground fires RIIERR307 Extricate casualties from underground incidents RIIERR308 Extricate and transport people involved in incidents 1 new unit of competency: RIIERR312 Respond to incidents involving energy storage systems
Companion Volume Implementation Guide	Mapping document and CVIG information


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	
Date	9/04/26

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
<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>✓ Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p>Of the five Certificate III qualifications reviewed, four — RII30126, RII30326, RII30426, and RII30726 — have nil entry requirements, supporting open access. RII30226 carries formal entry requirements comprising nine units of competency that must be completed prior to enrolment. These reflect the hazardous nature of underground coal operations, are expressed in terms of competency as required by the TPOF, and are accompanied by a rationale in the CVIG.</p> <p>All five Certificate III qualifications offer flexible packaging structures. RII30226 and RII30326 provide multiple specialisation streams, and elective banks across the Certificate IIIs are broad.</p> <p>A new entry requirement has been introduced for RII41326 Certificate IV in Emergency Response Coordination: “This qualification is limited to those who have completed RII30726 Certificate III in Emergency Response and Rescue, or equivalent.”</p> <p>The inclusion of an “or equivalent” entry pathway provides flexibility. However, as there is no formally equivalent predecessor qualification to RII30726, holders of superseded qualifications would not</p>	<p>✓ Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p>Consideration was not given to listing RII30719 as an alternative entry pathway primarily due to the additional inclusion of Breathing Apparatus Group electives in RII30726 and rendering superseded versions not equivalent to current industry requirements nationally. Credit transfer could be granted for individual units of competency into RII30726 as an alternative entry pathway.</p> <p>No change required.</p>

		<p>access the Certificate IV through credit transfer and would instead require recognition of prior learning.</p> <p>The developer was asked whether consideration had been given to explicitly listing superseded versions of the Certificate III as alternative entry pathways. The developer advised that this was not considered appropriate because RII30726 includes additional breathing apparatus electives that are not present in the superseded qualification, meaning the qualifications are not considered equivalent to current national industry requirements. However, credit transfer for individual units completed as part of RII30719 may be applied towards RII30726.</p> <p>No entry requirements have been added to the revised skill sets.</p> <p>In both skill sets RIIERR205D Apply initial response First Aid has been replaced with HLTAID011 Provide First Aid. The inclusion of HLTAID011 increases portability and recognition across sectors and supports credit transfer for learners who have already completed the standard first aid unit. This reduces unnecessary duplication and enhances access by aligning with nationally recognised first aid outcomes rather than sector-specific variants.</p> <p>No additional pre-requisites have been introduced at unit level. Packaging flexibility within the Certificate IIIs has been maintained.</p>	
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		Assessment conditions permit simulation where safety or environmental constraints limit live workplace assessment, supporting access while maintaining integrity and safety.	
2 Are the foundation skills explicit and free from unnecessary literacy, numeracy, or digital barriers?	TPOF Product Requirements and Quality Principles	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p>Due to the timing of the project, the qualifications are submitted using the pre-TPOF template, which does not include a foundation skills field.</p> <p>Foundation skills are explicitly identified within the revised and new units of competency.</p> <p>Foundation skills requirements generally reflect authentic workplace demands within emergency response environments.</p> <p>The developer was asked whether numeracy skills were sufficiently explicit. In some units, numeracy requirements appear to be implied within the knowledge evidence (for example, monitoring atmospheric conditions or interpreting plans) but are not explicit in the performance criteria or foundation skills field. Making these numeracy requirements explicit was recommended to support clarity and consistent interpretation. The developer noted this feedback and advised that the foundation skills within the revised units would be reviewed prior to submission.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p>The foundation skills of unit RIIERR312 <i>Respond to incidents involving energy storage systems</i> have been updated to include numeracy. The description now reads: interprets data relating to weather and atmospheric conditions</p>
3 Did the consultation include vulnerable and	TPOF Process Requirements and Quality Principles	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</p> <p>Consultation documentation demonstrates engagement with relevant emergency response</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>

<p>minority cohorts, such as women, people with disability, CALD, First Nations, regional and remote communities, and small business.</p>		<p>industry representatives consistent with Training Package requirements.</p> <p>No feedback was received identifying adverse impact on vulnerable or minority cohorts. The changes made through this review do not introduce new barriers affecting specific groups.</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 and summary of changes demonstrate that feedback was considered and incorporated where appropriate.</p> <p>No unresolved access or equity concerns were identified.</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 on</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>There are no barriers to reasonable adjustment.</p> <p>Advice on reasonable adjustment is included in the companion volume implementation guide.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>

<p><i>the same basis as others?</i></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</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><i>are clearly distinguished.</i></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 assessment on the same basis?</p> <p><i>For example, work placements and work-based activities are inclusive, accessible formats</i></p>	<p>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>Assessment requirements allow learners to demonstrate competence on the same basis as others, subject to inherent occupational requirements.</p> <p>Simulation provisions and flexibility in assessment environments support equitable implementation.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>

<p><i>(such as Auslan and assistive technology) are possible, and there are no undue disadvantages.</i></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 status, pregnancy, or breastfeeding; and flexible</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>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>The CVIG includes comprehensive 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>