

# Hopkins Policy and Procedures Manual

## Diversity, Inclusion, Anti-Vilification and Wellbeing Policy and Procedure

### Policy

This policy ensures Hopkins International College (Hopkins) provides a safe, inclusive and respectful learning environment free from discrimination, harassment and vilification, while actively protecting student wellbeing. The policy demonstrates compliance with Outcome Standard 2.5 (Diversity and Inclusion) and Outcome Standard 2.6 (Wellbeing). Hopkins will ensure services offered are provided in a fair and equitable manner to all clients, free from bias.

The purpose of this Policy is to provide a frame of reference in providing and maintaining training services that reflect fair and reasonable opportunity for all clients, regardless of their diversity, allowing individuals to freely participate in the learning environment free from discrimination, harassment, bullying and vilification.

This policy applies to all students (including overseas students), staff, trainers, assessors, contractors and visitors across all delivery modes including on-campus, online, blended and off-site learning activities.

### 1. Definitions

**Access and equity** approaches aimed at ensuring that VET is responsive to the individual needs of clients whose age, gender, cultural or ethnic background, disability, sexuality, language skills, literacy or numeracy level, unemployment, imprisonment or remote location may present a barrier to access, participation and the achievement of suitable outcomes.

**Discrimination** occurs when a person is treated less favourably than others due to the person's circumstances, characteristics or beliefs.

**Access and Equity** Strategies that ensure fair access to education regardless of personal characteristics.

**Vilification** Conduct that incites hatred, serious contempt or severe ridicule of a person or group based on race or religion.

**Wellbeing** The physical, psychological, emotional, cultural and social safety of students.

### 2. Policy Statement

Hopkins International College is committed to respecting and valuing diversity. The College adopts a zero-tolerance approach to discrimination and vilification based on race or religion, including antisemitism, Islamophobia, or hostility toward any religious or belief group. This applies across all physical, digital and work-based learning environments.

Hopkins will ensure:

- a) all training and assessment policies and procedures incorporate access and equity principles;

- b) all learners have equitable access to the benefits of training and assessment irrespective of their gender, age, race, religion, culture, linguistic background, marital status, geographic location, socio-economic background, disability, sexual preference, family responsibility or political conviction;
- c) all nominations and enrolments into training courses and programs will be conducted at all times in an ethical and responsible manner, ensuring fairness and compliance with Equal Opportunity legislation; and
- d) all learners/clients have equitable access to training resources, facilities, equipment, support services, information, training and assessment personnel, materials, assessment opportunities, and training opportunities.
- e) Each student has access to the level of support required to enable them to reach their full potential without causing unjustifiable hardship to the organisation
- f) Students have the right to learn in an environment free from discrimination and vilification. Students are responsible for respecting diversity, complying with the Student Code of Conduct, and refraining from behaviour that may cause harm or distress to others.

### **3. Policy Principles**

Hopkins will not accept any form of discrimination, and we will apply the following principles in support of access and equity:

#### **3.1 Access and Equity Principles**

- a) Hopkins abides by access and equity principles.
- b) Hopkins will respect a client's right to privacy, confidentiality and be sensitive to client needs.
- c) Hopkins provides equal opportunity for all learners and is responsive to the individual needs of clients whose gender, pregnancy, race, marital status, sexuality, age, family/carer responsibilities, disability, transgender, political conviction, cultural or ethnic background, linguistic background, religious belief, geographic location, socio-economic background, employment/unemployment, imprisonment may present a barrier to access, participation and achievement of suitable outcomes.
- d) The College provides structured wellbeing and welfare services including compulsory orientation, Pre-Training Review, access to Student Support Officers, academic support, counselling and community referrals, and emergency or critical incident support. Services are culturally appropriate and accessible to overseas students.
- e) At enrolment, clients will be asked to identify personal needs or circumstances that may exist and for which they may require additional support (See Enrolment Policy).
- f) Hopkins will ensure that all staff, employees, and contractors have access to the information and support needed to prevent discrimination, sexual harassment, bullying and violence, victimization, and vilification or to deal with it appropriately if it occurs.
- g) Hopkins seeks to create a learning environment where all students are respected and can develop their full potential.
- h) All clients are given fair and reasonable opportunity to attend and complete training.
- i) All staff are given fair and reasonable opportunity to participate in relevant decision-making processes and the allocation of resources and services as required to fulfil their duties and responsibilities.

- j) Deficiencies will be investigated to determine whether a breach or policy deficiency exists. Should a discrepancy be proven, the impact of that breach or deficiency will be identified along with how the policy should be amended to eliminate the breach or deficiency in the future.
- k) All perceived deficiencies in the Access and Equity Policy are to be documented, assessed and reviewed by the Executive Director.
- l) Hopkins will demonstrate its commitment by:
  - i. Selecting students according to a fair and non-discriminatory process
  - ii. Making its training relevant for a diverse student population
  - iii. Providing suitable access to facilities and resources
  - iv. Providing appropriate support services
  - v. Providing appropriate complaints procedures
  - vi. Consulting with relevant industry groups
  - vii. Raising staff, contractor and student awareness of equity issues.

### **Social Media and Online Conduct**

Students are expected to use social media and online platforms responsibly. When communicating or posting online, always show respect toward trainers, fellow students, and the RTO. Avoid sharing confidential information, offensive or vilifying content, or anything that could damage the reputation of others or the RTO.

The same standards of professionalism and courtesy that apply in the classroom apply online including obligations under vilification legislation. Misuse of social media may result in disciplinary action, including but not limited to legal consequences.

### **3.2 Equal Opportunity**

Hopkins is an equal opportunity company and does not discriminate against or favour target groups in either recruiting or training, unless prescribed by funding contracts. The College ensures equitable access to training and assessment for all students regardless of race, religion, cultural background or belief. Inclusive practices are embedded across enrolment, orientation, learning delivery and assessment. Students are informed of their rights and responsibilities through orientation and the Student Handbook.

Target Groups are defined as:

- International students
- Aboriginal and Torres Strait Islanders;
- People with a disability;
- People from non-English speaking backgrounds;
- People in transition and other special groups (i.e. people re-entering the workforce, long term unemployed, sole parents, people with literacy problems, and those who have been institutionalised).
- People from regionally isolated communities.

### **3.3 Special Needs/Considerations**

- a) Potential students intending to enrol with Hopkins are advised to notify Hopkins of any disability, physical or other impairment which may adversely affect their ability to successfully undertake training and assessment.

- b) Clients are encouraged to discuss any 'special needs' so that where possible 'reasonable adjustments' to the study environment may be considered to assist them in the performance of their studies.
- c) Hopkins in collaboration with the intending student, will assess the potential to successfully complete the training which may include flexible delivery options to optimise the ease and benefit of the Clients' learning. However, no compromise to the integrity of the assessment against competency will be allowed.
- d) Intending students with a disability are required to have the ability to fulfil the requirements of the units of competency to attain the relevant award. However, it is recognised that flexibility in arrangements may need to be implemented.

### **3.4 Harassment**

- a) Harassment will not be tolerated at Hopkins. If harassment occurs, the person responsible will be subject to disciplinary procedures. Disciplinary action will be taken against any staff or client involved in such behaviour. This may include termination of employment and removal of the client from the training course.
- b) Serious cases of harassment may constitute a criminal offence.
- c) Hopkins will not tolerate behaviour which is considered to be sexual harassment and expects all staff, contractors and clients to treat each other with dignity and respect.

### **3.5 Bullying and Violence**

- a) Hopkins will not tolerate bullying or violent behaviour and expects all staff, contractors and clients to treat each other with dignity and respect.
- b) Hopkins recognises bullying and violence demeans and infringes the rights of individuals and groups, damaging the work and learning environment.

### **3.6 Vilification**

- a) Hopkins will not tolerate behaviour which vilifies another person and expects all staff, contractors and clients to treat each other with dignity and respect.
- b) Vilification of any racial or religious group is strictly prohibited. This includes conduct occurring in classrooms, online learning environments, College-related social media, and work-based learning contexts. Allegations are addressed promptly through complaints and disciplinary procedures.
- c) It goes beyond expressing an opinion and promotes hostility toward people based on who they are. Serious vilification is a criminal offence in most Australian states and territories

### **3.7 Complaints**

Students may raise concerns through trainers, Student Support Officers or the formal Complaints and Appeals process. All complaints are managed confidentially, fairly and without victimisation, in accordance with procedural fairness.

- a) Hopkins encourages informal resolutions of discrimination, sexual harassment, bullying and violence, victimisation, and vilification grievances in the first instance, as close to the source as possible, with the option of conciliation or investigation of the complaint if necessary.
- b) Complaints will be investigated in line with Hopkins's complaints and appeals policy and procedure.
- c) Those responsible for advising, conciliating or investigating a complaint must act fairly and impartially, they must act without bias and avoid any conflict of interest the

respondent must be given a fair opportunity to know the case against him or her and to be given the opportunity to make a considered response.

- d) All staff, clients and contractors involved with the Hopkins complaint procedures will be treated with respect and courtesy. Enquiries and complaints will be dealt with in a sensitive, equitable, fair, and confidential manner. All attempts will be made to deal with matters expeditiously while ensuring all parties are provided with sufficient time to prepare and or respond.
- e) Hopkins acknowledges that it is of paramount importance and in the best interests of all parties that confidentiality is maintained during these procedures.
- f) Hopkins encourages the reporting of behaviour that breaches equal opportunity policy but will not tolerate vexatious or frivolous complaints.

### **3.8 Victimisation**

- a) In order for complaints to be brought forward, complainants must feel secure in the knowledge that the Hopkins's procedures will be followed without fear of reprisal.
- b) Hopkins will not victimise or treat any person unfairly for making a harassment complaint.
- c) Hopkins will not tolerate behaviour of victimisation of another person and expects all staff, contractors and clients to treat each other with dignity and respect.
- d) Any complaint of victimisation will be treated in the same manner as a complaint of discrimination, sexual harassment or vilification.

## **4. Hopkins Responsibilities**

Hopkins has a legal and moral obligation to provide equal opportunity in an environment free from discrimination for staff, contractors and clients to ensure that discrimination/harassment does not occur in the workplace.

Hopkins will:

- Maintain policies and procedures for equal opportunities for all staff, contractors and clients;
- Disseminate policies and procedures to staff, contractors and clients;
- Examine all policies and practices, as they affect staff, contractors and clients to ensure the elimination of discrimination and harassment;
- Ensure that there is no discrimination against any individual client or group of clients or staff, in access to facilities, products and services;
- Educate staff and contractors on the general goals and philosophy of equal opportunity together with the rationale for policies and practices which are adopted;
- Eliminate sexist and other discriminator language from all publications and discourage the use of such language in all printed material and in the speech of its staff, contractors and clients;
- Establish and maintain mechanisms to deal with complaints.
- Breaches of this policy, including discriminatory or vilifying behaviour, may result in disciplinary action such as warnings, suspension or cancellation of enrolment, depending on severity and risk to wellbeing.

### **4.1 Responsibilities**

The Executive Director and Director RTO Management & Corporate Services, along with the Managers, are responsible for implementation and compliance. Staff must model inclusive behaviour and respond appropriately to concerns. Students are expected to uphold respectful conduct at all times.

## **4.2 Staff, Contractors and Clients Responsibilities**

Hopkins staff, contractors and clients have the responsibility to:

- Act to prevent harassment, discrimination and victimisation against others.
- Respect differences among other staff, clients and contractors, such as cultural and social diversity;
- Treat people fairly, without discrimination, harassment or victimisation.
- Respect the rights of others;
- Respect people's rights to privacy and confidentiality;
- Refuse to join in with these behaviours;
- Supporting the person in saying no to these behaviours;
- Acting as a witness if the person being harassed decides to lodge a complaint;
- Observe site rules or behaviour guidelines set by Hopkins Trainers/Assessors.
- Behave in a manner that does not interfere with the learning of others; and
- Conduct themselves in a responsible manner while in training;
- Ensure the rights of all clients to have their say, balanced with the responsibility to listen to others and allow others to have their say.

If a Hopkins staff, contractor or client feels harassed, bullied or otherwise a victim of unwelcome behaviour, the staff, contractor or client is encouraged to inform the person where the behaviour is unwanted, unacceptable and/or offensive. If the staff, contractor or client feels unable to approach the person, or if the behaviour continues following their request that the behaviour cease, the Director Hopkins should be contacted.

Information relating to student wellbeing, discrimination or complaints is managed confidentially and stored securely, subject to legal reporting obligations and duty of care requirements.

### **Disciplinary Action**

We provide our training services in an environment of mutual respect and cooperation.

If a student exhibits disrespectful or disruptive behaviour, then the Trainer/Assessor has the authority to warn the student that their behaviour is unsuitable. If there is no improvement or the immediate safety or well-being of others is at risk, then the student should be directed to leave the training environment.

Examples of when disciplinary action may be required include when a student:

- Brings or consumes illegal drugs or alcohol on the premises
- Is under the influence of drugs or alcohol
- Damages property or removes property or resources belonging to the training venue.
- Assaults (physically or verbally) any person or persons on the training or business premises
- Fails to comply with any instructions relating to the safety of anyone on the premises
- Exhibits aggressive, disorderly, disruptive, harassing or vilifying behaviour or interferes with the comfort, safety or well-being of any person who is acting lawfully and entitled to be present.
- Applies conversion practices.
- Colludes, plagiarises or cheats in assignments or assessments.
- Enters any part of the training or business premises when not entitled to do so, or having entered, refuses to leave the premises.

## 5. Legislation

This policy reflects our commitment to the following legislation:

- Equal Opportunity Act 1984 (WA)
- Criminal Code Act Compilation Act 1913 (WA) – sections 77–80B (racial vilification offences)
- Racial Discrimination Act 1975 (Cth)
- National Vocational Education and Training Regulator Act 2011 (Cth)
- Education Services for Overseas Students Act 2000 and National Code of Practice

### Document control

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<b>Review date</b>	July 2029
<b>Author</b>	Director, RTO Management
<b>Approved</b>	Executive Director

Feedback and enquiries relating to this policy may be directed to [info@hopkins.edu.au](mailto:info@hopkins.edu.au). This document can be available in alternative formats on request.

### Amendments

Version	Date	Author	Description
1	15 May 2022	Lincoln Islam	Policy Developed
2	31 March 2026	Lincoln Islam	Policy updated to include antisemitism islamophobia and other religious discrimination issues.

# ASQA & CRICOS Compliance Mapping Table

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This mapping table demonstrates how Hopkins International College meets the requirements of the 2025 Standards for Registered Training Organisations (RTOs) and the Education Services for Overseas Students (ESOS) framework, with specific reference to diversity, inclusion, student wellbeing and protection from racial and religious vilification.

Standard / Legislative Requirement	Requirement Summary	Policy Evidence (Master Policy Sections)	Implementation Evidence
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Outcome Standard 2.5 – Diversity and Inclusion (ASQA)	Provider ensures inclusive practices, equitable access, and protection from discrimination and vilification.	Sections 6, 7, 8 – Diversity and Inclusion; Protection from Vilification; Student Rights and Responsibilities	Access and equity principles, zero-tolerance policy on race and religion-based vilification, behavioural expectations communicated at orientation.
Outcome Standard 2.6 – Wellbeing (ASQA)	Provider actively supports student physical, psychological and social wellbeing.	Sections 9, 10 – Student Wellbeing and Support Services; Complaints and Reporting	Student Support Officers, counselling and welfare referrals, critical incident procedures, ongoing monitoring of engagement.
ESOS Act s19 & National Code Standard 6 (Student Support)	Provider must offer welfare, safety and support services tailored to overseas students.	Sections 6, 9 – Diversity and Inclusion; Student Wellbeing and Welfare	Compulsory orientation, culturally appropriate support, referral services, emergency contact procedures.
National Code Standard 9 (Complaints and Appeals)	Students must have access to fair, confidential and free internal complaints processes.	Section 10 – Complaints and Reporting	Documented complaints process, procedural fairness, protection from victimisation.
Equal Opportunity Act 1984 (WA)	Prohibits discrimination, harassment and victimisation on protected grounds including race and religion.	Sections 2, 7 – Legislative Framework; Protection from Vilification	Zero-tolerance discrimination policy, staff training and complaint mechanisms.
Criminal Code Act Compilation Act 1913 (WA) ss 77–80B	Criminal offences for serious racial vilification.	Sections 2, 7 – Legislative Framework; Protection from Vilification	Clear definition of vilification, escalation to external authorities where required.