

4 March 2022

Queensland Human Rights Commission
1 William Street
BRISBANE QLD 4000

By email: adareview@qhrc.qld.gov.au

Dear Commission,

Review of Queensland's Anti-Discrimination Act 1991

Thank you for the opportunity to provide feedback on Queensland's discrimination law, and the *Anti-Discrimination Act 1991* (the **Act**). Aged and Disability Advocacy Australia (**ADA**) appreciates the opportunity to provide feedback to inform the review of this important legislation.

About ADA Australia

ADA is a not for profit, independent, community-based advocacy and education service with 30 years' experience in informing, supporting, representing and advocating in the interests of older people, and persons with disability in Queensland.

ADA also provides legal advocacy through ADA Law, a community legal centre and a division of ADA. ADA Law provides specialized legal advice to older people and people with disability, including those living with cognitive impairments or questioned capacity, on issues associated with human rights, elder abuse, and health and disability legal issues related to decision-making.

ADA advocates and ADA Law's legal practitioners work with identified First Peoples advocates through the Aboriginal and Torres Strait Islander Disability Network Queensland (**ATSIDNQ**), a network established to support mob with disability and provide individual advocacy services for Aboriginal and Torres Strait Islander people with disability.

Review of Queensland's discrimination law

ADA has reviewed the discussion paper and provides the following in response to some of the questions raised in the discussion paper, for the Commission's consideration.

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ADA Australia acknowledges the Traditional Custodians of this land and pays respect to Elders, past and present.
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Key concepts

1. *Meaning of discrimination - Should the Act clarify that direct and indirect discrimination are not mutually exclusive?*

Yes, clarification to this effect would be useful, particularly for persons without access to legal representation or advocacy support and who are seeking to understand their position and how their experience of discrimination will be interpreted under the legislation. This clarification is critical for a person who is deciding whether they should make a complaint.

2. *Direct discrimination*
 - a. *Should the test for direct discrimination remain unchanged, or should the 'unfavourable treatment' approach be adopted?*
 - b. *Alternatively, is there a different approach that should be adopted? If so, what are the benefits of that approach?*

The current test is artificial and does not respond well to practical application. Reliance on comparison is conceptually flawed, and reliance on this approach may not accurately detect discriminatory behaviour. For example, it is very difficult to place the 'comparable person', who does not possess the protected attribute, in the exact same circumstances as a complainant. Doing so requires an assessor to divorce themselves of any unconscious bias that they may have in relation to persons with one or more protected attributes, such as assumptions about the decision-making capacity of a person with cognitive disability. This is a difficult task that will bring about variable results, depending on the understanding of the particular attribute and the lived experience of the assessor.

ADA prefers the 'unfavourable treatment' approach, which does not rely on making a comparison as under the current test, and which in our view will more clearly identify whether or not discrimination has taken place.

The test set out in the *Racial Discrimination Act 1975* (Cth) might also be considered, with reference to the protected attributes set out in the Act.

3. *Indirect discrimination*
 - a. *Should the test for indirect discrimination remain unchanged, or should the 'disadvantage' approach be adopted?*
 - b. *Alternatively, is there a different approach that should be adopted? If so, what are the benefits of that approach?*

As with direct discrimination, ADA considers that the test should not rely upon a comparator. We suggest that the test should be replaced with the 'disadvantage' approach, where a policy, practice, rule or arrangement is shown to disadvantage a person with one or several protected attributes.

4. *Do you support a unified test for both direct and indirect discrimination? Why or why not?*

No. Although the final outcome may be a finding of discrimination, whether that is direct or indirect, the circumstances and factors which are relevant to identifying discrimination in either case may be very different. Although a person may experience both direct and indirect discrimination at the same time (and the Act should recognise this), it is difficult to envisage a unified test which could be relied upon in every circumstance.

5. *Special services or facilities*

- a. *Should an exemption of unjustifiable hardship relating to the supply of special services or facilities be retained? If so, in which areas?*
- b. *Should the factors relevant to determining unjustifiable hardship be redefined, and if so how?*
- c. *How can the compliance costs for business and organisations be appropriately considered and weighed?*

Yes, an exemption of unjustifiable hardship should be retained, however, there are significant concerns that this exemption is routinely relied on to avoid making any adjustment, particularly where the adjustment has a cost implication and in this event, without any real dissection of whether the impacts of the adjustments (costs or otherwise) are unreasonable having regard to all the circumstances. Also, given changes in technology and social policy, this exemption should be rigorously examined regularly.

Some disputes which arise in scenarios where an adjustment is summarily refused may be avoided if a positive obligation was adopted by the Act (see response to question 6 **below**).

6. *Reframing to a positive obligation*

- a. *Should the Act adopt a positive duty to make 'reasonable adjustments' or 'reasonable accommodations'?*
- b. *If you consider that this approach should be adopted:*
 - i. *Should this be a standalone duty?*
 - ii. *What factors should be considered when assessing 'reasonableness' of accommodations?*
 - iii. *Should it apply to disability discrimination, other specific attributes, or all attributes?*
 - iv. *Should it apply to specific areas of activity or all areas? For example, should it apply to goods and services, work, education, and accommodation?*
 - v. *How would any amendments interact with exemptions involving unjustifiable hardship? Would there be a need to retain the concept of unjustifiable hardship at all?*

ADA supports the adoption of a standalone, positive duty in the legislation to make reasonable adjustments or accommodations. This should be incorporated as a principle of the Act, and in doing so, would apply to all attributes, not just some.

Inclusion of this as a standalone duty will not conflict with retention of exemptions involving unjustifiable hardship. It would remain a question as to whether the adjustment or accommodation is reasonable, or unreasonably onerous to implement in all of the circumstances. However, establishment of a positive obligation as an in-principle duty will have the positive effect of shifting the obligation to identify and acknowledge unfavourable treatment generally, and provide an

impetus onto persons and entities in influential positions to take reasonable steps to prevent discrimination. This will have the effect of promoting equitable treatment and supporting the purposes of the Act.

7. Discrimination on combined grounds

- a. Is there a need to protect people from discrimination because of the effect of a combination of attributes?*
- b. If so, how should this be framed in the Act?*
- c. Should other legislative amendments be considered to better protect people who experience discrimination on the basis of combined grounds?*
- d. What are some examples of where the current law does not adequately protect people from discrimination on combined grounds?*

Yes, it is important that the Act is amended to recognise intersectional discrimination, and to allow an application on the basis of the combined effect of more than one protected attribute. An application should not fail on the basis that a person is treated unfavourably because of several combined attributes, but does not have a single prominent ground of discrimination.

8. Burden of Proof

- a. Should the onus of proof shift at any point in the process?*
- b. If yes, what is the appropriate approach?*

ADA supports the 'partial reversal' approach, as set out in Community Legal Centres Queensland's plan (the **CLC Plan**).¹

9. Meaning of sexual harassment

- a. Should the additional words 'in the presence of a person' be added to the legal meaning of sexual harassment in the Act? What are the implications of this outside of a work setting?*
- b. Should a further contravention of sex-based harassment be introduced? If so, should that be applied to all areas of activity under the Act?*
- c. Should the Act explicitly prohibit creating an intimidating, hostile, humiliating or offensive environment on the basis of sex? If so, should that apply to all areas of activity under the Act?*

ADA supports the change as proposed in (a). Further, the Act should explicitly prohibit creating an intimidating, hostile, humiliating or offensive environment, based on sex, sexual orientation, or gender identity, which is applied to areas of activity under the Act.

Dispute resolution

10. Two-stage enforcement model

- a. Should the Act include a direct right of access to the tribunals?*

¹ Community Legal Centres Queensland, *Ten point plan for a fairer Queensland*, <<https://www.communitylegalqld.org.au/reviewofantidiscrimination/>>.

- b. *Should a complaint or respondent be entitled to lodge their complaint directly with a tribunal?*
- c. *Should a person be entitled to apply directly to the Supreme Court where circumstances raise matters of significant public interest matters? If so:*
 - i. *Should it be confined to certain matters?*
 - ii. *What remedies should be available to the complainant?*
 - iii. *Who would have standing to bring the complaint?*
 - iv. *What are the risks and benefits of any direct rights of access?*
 - v. *What circumstances could these amendments apply to?*
Provide examples to justify this approach.
 - vi. *How could the process be structured to ensure that tribunals and the Supreme Court are not overwhelmed with vexatious or misconceived claims?*

The Act should not include a direct right of *initial* access to the Tribunal. There is a risk of vexatious litigants, and as such, a vetting process facilitated by making complaints to the Commission in the first instance is valuable and should be retained. However, there should be an avenue for certain matters, such as those considered by the Commission to be in the public interest or unsuitable to be dealt with by the Commission in the usual way, to be fast tracked and to skip actions usually required, prior to the Tribunal becoming involved.

Avenues to escalate a complaint should be permitted, in circumstances where resolution has not been achieved via the Commission or the Tribunal.

11. Terminology

- a. *Should the 'complaint-based' terminology be changed?*
- b. *If so, what should it be replaced with?*

ADA supports review of complaint-based terminology with a view to adopting a preventative approach through changes to language. Doing so would support, and work in conjunction with the positive obligation. A positive obligation would lead to a culture of positive duties. The CLC Plan provides a good example of how this mechanism would operate.

12. Written complaints

- a. *Should non-written requests for complaints be permitted, for example by video or audio?*
- b. *Alternatively, should the Commission be allowed to provide reasonable help to those who require assistance to put their complaint in writing?*
- c. *How would this impact on respondents?*
- d. *How can the right balance be achieved between ensuring certainty for the respondent about the contents of the complaint while addressing the barriers to access?*

Non-written requests should be accepted. Limiting the method of complaint to written requests reduces the ability for many to participate in the process, and as a result, to access the avenues for resolution and restoration that are offered by the Act. In the context of disability, acceptance of complaints expressed in other forms in addition to writing will support Article 21 of the Convention on the Rights of Persons with Disabilities (the **CRPD**), to which Australia is an original signatory. It also should not be assumed that every respondent would prefer to receive a copy of the complaint in

writing – accessible avenues to make a complaint, and to understand a complaint received, should be available for both parties.

There also needs to be greater clarity around the process of making a complaint for persons with cognitive impairment, as well as a right of representation for these persons. A person with a cognitive disability may well want to make a complaint, but their formal decision maker may prevent this being made. A process of representation if the person has a meritorious case needs to be considered.

13. Efficiency and flexibility

- a. How can the law be adapted to allow a more flexible approach to resolving complaints?*
- b. Should the current provisions that require set notification and conference timeframes be retained, changed or repealed?*
- c. Should all complaints proceed through the same conciliation model, or should early intervention be an option?*
- d. What legislative or non-legislative measures should be in place to ensure procedural fairness, timeliness, and efficiency?*

Amendments to the Act should be made with recognition of the diversity of persons, characteristics and circumstances that may be relevant when a person experiences discriminatory behaviour. This should include a degree of flexibility in the legislation, to ensure that persons with one or several protected attributes are well supported to access the avenues for complaint progression and resolution set out by the Act.

For complainants, this should include a right to legal representation at each stage of the complaints process, including before the Tribunal, irrespective of what the person's protected attribute or attributes may be.

With respect to c), we refer to our response to question 10. ADA considers that the Commission should be permitted to develop a process which permits expedited intervention, including a discretion to fast-track cases rather than requiring that the parties traverse the conciliation model.

Discretion to permit early intervention should be made by the Commission having regard to the circumstances of the complainant and the complaint, including with respect to the power imbalance between the parties.

14. Time limits

- a. Is 1 year the appropriate timeframe within which to lodge a complaint? Should it be increased and if so, by how long?*
- b. Should there be special provisions that apply to children or people with impaired decision-making capacity?*
- c. Should out of time complaints that have been accepted at the Commission as showing 'good cause' be subjected to the further requirement of proving 'on the balance of fairness between the parties, it would be reasonable to do so' before being dealt with by the tribunal?*
- d. Should the tribunal review the commission's decisions to decline complaints instead of the Supreme Court?*

ADA strongly supports increasing the 12-month timeframe for raising a complaint. The increased period should be sufficiently capacious to acknowledge known or likely barriers that are likely to delay commencing the complaint process.

For example, trauma resulting from the discrimination may continue to impact an individual such that they are unable to raise a complaint earlier; continued employment at the place where discriminatory behaviour is experienced; in circumstances where the complainant is a child; where the discrimination is caused by an institution or carer that the person remains reliant upon.

A firm timeframe may not be appropriate in all of the circumstances. The Act should be amended to allow greater flexibility for 'out of time' applications.

With respect to d), ADA considers that the Tribunal should be empowered with authority to review complaints declined by the Commission. Access to the Supreme Court is largely unobtainable for most people.

16. Organisation complaints

- a. Should a representative body or a trade union be able to make a complaint on behalf of an affected person about discrimination? Why or why not?*
- b. Should representative complaints be confined to the conciliation process, or should they be able to proceed to the tribunal?*

ADA supports the ability of representative bodies to make a complaint on behalf of an affected person. The complaints process is daunting, and individuals who have experienced discrimination are often anxious about facing the respondent. Seeking resolution with the support of a representative body should continue to be permitted. This ability should be expanded to expressly include trade unions.

In our view, representative complaints should not be confined to the conciliation process. We cannot identify a justifiable reason why complaints of this type should be disallowed from proceeding to the Tribunal.

17. Complaints by prisoners

- a. Should the additional requirements for prisoners to make complaints be retained, amended, or repealed?*
- b. Do the current provisions strike the right balance in ensuring access to justice while encouraging early resolution?*
- c. Should any internal complaint requirements for prisoners be retained, and if so, how can they be simplified to overcome practical concerns?*

The current provisions do not strike an appropriate balance between ensuring access to justice and encouraging early resolution, and should be repealed. The additional requirements for prisoners to make a complaint are in our view, inadequately justified, and are dismissive of the significant challenges that an incarcerated person will face when seeking to resolve a complaint. The additional requirements also fail to acknowledge the substantial percentage of prisoners with multiple protected attributes. Almost 50% of persons entering prison have a disability, particularly a cognitive

or psychosocial disability.² Additional requirements on the basis of being a prisoner alone is arguably not only inconsistent with the Act's intent, it fails to consider intersecting attributes that may be related to the discrimination that is the subject of a complaint – further entrenching the disadvantaged position of the complainant, not just as a prisoner, but as a person with other attributes that the Act supposes to protect.

The current internal complaint requirements, if retained, must be modified in recognition of the significant barriers that a prisoner faces in being believed, and should include accessible pathways for a prisoner to make a complaint with respect to actions, policies or other behaviours imposed or condoned by the correctional facility and staff.

19. Objectives of the Act

- a. What should be the overarching purposes of the Anti-Discrimination Act?*
- b. Should an objects clause be introduced?*
- c. If so, what are the key aspects that it should contain?*
- d. If the purposes of the Act change, should the name of the legislation change to ensure it reflects those purposes?*

The Act should promote a positive message of inclusion with mechanisms that promote and facilitate the progression of a complaint, in recognition of the additional challenges that are often faced by persons with the attributes identified by the Act. ADA supports the statements made by the CLC plan with respect to the purpose of discrimination laws in Queensland, and the need for reforms to better reflect community expectations in relation to legislation that upholds these individual rights.

21. Positive duties

- a. Do you support the introduction of a positive duty in the Anti-Discrimination Act?*
- b. Should a positive duty cover all forms of prohibited conduct including discrimination, sexual harassment, and victimisation,? Why, or why not?*
- c. Should a positive duty apply to all areas of activity in which the Act operates, or be confined to certain areas of activity, such as employment?*
- d. Should a positive duty apply to all entities that currently hold obligations under the Anti-Discrimination Act?*
- e. What is the extent of the potential overlap between WHS laws and a positive duty in the Anti-Discrimination Act? If a positive duty is introduced, what consideration would apply to the interface between existing WHS laws and the Anti-Discrimination Act?*
- f. What matters should be considered in determining whether a measure is reasonable and proportionate?*

ADA supports the concept of including positive duties in the Act, which should align with the insertion of the positive obligation principal. Positive duties should apply to all protected attributes, and guidance material developed with respect to how a positive duty is intended to operate, and how it should be adopted by a person/entity and reasonably adjusted to the circumstances to which it applies.

² Human Rights Watch, *I needed help, instead I was punished*, 2017, 2 <
https://www.hrw.org/sites/default/files/report_pdf/australia0218_web.pdf>.

There should be further consultation with not for profits with a view to developing requirements with respect to implementation and monitoring that are not so onerous that they cannot be complied with.

22. Regulatory approach and the role of the Commission

- a. Should the statutory framework be changed to incorporate a role in regulating compliance with the Anti-Discrimination Act and eliminating discrimination?*
- b. If so, do you consider that the Commission should undertake this regulatory role, or is there a more appropriate entity? What are the strengths and limitations of the Commission undertaking a regulatory role?*
- c. What should be the core components of the regulatory model, and what mechanisms and powers should it include?*
- d. What key features should a regulatory approach adopt to ensure it achieves the right balance between supporting organisations to comply with the Act and ensuring organisations, particularly small and medium-sized entities, are not unnecessarily burdened with regulation?*
- e. If you recommend an expansion of the Commission's functions and powers, what is the justification for this expansion?*

The Commission is the entity best placed to undertake a regulatory compliance role. Procedurally, there should be separation of investigation and enforcement responsibilities, to ensure that the same officer is not tasked with both functions in relation to investigation of a person or entity. Existing provisions with respect to similar mechanisms under WHS laws may be a useful model.

23. Role of Tribunals

- a. Should there be a specialist list for the tribunals?*
- b. If so, what would the appropriate qualifications be for a tribunal decision-maker?*
- c. Should a uniform set of procedural rules be developed to apply across both tribunals?*
- d. Should the tribunals be required to publish all decisions/ substantive decisions?*
- e. Could data sharing be permitted and encouraged between Commission and tribunals to form a better overall picture?*
- f. On what basis should the Commission be permitted to intervene in proceedings under the Anti-Discrimination Act. Should leave of the court or tribunal be required? Why or why not?*
- g. What other issues relating to the functions, processes, power, and outcomes of the Tribunals should be considered by the Review?*

ADA strongly supports the establishment of a specialist list for hearing discrimination matters. A panel approach may be useful, including a legal member and a person with lived experience of a protected attribute.

We agree that publishing of substantive decisions, if not all is in the public interest, with measures to deidentify a complainant.

We support the Commission's ability to intervene in proceedings under the Act with leave of the court or tribunal, and without leave where the Commissioner is of the view that it is an issue of public interest.

Critical functionality issues must be overcome to facilitate the effective establishment, and utility, of a specialist list. This includes adequate funding to the Commission and tribunal to undertake the expanded functions and ensure administration of justice in accordance with the Act.

Grounds of discrimination

25. Current attribute – impairment

- a. Should the attribute of impairment be replaced with disability?*
- b. Should a separate attribute be created, or the definition amended to refer specifically to mental health or psychosocial disability?*
- c. Should the law be clarified about whether it is intended to cover people who experience addiction?*
- d. Should reliance on a guide, hearing or assistance dog be broadened to be reliance on an assistance animal? Should it only apply to animals accredited under law? How would this approach work with the Guide, Hearing and Assistance Dogs Act 2009?*

ADA supports use of the term 'disability'.

ADA supports creation of a separate attribute in relation to mental health and psychosocial disability, which would better recognise the stigma and discrimination which is commonly experienced by persons with one or both of these attributes. We support clarification as to whether one of these attributes is intended to cover persons who experience addiction, and suggest that a separate attribute may be required.

ADA supports broadening the language of assistance dog to assistance animal. Several forms of assistance animals are now accepted in a variety of contexts. The updated Act should reflect this.

26. Current attribute – gender identity

- a. Should there be a new definition of gender identity, and if so, what definition should be included in the Act?*

27. Current attribute – sexuality

- a. Should there be a new definition of sexuality, and if so, what definition should be included in the Act?*

28. Current attribute – lawful sexual activity

- a. Should there be a new definition of lawful sexual activity, and if so, what definition should be included in the Act? Should the name of the attribute be changed, and if so, what should it be?*

In relation to questions 26-28, ADA supports a new definition for each attribute. The current definitions are outdated and do not reflect community expectations.

The definitions of gender identity and sexuality in the recently amended *Public Health Act 2005* (Qld) should replace the current definitions in the Act. With respect to 'lawful sexual activity', a definition suggested as an outcome of the Queensland Law Reform Commission's review is likely to be preferred. We note with support the meaning of this term in Victoria and Tasmania.

30. *Additional attributes*

- a. *Is there a need to cover discrimination on the grounds of irrelevant criminal record, spent criminal record, or expunged homosexual conviction?*
- b. *How should any further attribute(s) be framed? Should they apply to all areas?*
- c. *What are some examples of how people who have had interactions with law enforcement experience discrimination, including by whom and in what settings?*
- d. *How would the inclusion of these attributes interact with the working with children checks (Blue Cards)?*

There is a need to cover discrimination in relation to the grounds set out in a). In our experience, irrelevant or spent criminal records can continue to have damaging impacts for persons on forensic orders, with irrelevant criminal histories that continue to be considered by the Mental Health Review Tribunal.

32. *Is there a need for the Act to cover discrimination on the grounds of immigration status? If so, should it stand alone or be added as another aspect of 'race'?*

Yes, and the attribute should be clearly distinguished from race. Though we note that several of the issues commonly expressed in relation to unfavourable treatment and immigration status are Commonwealth issues, such as access to Medicare.

33. *Is there a need for the Act to cover discrimination on the grounds of employment activity? Is this an unnecessary duplication of protections under the Fair Work Act?*

34. *Is there a need for the Act to cover discrimination on the grounds of physical features?*

35. *Gender - Should an additional attribute of 'gender' be introduced? Should it be defined, and if so, how?*

36. *Sex Characteristics - Should an additional attribute of sex characteristics be introduced? Should it be defined, and if so, how?*

37. *Domestic Violence - Should an additional attribute of subjection to domestic violence be introduced? Should it be defined, and if so, how?*

38. *Accommodation status - Should an additional attribute of accommodation status be introduced? Should it be defined, and if so, how?*

With respect to questions 33 – 38, ADA supports inclusion of additional attributes to cover discrimination associated with the status or characteristics identified therein.

Regarding accommodation status – this is a growing problem that many ADA clients report causes unfavourable treatment. For persons who are the subject of a Forensic Order or prisoners, lack of available accommodation is often the only reason which is relied upon as justification for remaining in the custody of a health or correctional facility.

Exemptions

40. General exemptions – sport

- a. Should the sport exemption be retained, amended, or repealed?*
- b. Should competitive sporting activity be more clearly defined?*
- c. Is strength, stamina or physique the appropriate consideration when restricting access to competitive sporting activity based on sex, gender identity, and sex characteristics? If not, what would be an alternative test to ensure fairness and inclusion in sporting activities?*

With respect to c), ADA prefers use of the terms ‘strength’, ‘stamina’ and ‘performance’, rather than physique or gender description.

41. General exemptions – religious bodies

- a. Should the scope of the religious bodies’ exemption be retained or changed?*
- b. In what areas should exemptions for religious bodies apply, and in relation to which attributes?*

Discrimination in relation to a recognised attributed under the Act on the basis of religious grounds should not be permitted.

42. Should religious bodies be permitted to discriminate when providing services on behalf of the state such as aged care, child and adoption services, social services, accommodation and health services?

No, these are public interest activities and should reflect community expectations that the primary purpose of these services is to support and prioritise the individual who receives the service, rather than the institution which accommodates, facilitates or provides the support. It should also be noted that in many cases these institutions are contracted with public funding for the provision of these services.

43. Should religious bodies be permitted to discriminate when providing accommodation on a commercial basis including holiday, residential and business premises?

No, this should not be permitted.

44. Work exemptions – religious educational institutions

- a. Should the religious educational institutions and other bodies exemption be retained, changed, or repealed?*
- b. If retained, how should the exemption be framed, and should further attributes be removed from the scope (currently it does not apply to age, race, or impairment)?*

If the exemption is to be retained, ADA supports the Tasmanian model in relation to religious school employment, which determines that religious educational institutions cannot discriminate on any ground except for religious belief, affiliation, or activity in the area of employment.

45. Work exemptions – working with children

- a. Are there reasons why the work with children exemption should not be repealed?*

46. Goods and services exemption – assisted reproductive technology

- a. Are there reasons why the Act should not apply to provision of assisted reproductive technology services?*

47. Accommodation exemption – sex workers

- a. Should the sex worker accommodation exemption be retained, changed or repealed?*

ADA considers that the current exemptions described in questions 45 – 47 should be repealed.

Thank you again for the opportunity to comment. ADA would be pleased to further assist the Commission with its inquiry. Should you wish to discuss this submission, please do not hesitate to contact Vanessa Krulin, Solicitor and Senior Policy and Research Officer on 07 3637 6036 or via vanessa.krulin@adaaustralia.com.au.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Geoff Rowe', with a long horizontal stroke extending to the right.

Geoff Rowe

Chief Executive Officer