

Review of Queensland's Anti-Discrimination Act

Submission to the Queensland Human Rights
Commission

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Who we are

The Australian Lawyers Alliance (ALA) is a national association of lawyers, academics and other professionals dedicated to protecting and promoting justice, freedom and the rights of the individual.

We estimate that our 1,500 members represent up to 200,000 people each year in Australia. We promote access to justice and equality before the law for all individuals regardless of their wealth, position, gender, age, race or religious belief.

The ALA is represented in every state and territory in Australia. More information about us is available on our website.¹

The ALA office is located on the land of the Gadigal of the Eora Nation.

¹ www.lawyersalliance.com.au.

Introduction

1. The ALA welcomes the opportunity to have input into the review of the Queensland *Anti-Discrimination Act 1991* ('the Act'), currently being undertaken by the Queensland Human Rights Commission ('the QHRC').
2. This submission focuses on the following areas:
 - Meaning of discrimination;
 - Grounds of discrimination;
 - Exemptions;
 - Human Rights analysis.

Key concepts

Discussion question 1

Should the Act clarify that direct and indirect discrimination are not mutually exclusive?

3. The ALA submits that the Act should follow the example of section 8 of the *Discrimination Act 1991* (ACT) and include a provision that clarifies that conduct can be both direct and indirect, by using the words 'when a person discriminates either directly or indirectly, or *both*, against someone else' and then separately defining the two concepts.

Discussion question 2

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

4. The ALA submits that the definition of direct discrimination be amended. The new definition should remove the comparator as an essential element that currently exists in section 10 of the Act.
5. The ALA submits that the 'unfavourable treatment' approach that has been adopted in the ACT and Victoria, should also be adopted in the Queensland Act.

Discussion question 3

Should the test for indirect discrimination remain unchanged, or should the ‘disadvantage’ approach be adopted? Alternatively, is there a different approach that should be adopted? If so, what are the benefits of that approach?

6. The ALA submits that the test for indirect discrimination should be changed. The current test in section 11 of the Act involves determining the appropriate comparator group for proportional comparison. This can be problematic and require time-consuming analysis and discussion. Depending on the specific circumstances, the relevant comparative group may not always be clear.
7. In addition, the proportionality test can be difficult to apply and often requires comparisons of statistics and other complex evidence in order to successfully prosecute a claim.
8. The ALA submits that removing the proportionality test would simplify the test for indirect discrimination. It would also allow the Act to provide redress for indirect discrimination, which might otherwise fail due to an inability to satisfy the complex and unnecessary proportionality test. It would also align the Act with the Australian Capital Territory, Tasmanian, Victorian and Federal sex and age discrimination legislation.
9. The ALA submits that the definition of indirect discrimination should be amended to:
 - remove the proportionality test;
 - add a new criterion that complainants must demonstrate that their inability to comply with the relevant requirement, condition or practice (due to their attribute) causes them detriment or disadvantage; and
 - shift the onus of proof from the complainant to the respondent to show that a requirement or condition found to be discriminatory is reasonable in the circumstances.

Discussion question 4

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

10. The ALA does not support a unified test at this time as it would mean that the anti-discrimination scheme would operate quite differently to the anti-discrimination schemes in operation in other States and Territories and at the federal level. The ALA submits that the

question of a unified test for both direct and indirect discrimination should be revisited in the event that such a test is adopted in Commonwealth discrimination laws.

Discussion question 9

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?

11. Yes. The ALA submits that the words ‘in the presence of a person’ be added to section 119 of the Act, which is the approach that has been adopted in ACT.

Should a further contravention of sex-based harassment be introduced? If so, should that be applied to all areas of activity under the Act?

12. Yes. The ALA submits that ‘sex-based harassment’ should be a separate contravention and that it should be applied to all areas of activities under the Act.

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?

13. Yes. The ALA submits that the Act should prohibit the act of ‘creating an intimidating, hostile, humiliating or offensive environment on the basis of sex’.

Dispute resolution

Discussion question 10

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

14. The ALA submits that the Act include a direct right of access to the tribunals to allow complainants to make their complaint.

Should a complainant or respondent be entitled to refer the complaint directly to a tribunal?

15. The ALA submits that the complainant be entitled to make a complaint directly to a tribunal against the respondent who unlawfully discriminated.

Should a person be entitled to apply directly to the Supreme Court where circumstances raise matters of significant public interest matters? If so: Should it be confined to certain matters?

16. Yes. The ALA submits that a person should be entitled to apply directly to the Supreme Court where circumstances raise matters of significant public interest matters.
17. The ALA submits that this amendment under the Act would provide a quick and determinative resolution of matters of public interest.

What remedies should be available to the complainant?

18. The ALA submits that the remedies should be extended to both mandatory and prohibitory injunctive relief.

Who would have standing to bring the complaint?

19. The ALA submits that the complainant should have standing to bring the complaint under the Act.

What are the risks and benefits of any direct rights of access?

20. The ALA submits that there is a potential risk association which could include that the parties enter a costs jurisdiction at an early stage.

How could the process be structured to ensure that tribunals and the Supreme Court are not overwhelmed with vexatious or misconceived claims?

21. The ALA submits that the two-stage enforcement process under the Act is to avoid an influx of vexatious or misconceived claims which create too much of a burden on respondents.
22. The ALA submits that the Act could adopt a similar approach to New Zealand's equality legislation, which allows for the tribunal to refer a case back to conciliation before the Commission where they consider that an attempt at resolution has not been made, unless the conciliation process will not be constructive, will not be in the public interest, or will undermine the urgent or interim nature of the proceedings.

Discussion question 11

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

23. Yes. The ALA submits that the 'complaint-based' terminology should be changed to terms such as 'dispute parties', 'dispute resolution' and 'conflict resolutions.'

Discussion question 12

Should non-written requests for complaints be permitted, for example by video or audio?

Alternatively, should the Commission be allowed to provide reasonable help to those who require assistance to put their complaint in writing?

24. Yes. The ALA submits that non-written requests for complaints should be permitted under the Act to allow people who speak a language other than English, people with low literacy and Aboriginal and Torres Strait Islander peoples the opportunity to access the complaints process.

25. The ALA submits that the Commission should be allowed to provide reasonable help to help those who require assistance to put their complaint in writing or provide their complaint by video or audio.

How would this impact on respondents?

26. The ALA submits that the impact on respondents would be understanding the allegations contained in the non-written complaint.

Discussion question 14

Is 1 year the appropriate timeframe within which to lodge a complaint? Should it be increased and if so, by how long?

27. The ALA submits that the 1-year timeframe under the Act should be increased to at least two years, which is in line with the time limit under the *Sex Discrimination Act 1984* (Cth).

Should there be special provisions that apply to children or people with impaired decision-making capacity?

28. Yes. The ALA submits that special provisions should be applied to children or people with impaired decision-making capacity.

Should the tribunal review the Commission's decisions to decline complaints instead of the Supreme Court?

29. The ALA submits that the tribunal should review the Commission's decision to decline complaints instead of the Supreme Court and that the approach adopted in Victoria, ACT, South Australia and under federal Acts be adopted in the Act.

Discussion question 16

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?

30. Yes. The ALA submits that a representative body or a trade union should be able to make a complaint on behalf of an affected person about discrimination if they have obtained the complainant's consent.

Discussion question 17

Should the additional requirements for prisoners to make complaints be retained, amended, or repealed?

31. The ALA submits that these additional requirements for prisoners to make complaints be repealed as they create significant hurdles for prisoners and causes delay of making complaints.
32. In addition, prisoners should have the same level protection as all people in Queensland and be provided the opportunity to bring a complaint while serving their sentence.

Do the current provisions strike the right balance in ensuring access to justice while encouraging early resolution?

33. The ALA submits that the current provisions does not provide effective and early resolution of complaints as there are significant practical challenges which causes delays.

Grounds of discrimination

Discussion question 25

Should the attribute of impairment be replaced with disability?

34. Yes. The ALA submits that the term 'impairment' is outdated and that 'disability' is now the more commonly used term and has greater understanding. The ALA submits that 'disability' is consistent with international human rights instruments, particularly *the Convention on the Rights of Persons with Disabilities*.

Should a separate attribute be created, or the definition amended to refer specifically to mental health or psychosocial disability?

35. Yes. The ALA agrees that a separate attribute of ‘mental health condition’ or ‘psychosocial disability’ to make it clearer that these forms of impairment are also protected.

Should the law be clarified about whether it is intended to cover people who experience addiction?

36. Yes. The ALA submits that the statutory definition should be clarified to make it clear that the attribute covers people who experience addiction to substances, both licit and illicit.

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*?

37. The ALA submits that reliance on a guide, hearing or assistance dog be broadened to be reliance on an assistance animal, by adopting the phrase used in the definition of disability in section 5AA(2)(d) and (3) of the *Discrimination Act 1991* (ACT): ‘... *reliance on a support person, or a disability aid, or an assistance animal...*’

38. The ALA submits that as in the ACT, it is appropriate that an assistance animal be required to be accredited under law or by an organisation to meet certain thresholds of hygiene and behaviour. This may require an amendment to *the Guide, Hearing and Assistance Dogs Act 2009*.

Discussion question 26

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

39. Yes. The ALA submits that the definition of gender identity should be inclusive, drawing on the terminology used in the *Yogyakarta Principles*, which set out a set of principles on the application of international human rights law in relation to sexual orientation, gender expression and sex characteristics. These are reflected in the *Public Health Act 2005* (Qld).

Discussion question 27

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

40. Yes. The ALA submits that the current definition of sexuality is too narrow. The ALA submits that the definition should be amended to be consistent with the broader definition included in section 213E of the *Public Health Act 2005* (Qld).

Discussion question 28

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?

41. The ALA submits that the name of the attribute should be changed to ‘... any sexual activity and includes engaging in, not engaging in or refusing to engage in lawful sexual activity’, as reflected in section 3 of the *Anti-Discrimination Act 1998* (Tas) and section 4(1) of the *Equal Opportunity Act 2010* (Vic). The ALA submits that such a definition is less restrictive and provides greater protection for sex workers, including those who for a range of reasons operate outside the law.

Discussion question 29

Does the terminology used to describe any existing attributes need to be changed?

42. Yes. Refer to our response to Discussion question 25.

For attributes that have a legislative definition in the Act, do those definitions need to change? For attributes that do not have a legislative definition, should a definition be introduced?

43. Refer to our responses to Discussion questions 26-28.

Should the Act separately prohibit discrimination because a person with a disability requires adjustments for their care, assistance animal, or disability aid?

44. Further to Discussion question 25 above, the ALA submits that the Act should separately prohibit discrimination on the basis that person with a disability requires adjustments for their care, assistance animal, or disability aid.

Discussion question 30

Is there a need to cover discrimination on the grounds of irrelevant criminal record, spent criminal record, or expunged homosexual conviction? How should any further attribute(s) be framed? Should they apply to all areas?

45. Yes. The ALA submits that discrimination on the grounds of irrelevant criminal record, spent convictions and expunged homosexual convictions should all be covered, as per the

protected attributes relating to criminal history in the *Discrimination Act 1991* (ACT), the *Anti-Discrimination Act 1992* (NT) and the *Anti-Discrimination Act 1998* (Tas).

46. The ALA submits that the protections should extend to all areas of activity, not just in relation to employment. The ALA does not consider it appropriate for discrimination the basis of irrelevant criminal record to continue in respect of accommodation, licensing applications or the provision of goods or services.

How would the inclusion of these attributes interact with the working with children checks (Blue Cards)?

47. The ALA submits that an approval for working with children (Blue Card) should not be denied on the basis of an irrelevant criminal record or an expunged homosexual conviction. The ALA submits that it is not appropriate to deny a Blue Card merely on the basis of an arrest, interrogation, or where charges have been withdrawn, where a person has been acquitted or where the circumstances of the offence are not directly relevant to the purpose for which the Blue Card is sought.
48. The effect of denying access to a Blue Card for these reasons is to impose a penalty on a person for which there is insufficient evidence to remove a presumption of innocence of the matter(s) that are the subject of the irrelevant criminal record. The criminal record may have arisen due to a false report to police or inappropriate policing activity. Moreover, First Nations people and people of a disadvantaged background may be particularly susceptible to such policing activity and should not be denied employment opportunities to work with children on the basis of such activity.

Discussion question 31

Is there a need for the Act to cover discrimination on the grounds of irrelevant medical record?

49. Yes. The ALA submits that the Act should specifically prohibit discrimination on the grounds of irrelevant medical record, as per the *Anti-Discrimination Act 1992* (NT) and the *Anti-Discrimination Act 1998* (Tas).

Discussion question 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'?

50. Yes. The ALA submits that the Act should prohibit discrimination on the grounds of immigration status as it considers that this is not sufficiently protected by the existing attribute of race. The ALA submits that immigration should be a separate attribute, as per the *Discrimination Act 1991* (ACT).

Discussion question 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?

51. Yes. The ALA submits that the Act should cover discrimination on the grounds of employment activity.

52. The ALA does not consider this to be an unnecessary duplication of protections under the *Fair Work Act 2009* (Cth) ('FWA'). Moreover, the ALA considers that it provides an additional level of protection in the event that the FWA is subsequently amended to remove such protection.

Discussion question 34

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

53. Yes. The ALA submits that the Act should include an additional protected attribute of physical features, to prohibit discrimination because of characteristics such as height, weight, size and other bodily characteristics.

Discussion question 35

Should an additional attribute of 'gender' be introduced? Should it be defined, and if so, how?

54. Yes. The ALA submits that gender should be a separately protected attribute under the Act given that it is now considered a separate concept from gender identity, sex and sex characteristics.

55. The ALA submits that gender should be defined in accordance with the Australian Guidelines on Sex and Gender which states that gender refers to the manner in which a person feels,

presents and is recognised by the community, and may be reflected in outwards social markers, name, outward appearance, mannerisms and dress.²

Discussion question 36

Should an additional attribute of sex characteristics be introduced? Should it be defined, and if so, how?

56. Yes. The ALA submits that an additional attribute of sex characteristics should be introduced into the Act and be defined as per the characteristics identified in the preamble to the Yogyakarta principles: each person's physical features relating to sex, including genitalia and other sexual and reproductive anatomy, chromosomes, hormones, and secondary physical features emerging from puberty.

Discussion question 37

Should an additional attribute of subjection to domestic violence be introduced? Should it be defined, and if so, how?

57. Yes. The ALA submits that an additional attribute of subjection to domestic or family violence should be included in the same manner as it appears in the *Discrimination Act 1991* (ACT).

Discussion question 38

Should an additional attribute of accommodation status be introduced? Should it be defined, and if so, how?

58. Yes. The ALA submits that an additional attribute of accommodation status is an important mechanism to protect people from discrimination when they have no fixed address or secure accommodation.

59. The term 'accommodation status' should be defined in the same way that it is defined in the *Discrimination Act 1991* (ACT) as including:

- Being a tenant;

² Australian Government, *Guidelines on the Recognition of Sex and Gender* (November 2015) [13]–[15].

- Being a resident within the meaning of *the Residential and Tenancies and Rooming Accommodation Act 2008* (Qld);
- In receipt of, or waiting to receive, housing assistance; and
- Being homeless.

Exemptions

Discussion question 40

Should the sport exemption be retained, amended, or repealed?

60. The ALA submits that the sport exemption should be amended.

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?

61. The ALA considers that strength, stamina or physique is not the appropriate consideration when restricting access to competitive sporting activity based on sex, gender identity and sex characteristics. The ALA submits that a more appropriate test is that employed in the International Olympic Committee 2021 framework for the participation of transgender and intersex athletes in Olympic sports. The framework reconsiders disproportionate advantage on the updated understanding that ‘performance is not proportional to your in-built testosterone’. The framework requires that people should be able to compete in the category that best aligns with their self-identified gender, and that:

*Eligibility criteria should be established and implemented fairly and in a manner that does not systemically exclude athletes from competition based on their gender identity, physical appearance and/or sex variations.*³

Discussion question 42

Should religious bodies be permitted to discriminate when providing services on behalf of the

³ International Olympic Committee, *IOC Framework of Fairness, Inclusion and Non-Discrimination on the Basis of Gender Identity and Sex Variations*, principle 3.1.

state such as aged care, child and adoption services, social services, accommodation and health services?

62. The ALA submits that religious bodies should not 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.

Discussion question 43

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

63. The ALA submits that religious bodies should not be permitted to discriminate when providing services that are secular and do not involve spiritual teaching, the maintenance of religious doctrines or the observances that promote or manifest the religion. This would also include the provision of accommodation on a commercial basis.

64. This reflects the reasoning of the decision by the Victorian Civil and Administrative Tribunal in *Cobaw Community Health Services Limited v Christian Youth Camps Limited and Mark Rowe*⁴ in relation to an exemption for religious bodies under sections 75(2) and 77 of the Victorian *Equal Opportunity Act 1995* (which have since been replaced by ss 82-84 of the Victorian *Equal Opportunity Act 2010*). The tribunal concluded that in considering whether a body is established for a religious purpose one must consider the purposes of the entity concerned and whether they are directly and immediately religious.⁵ On appeal, the Victorian Court of Appeal concluded that it was open to the Tribunal to adopt this reasoning.⁶

Discussion question 44

Should the religious educational institutions and other bodies exemption be retained, changed, or

⁴ *Cobaw Community Health Services Limited v Christian Youth Camps Limited and Mark Rowe* [2010] VCAT 1613, per Justice Hampel, paragraphs 253, 288-307

⁵ *Cobaw Community Health Services Limited v Christian Youth Camps Limited and Mark Rowe* [2010] VCAT 1613, per Justice Hampel, paragraphs 253, 288-307. Deputy President Justice Hampel considered the purposes of Christian Youth Camp ('CYC') were essentially secular and related to the conduct of camping activities for both secular and religious groups that involved neither spiritual teaching, the maintenance of religious doctrines or the observances that promote or manifest the religion.

⁶ *Christian Youth Camps Limited v Cobaw Community Health Service Limited* (2014) 308 ALR 615, per Maxwell, P., at paragraphs 157-158, 245, 290, 304.

repealed? 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)?

65. The ALA submits that the Act should be amended to reflect the position in Tasmania and recently legislated in Victoria, such that religious educational institutions cannot discriminate on any ground except for religious belief, affiliation, or activity in the area of employment. This means a religious school can hire and retain staff of their same faith, but cannot discriminate against staff on other grounds, such as relationship status, gender identity, or sexuality.

Discussion question 45

Are there reasons why the work with children exemption should not be repealed?

66. The ALA submits that the work with children exemption should be repealed.

Areas of activity

Discussion question 52

Should the definition of goods and services that excludes non-profit goods and service providers be retained or changed?

67. The ALA submits that the definition of goods and services in the Act should be changed to ensure that non-profit goods and service providers are not permitted to discriminate when providing and delivering goods and services.

Should any goods and services providers be exempt from discrimination, and if so, what should the appropriate threshold be?

68. The ALA submits that goods and service providers should not be permitted to discriminate when providing services as there are many people in Queensland that rely on goods and service providers and that protections against discrimination are vital.

Discussion question 53

How should the Act define a 'club'?

69. The ALA submits that the Act should define a 'club' based on the number of members and whether the club holds a liquor licence or not.

70. The ALA submits that the definition of ‘club’ in section 4 of the *Disability Discrimination Act 1992* (Cth) could also be adopted in the Act.

Discussion question 54

Should a separate area of activity for sport be created?

71. Yes. The ALA submits that a separate area of activity for sport be created in the Act to prevent sport discrimination.

Human rights analysis

Discussion question 56

Are any provisions in the Anti-Discrimination Act incompatible with human rights? Are there any restrictions on rights that cannot be justified because they are unreasonable, unnecessary or disproportionate? Where rights are being limited to meet a legitimate purpose, are there any less restrictive and reasonably available ways to achieve that purpose?

72. The concepts of equality and non-discrimination are at the heart of human rights, as expressed in international human rights law and the *Human Rights Act 2019* (Qld) (‘the *QHRA*’). The ALA submits that this provides strong justification for close links between the Act and the *QHRA* as both recognise that every person has the right to equal and *effective* protection against discrimination.

73. The term “discrimination” is defined in the *QHRA* by direct reference to the Act. According to Schedule 1 of the *QHRA*:

Discrimination, in relation to a person, includes direct discrimination or indirect discrimination, within the meaning of the *Anti-Discrimination Act 1991*, on the basis of an attribute stated in section 7 of that Act.

Any amendment of the definition of “discrimination” in the Act will therefore also change the scope of the *QHRA*.

74. The ALA submits that removing some of the distinctions between the *QHRA* and the Act would provide clarity and certainty in the law. This would benefit the public sector in particular, and foster compliance with the *QHRA* and the Act. In particular, the ALA recommends the following:

- The Act should set a clear framework for the protection of human rights in Queensland that is consistent with the *QHRA*.
- The objectives of the Act should also recognise the QHRC’s obligations to protect and promote the human rights contained in the *QHRA*, particularly (but not exclusively) the right to recognition and equality before the law.
- The Act should reaffirm the requirement in the *QHRA* that all acts and decisions of the Commission be performed and made in a way that is cognisant of, and compatible with, the human rights contained in the *QHRA*.

75. The ALA notes that there are inconsistencies between the special measures exception, which appears in both the *QHRA* and the Act. Section 15(5) of the *QHRA* provides that special measures, taken for the purpose of assisting or advancing people disadvantaged because of discrimination do not constitute discrimination. The Act provides a more limited “special services” exception (s 10(5)). The ALA submits that s 15(5) of the *QHRA* is preferred and that the wording used in that section should be included in the Act.

76. The ALA also submits that the definition of direct discrimination in s 10(1) of the Act should be amended to overcome the limitations of the comparator test and reflect the aims of progressively achieving substantive equality and consistency with the *QHRA*.

Conclusion

77. The Australian Lawyers Alliance (ALA) welcomes the opportunity to have input into the QHRC’s review of the Queensland *Anti-Discrimination Act 1991*. The ALA is available to further assist the QHRC in this review should the Commission consider that helpful.

Sarah Grace



Queensland President

Australian Lawyers Alliance