

5 December 2025

[LP:MC]

Ms Deb Frecklington MP
Attorney-General and Minister for Justice
Minister for Integrity
1 William Street Brisbane
QLD 4000

By email: [REDACTED]

Dear Attorney-General

Anti-discrimination law reform

I write at the request of the Queensland Law Society's (QLS) Human Rights and Public Law Committee in respect of the Government's decision to pause changes to Queensland's anti-discrimination laws contemplated by the *Respect at Work and Other Matters Amendment Act 2024 (Amendment Act)*.

QLS acknowledges the Government's decision in March of this year to delay commencement of the anti-discrimination law reforms which were due to commence on 1 July 2025 (**the reforms**).

We note the Government sought to undertake further stakeholder consultation and seek advice regarding the broadening of protected attributes and potential impacts on statutory decision-making.¹

While we raised specific concerns about the former Government's consultation timeframe on the bill, this did not outweigh our overarching support for implementation of the comprehensive reform proposals stemming from the 2022 *Building Belonging Report* recommendations and associated stakeholder consultation.

Overdue reform

While QLS agrees that certain aspects of the reforms will involve a shift in the application of anti-discrimination laws in Queensland, in our view, this shift would be a positive one for Queenslanders, making anti-discrimination laws easier to understand and improving the legislative framework's capacity to address all forms of discrimination.

QLS supports the holistic approach adopted to develop the reforms, which centres prevention as the core focus, as it represents an appropriate balance in the context of changes in societal understandings of discrimination, and the increasing body of evidence on its wide-ranging and harmful impacts. We also observe the enhanced enforcement mechanisms the Amendment Act

¹ [MEDIA STATEMENT: Crisafulli Government to consult on anti-discrimination laws - Ministerial Media Statements](#).

prescribes for oversight bodies will have the additional benefit of ensuring compliance and likely reduce reliance on individual litigation.

Given the time that has passed since the reforms were paused, our members with expertise in this area have emphasised the continued challenges that will be faced by those seeking to access the current framework.

We endorse the submissions made by Basic Rights Queensland and the other co-signatories in their joint letter. QLS also wishes to highlight some additional matters relating to the impact the indefinite pause on the commencement of the Amendment Act will have on the legal profession (who provide advice to affected individuals and organisations) and wider members of the community.

Legislative uncertainty

The current legislation is structurally and conceptually complicated, in large part due to the piecemeal fashion in which previous reform has occurred. These successive amendments have significantly contributed to an overly complicated and inequitable system.

The ad hoc nature of past reforms has resulted in inconsistencies in how discrimination matters are resolved. This uncertainty impacts both legal practitioners and vulnerable community members seeking effective redress. For Queensland businesses, there remains a lack of legal certainty for organisations that have already taken active steps to integrate the impending reforms into their operational systems.

A staged reform process

The Amendment Act was designed to be implemented in stages, recognising both the urgency of modernisation and the complexity of certain issues. This staged approach ensures that core improvements can be delivered now, while more discrete or contentious matters can be resolved by further targeted and timely consultation. Targeted consultation on specific matters can and should occur in parallel, without further delay to the broader reform package.

Advancing the Amendment Act reforms is consistent with the Government's commitment to progress implementation of recommendations from the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability. In particular, recommendation 4.22 concerning strengthening disability rights protections in state and territory laws.

A direct and impactful way of fulfilling this commitment is the implementation of anti-discrimination law reforms in Queensland.

Supporting victims

Under the current framework, a victim bears a heavy onus in bringing a complaint upon which action then needs to be taken. Further, organisations are not required to take proactive steps to eliminate discrimination.

The reforms are important because they seek to change the current reactive legislative model to overcome systematic discrimination rather than focusing, to a large degree, on addressing individual complaints. For instance, there is evidence that victim-survivors of domestic or family violence may experience certain difficulties in relation to accommodation as well as in the workplace. The reforms would support victim survivors by recognising domestic and family

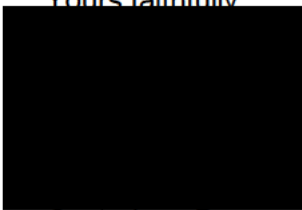
violence as a ground of discrimination and complement other strategies being progressed by the Government to decrease the social and economic costs of violence against women.

The implementation of the Amendment Act presents a crucial opportunity to move beyond the current antiquated system. The net effect is anti-discrimination law reform in Queensland is overdue.

QLS would be pleased to discuss the staged implementation of this important reform agenda at the earliest opportunity as well as participate in the foreshadowed further targeted consultation process.

If you have any queries regarding the contents of this letter, please do not hesitate to contact our Legal Policy team via policy@qls.com.au or by phone on [REDACTED]

Yours faithfully



Genevieve Dee
President

Cc: The Hon Amanda Camm MP
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