



STARTTS

NSW Service for the Treatment
and Rehabilitation of Torture
and Trauma Survivors

NSW Service for the Treatment and Rehabilitation of Torture and Trauma Survivors

Submission to the Review of the *Anti- Discrimination Act 1977* (NSW)

20 August 2025

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1. About STARTTS

The NSW Service for the Treatment and Rehabilitation of Torture and Trauma Survivors (STARTTS) is a non-profit organisation established in 1988 to assist refugee survivors of torture and other trauma to rebuild their lives in Australia. STARTTS' services form a part of the NSW public health system through its status as an Affiliated Health Organisation (AHO), and is funded by government, non-government and philanthropic organisations, including NSW Health and the Commonwealth Departments of Health, Social Services and Home Affairs. STARTTS is the NSW member of the Forum of Australian Services for Survivors of Torture and Trauma (FASSTT), the network of Australia's eight specialist torture and trauma rehabilitation agencies.¹

STARTTS' clients are survivors of torture and trauma in the context of organised violence and state terrorism, the majority of whom arrived in Australia under the Refugee and Humanitarian Program or sought asylum after arriving. STARTTS' service model incorporates a large range of clinical and psychosocial interventions informed by the latest advances in neuroscience and evidence-based practice. Our service provision philosophy is predicated on a bio-psycho-social framework, in recognition of the complex interaction between this essential building block for personal and collective wellbeing, and pre-migration and 'normal life cycle' events post-settlement, which have the potential to impede recovery from traumatic experiences.¹ As such, our service offer is broad in scope and includes counselling and programs for all age groups; psychiatric assessment and interventions; family therapy; body-focused interventions (such as nutrition, massage, physiotherapy, acupuncture and pain management groups); support groups; youth activities; advocacy and policy input; and training for service providers.

Further information about STARTTS' services and programs can be found at <http://www.startts.org.au>.

2. Introduction

STARTTS welcomes the opportunity to provide a submission to the review of the *Anti-Discrimination Act 1977 (NSW) (ADA)*. We thank the NSW Law Reform Commission for its work in undertaking this review and commend the NSW Government for its commitment to ensuring that people living in NSW are adequately protected against discrimination, vilification, sexual harassment and victimisation.

STARTTS works with individuals and communities who frequently experience discrimination and vilification. Discrimination has been identified as a social determinant of health² and can be particularly detrimental to the mental health and wellbeing of refugees and people seeking asylum,³ many of whom have endured life-threatening persecution, torture, and other traumatic events due to their ethnicity, religion, political opinion, gender, sexual orientation, gender identity, sex characteristics, disability, and/or other attributes. Experiencing discrimination in Australia can therefore be triggering, lead to adverse mental health and resettlement outcomes, further compound inequality, and undermine the ability of people to recover from torture and other trauma related to their refugee experience.⁴ Negative perceptions of refugees in the community and online, as well as experiences of

¹ For more information, see FASSTT's website at <https://www.fasstt.org.au/>.

² A. Ziersch, C. Due, & M. Walsh, 'Discrimination: a health hazard for people from refugee and asylum-seeking backgrounds resettled in Australia,' *BMC Public Health*, vol. 20, no. 108, 2020, <https://bmcpublihealth.biomedcentral.com/articles/10.1186/s12889-019-8068-3>, accessed 28 July 2025.

³ *Ibid*, p. 10.

⁴ STARTTS, Australian Association of Social Workers, & NSW Refugee Health, 'Working with people from refugee backgrounds: A guide for social workers' (2022), p. 3, <https://www.startts.org.au/media/Working-with-people-from-refugee-backgrounds-A-guide-for-social-workers-2nd-Edition-2022.pdf>, accessed 24 July 2025.

discrimination and vilification, can also undermine the self-confidence of individuals and communities.⁵

As a specialist torture and trauma rehabilitation service, it would be outside STARTTS' expertise to provide a legal analysis on the technical operation or drafting of the ADA. Our contribution to this review instead draws on our clinical and community work and past consultations with frontline staff and clients to highlight the prevalence and deleterious impact of discrimination and vilification on refugees and people seeking asylum. Our submission takes an intersectional approach, recognising that 'intersecting forms of discrimination occur when a combination of two or more grounds interact with one another to produce distinct, unique and compounding experiences of discrimination.'⁶ As people with intersecting identities can be at a greater risk of experiencing particularly high levels of discrimination,⁷ STARTTS is supportive of recommendations for the ADA to recognise and protect against intersectional discrimination. We believe this would more accurately reflect the overlapping forms of discrimination experienced by the people with whom we work.

In principle, we support modernising and simplifying the language of the ADA and expanding the Act to recognise additional protected attributes. As outlined in this submission, STARTTS recommends that consideration is given to expanding the ADA to provide protections for the following attributes:

- sexual orientation, gender identity, and innate sex characteristics
- immigration status
- accommodation status
- religion.

At a minimum, we endorse recommendations, including by Anti-Discrimination NSW (ADNSW), that protections against discrimination, vilification, and harassment available to people living in NSW should be no less than those available at the federal level, or in other Australian jurisdictions.⁸

⁵ G. Doney, E. Pittaway, L. Bartolomei & K. Ward, 'The Glue that Binds' Social Capital in Refugee Communities Settling in Australia' (October 2013), STARTTS, UNSW, and the Centre for Refugee Research, https://www.arts.unsw.edu.au/sites/default/files/documents/The_Glue_that_Binds_Final_Report.pdf, accessed 28 July 2025

⁶ United Nations High Commissioner for Human Rights, 'Annual report of the United Nations High Commissioner for Human Rights and reports of the Office of the High Commissioner and the Secretary-General' (24 June 2024), A/HRC/57/67, <https://docs.un.org/en/A/HRC/57/67>, accessed 22 July 2025.

⁷ United Nations Network on Racial Discrimination and Protection of Minorities, 'Guidance note on intersectionality, racial discrimination & protection of minorities' (22 September 2022), p. 16, <https://www.ohchr.org/sites/default/files/documents/issues/minorities/30th-anniversary/2022-09-22/GuidanceNoteonIntersectionality.pdf>, accessed 23 July 2025.

⁸ See Anti-Discrimination NSW, 'Anti-Discrimination NSW Submission to the NSW Law Reform Commission Anti-Discrimination Act Review' (October 2023), p. 3, https://lawreform.nsw.gov.au/documents/Current-projects/ada/preliminary_submissions/PAD83.pdf, accessed 21 July 2025.

3. Discrimination and vilification experienced by people from refugee and asylum seeking backgrounds

Refugees, people seeking asylum, and others from refugee-like backgrounds frequently experience discrimination and vilification, including in employment,⁹ accommodation,¹⁰ public transport, educational facilities,¹¹ online, in the media,¹² when interacting with law enforcement and the justice system, and in other areas of public life. This discrimination is often intersectional, occurring on the basis of multiple attributes including race, ethnicity, religion, gender, disability, gender identity, sexual orientation, sex characteristics, accommodation status, and/or immigration visa status. As stated by participants of one STARTTS program:

“It’s hard to believe that they talk about this [multiculturalism] and at the same time they discriminate against people from other countries. We have lots of barriers to find employment, to buy a house and to adapt to Australia...”

“... it’s very difficult to come to this country and feel you are not part of it, you are treated differently because you are different.”¹³

STARTTS and other FASSTT agencies have previously conducted consultations with staff and clients on racism and the direct and indirect forms of discrimination that many people from refugee and asylum seeking backgrounds experience. Although safe and secure housing is vital for refugees to regain a sense of safety, stability and security,¹⁴ it is common for them to experience multiple forms of discrimination in the rental market. This can have profoundly harmful impacts on the psychological wellbeing of individuals and families who have experienced years of displacement. Discrimination in employment is also a common occurrence. For example, some community members reported they experienced difficulties securing employment until they used Anglo-Saxon names on their resumes. Another participant advised they were told they were ‘taking jobs from Australians’ and should return to their country of origin. The negative impacts of such discrimination is often intensified by past traumatic experiences in their home country.

Several studies have also examined the prevalence and impact of these experiences among refugee communities. One study of the longitudinal predictors of wellbeing among a cohort of refugee youth in Melbourne found that perceived discrimination significantly and independently decreased self-reported rates of happiness and health, with the adverse impacts of discrimination persisting over

⁹ M. Segrave et al., ‘Migrant and refugee women: A national study of experiences of, understandings of and responses to sexual harassment in the workplace’ (August 2024), ANROWS, https://anrows-2019.s3.ap-southeast-2.amazonaws.com/wp-content/uploads/2024/08/19203606/ANROWS_Segrave_Migrant_Refugee_Sexual_Harassment_REPORT_2024.pdf, accessed 11 August 2025.

¹⁰ A. Ziersch, N. Loehr, & K. Miller, ‘Discrimination in the private rental market in Australia: large families from refugee backgrounds,’ *Housing Studies*, vol. 11, 2022, <https://www.tandfonline.com/doi/full/10.1080/02673037.2023.2238626#d1e185>, accessed 11 August 2025.

¹¹ Ethnic Communities Council of Queensland, ‘Report: Racism in Australian schools’ (February 2024), <https://eccq.com.au/wp-content/uploads/2024/02/Report-Racism-Within-Australian-Schools.pdf>, accessed 11 August 2025.

¹² F. Macdonald, ‘Positioning young refugees in Australia: media discourse and social exclusion,’ *International Journal of Exclusive Education*, vol. 21, no. 11, 2017, <https://www.tandfonline.com/doi/full/10.1080/13603116.2017.1350324>, accessed 24 July 2025.

¹³ STARTTS, ‘Families in Cultural Transition Evaluation Report’ (2022), pp. 28-29, <https://www.startts.org.au/media/startts-report-fict-refugee-trauma-2022.pdf>, accessed 26 July 2025.

¹⁴ A. Ziersch, N. Loehr, & K. Miller, ‘Discrimination in the private rental market in Australia: large families from refugee backgrounds,’ *Housing Studies*, vol. 11, 2022, <https://www.tandfonline.com/doi/full/10.1080/02673037.2023.2238626#d1e185>, accessed 11 August 2025.

time.¹⁵ Another study of the experiences of refugees and people seeking asylum in South Australia found that those who faced discrimination had significantly worse mental health than those who did not, reporting a fractured sense of security and belonging, lower levels of trust, and a reduced sense of control.¹⁶ The study found that discrimination seemed to ‘particularly occur at the intersections of immigration status, race/ethnicity, religion and gender.’¹⁷ For example, some women who wear hijabs shared overlapping experiences of discrimination based on their religion, culture, and gender. Young men who participated in the study described intersecting forms of discrimination due to their religion, ethnicity, and country of origin. The study also revealed a reluctance among some participants to acknowledge and discuss experiences of discrimination, including due to fear that doing so would impact their visa application.¹⁸ This indicates that the rate of discrimination among refugees and people seeking asylum is likely higher than such studies suggest, which is consistent with our direct experience working with these communities.

4. Additional protections

STARTTS suggests that the list of attributes protected from discrimination in the ADA could be expanded to include other protected attributes, such as sexual orientation, gender identity, and innate sex characteristics; immigration status; accommodation status; and religion.

4.1 Sexual orientation, gender identity, and innate sex characteristics

STARTTS works with many people from refugee, asylum seeking, or refugee-like backgrounds who have diverse bodies, genders, sexualities, relationships, and families through our LGBTQIA+ Project, [Walk On Walk Strong](#).¹⁹ Through our work, we know that they often experience multiple forms of discrimination based on several attributes, including (but not limited to) their race, ethnicity, age, immigration or visa status, religion, disability, health status, gender, gender identity, gender expression, sex characteristics, and/or sexual orientation.²⁰ This is substantiated by research conducted by the Forcibly Displaced People Network (FDPN), a non-profit organisation that advocates for LGBTQIA+ people who have been forced to leave the countries they were living in due to persecution based on their sexual orientation, gender identity, gender expression, and sex characteristics.²¹ FDPN’s research found that:

¹⁵ I. Correa-Velez, S. Gifford, & C. McMichael, ‘The persistence of predictors of wellbeing among refugee youth eight years after resettlement in Melbourne, Australia,’ *Social Science and Medicine*, vol. 142, 2015, <https://www.sciencedirect.com/science/article/abs/pii/S0277953615300691>, accessed 28 July 2025.

¹⁶ A. Ziersch, C. Due, & M. Walsh, ‘Discrimination: a health hazard for people from refugee and asylum-seeking backgrounds resettled in Australia,’ *BMC Public Health*, vol. 20, no. 108, pp. 4-5, <https://bmcpublikealth.biomedcentral.com/articles/10.1186/s12889-019-8068-3>, accessed 24 July 2025

¹⁷ *Ibid*, p.5.

¹⁸ *Ibid*, p. 9.

¹⁹ STARTTS, ‘LGBTQIA+ Project,’ <https://www.startts.org.au/services/lgbtqia-project/>, accessed 19 July 2025.

²⁰ Forcibly Displaced Peoples Network, ‘Inhabiting Two Worlds at Once: Report into LGBTQIA+ Settlement Outcomes’ (2024), p. 12, <https://fdpn.org.au/wp-content/uploads/2023/10/inhabiting-two-worlds-report-into-lgbtqia-settlement-outcomes-fdpn-colour.pdf>, accessed 19 July 2024.

²¹ For more information, see the Forcibly Displaced People Network’s website at <https://www.fdpn.org.au/about/>.

- Up to 67% of forcibly displaced²² LGBTQIA+ participants experienced discrimination when accessing support services in Australia.²³
- Discrimination within the health system affected 33% of participants and included racism, misgendering, and homophobia.
- 51.2% of participants experienced discrimination in employment, with intersectional discrimination based on their race and LGBTQIA+ identity common.²⁴
- Discrimination in housing affected approximately 50.8% of participants, which included experiences encompassing racism, homophobia, and transphobia.
- 69% of participants had experienced LGBTQIA+ discrimination, 85% of participants had experienced racism and migration status based discrimination, and 15% had experienced ableism.²⁵

Despite the high rates of sexuality and gender identity based discrimination faced by LGBTQIA+ refugees and people seeking asylum, we note that the number of discrimination complaints on ‘homosexuality’ or ‘transgender’ grounds are low, accounting for just 1.6% and 1.7% respectively of the complaints received by ADNSW in 2023-24.²⁶ FDPN’s study identified several barriers to reporting discrimination, including a fear of repercussions, not being aware of the remedies available, and concerns reporting could impact their visa status.²⁷ Participants also expressed concern that complaints often yield no change or negative outcomes.²⁸ As it stands, we are concerned that the narrow wording of the ADA – ‘homosexual’ and ‘transgender persons’ – is outdated and does not provide adequate protections for everyone experiencing discrimination based on their sexual orientation, gender identity, or innate variations in their sex characteristics. It is important that the ADA adequately protects against vilification and discrimination for *all* LGBTQIA+ people, including those who are bisexual, queer, non-binary, intersex and/or asexual. We endorse recommendations made by FDPN for state anti-discrimination protections to be expanded to ensure better protections for this group.²⁹

4.2 Immigration status

STARTTS supports the inclusion of ‘immigration status’ as a protected attribute, in line with protections available in the Australian Capital Territory and Northern Territory. Through our work, we have

²² In this context, the term ‘forcibly displaced’ refers to people seeking asylum, refugees, and migrants from non-Western countries who cannot live safely in their country of origin due to their LGBTQIA+ status and subsequent discrimination, persecution, and violence. See Forcibly Displaced People Network, ‘Inhabiting Two Worlds At Once, Report into LGBTQIA+ Settlement Outcomes’ (2023), p. 9, <https://www.fdpn.org.au/wp-content/uploads/2024/02/inhabiting-two-worlds-report-into-lgbtqia-settlement-outcomes-fdpn-colour.pdf>, accessed 28 July 2025.

²³ Forcibly Displaced People Network, ‘Inhabiting Two Worlds At Once, Report into LGBTQIA+ Settlement Outcomes’ (2023), p. 12, <https://www.fdpn.org.au/wp-content/uploads/2024/02/inhabiting-two-worlds-report-into-lgbtqia-settlement-outcomes-fdpn-colour.pdf>, accessed 28 July 2025.

²⁴ Ibid, p. 10.

²⁵ Ibid.

²⁶ Anti-Discrimination NSW, ‘Annual report 2023-24’, [https://antidiscrimination.nsw.gov.au/documents/annual-reports/Anti-Discrimination NSW - Annual Report 2023-24 under s 122 of the Anti-Discrimination Act.pdf](https://antidiscrimination.nsw.gov.au/documents/annual-reports/Anti-Discrimination%20NSW%20-%20Annual%20Report%202023-24%20under%20s%20122%20of%20the%20Anti-Discrimination%20Act.pdf), accessed 11 August 2025.

²⁷ Forcibly Displaced People Network, ‘Inhabiting Two Worlds at Once, Report into LGBTQIA+ Settlement Outcomes’ (2013), p. 11, <https://www.fdpn.org.au/wp-content/uploads/2024/02/inhabiting-two-worlds-report-into-lgbtqia-settlement-outcomes-fdpn-colour.pdf>, accessed 28 July 2025.

²⁸ Ibid.

²⁹ Forcibly Displaced People Network, ‘Inhabiting Two Worlds At Once, Report into LGBTQIA+ Settlement Outcomes’ (2023), p. 12, <https://www.fdpn.org.au/wp-content/uploads/2024/02/inhabiting-two-worlds-report-into-lgbtqia-settlement-outcomes-fdpn-colour.pdf>, accessed 28 July 2025.

witnessed that people seeking asylum and others on temporary visas routinely face discrimination due to their visa and/or immigration status across a range of contexts, including in accommodation, employment, and other areas of public life. Clients have reported that some accommodation providers have expressed that they do not want to rent to or accommodate people seeking asylum, even in circumstances where having a temporary visa was irrelevant (such as in hostels and boarding facilities). Similarly, people on bridging visas with full work rights report being declined employment opportunities due to their immigration status, despite it posing no legal or practical barrier to their work. These experiences have been reported in the literature, with a participant of one study stating that:

*“They [potential employers] ask me what kind of visa I’m on, and when I say bridging visa, they say to me ‘have a good day, bye’”.*³⁰

While we acknowledge that some employers and landlords may have genuine concerns about employing or renting to someone holding a visa without work rights, or a very short-term bridging visa, we believe these circumstances should be managed through exemptions, not the absence of protections altogether.

4.3 Accommodation status

STARTTS endorses recommendations for accommodation status to be a protected attribute, in line with the Australian Capital Territory and Northern Territory. In its review of *Queensland’s Anti-Discrimination Act 1991*, we also note that the Queensland Human Rights Commission recommended that homelessness be included as a protected attribute (a proposal which was supported in-principle by the government at the time).³¹ We believe this reflects a growing recognition of the harms caused by discrimination based on accommodation status.

Many people seeking asylum and refugees experience primary and secondary forms of homelessness. For example, approximately 20% of people sleeping rough in Sydney’s central business district are non-residents, which includes people seeking asylum,³² and 55% of people seeking asylum who were surveyed by the Jesuit Refugee Service and Western Sydney University reported experiencing homelessness at some point since arriving to Australia.³³ As the Law Reform Commission of Western Australia heard in its 2022 review of the *Equal Opportunity Act 1984 (WA)*, people experiencing homelessness face a range of ‘structural disadvantages, including being denied employment, missing out on housing opportunities, as well as stigma and prejudice’ due to their accommodation status.³⁴ People seeking asylum and refugees experiencing homelessness or living in precarious housing arrangements already face multiple, intersecting forms of discrimination when trying to secure stable

³⁰ A. Ziersch, C. Due, & M. Walsh, ‘Discrimination: a health hazard for people from refugee and asylum-seeking backgrounds resettled in Australia,’ *BMC Public Health*, vol. 20, no. 108, 2020, p. 7, <https://bmcpublihealth.biomedcentral.com/articles/10.1186/s12889-019-8068-3>, accessed 24 July 2025.

³¹ Queensland Government, ‘Final Queensland Government response to the Queensland Human Rights Commission’s report, Building Belonging – Review of Queensland’s Anti-Discrimination Act 1991’ <https://www.publications.qld.gov.au/ckan-publications-attachments-prod/resources/c0fd9b56-1086-4a1e-87e1-81b4a9aae7aa/final-queensland-government-response-building-belonging-report.pdf?ETag=3849a5d660181d59a9986b931ae69af8>, accessed 7 August 2025.

³² Homelessness NSW, ‘The experience of people without Australian permanent residency accessing emergency accommodation in inner city Sydney’ (December 2021), p. 6, <https://homelessnessnsw.org.au/wp-content/uploads/2021/12/Final-Report-People-without-PR-accessing-EA94.pdf>, accessed 24 July 2025.

³³ Jesuit Refugee Service & the Translational Health Research Institute, Western Sydney University, ‘A place to call home survey findings’ (August 2021), <https://aus.jrs.net/wp-content/uploads/sites/20/2021/08/A-Place-to-Call-Home-Survey-Findings.pdf>, accessed 16 July 2025.

³⁴ Law Reform Commission of Western Australia, ‘Review of the Equal Opportunity Act 1984 (WA)’ (May 2022), https://www.wa.gov.au/system/files/2022-08/LRC-Project-111-Final-Report_0.pdf, accessed 7 August 2025.

accommodation and employment. Discrimination based on accommodation status can further compound these challenges and create additional barriers to social and economic participation and accessing essential services and healthcare.

4.4 Religion

We note that the definition of ‘race’ in the ADA includes ‘ethnoreligious origin.’ While ethnoreligious origin was originally intended to include Muslims – and ADNSW notes that wearing a hijab ‘may, in some circumstances, be considered characteristic of women of certain ethno-religious origins’³⁵ – this has been inconsistently applied in practice.³⁶ As the ADNSW notes, these factors ‘reduce the ability for Muslims to seek redress for racial discrimination and vilification’ and means ADNSW is unable to provide consistent advice to Muslim communities on where and when the ADA might apply.³⁷ As such, we recommend that discrimination provisions in the ADA are revised or clarified to ensure Muslim communities have access to protections and remedies under the law.

5. Accessibility of complaint mechanisms

As highlighted by the Justice and Equity Centre (formerly the Public Interest Advocacy Centre (PIAC)), a common criticism of Australia’s anti-discrimination laws is that the burden is placed on people who have experienced discrimination to lodge complaints in order to obtain a remedy.³⁸ This process can worsen existing disadvantage, given the power imbalance that is often present between victims and those responsible for discrimination, including unequal access to legal and financial support.³⁹ These challenges are even greater for refugees and people seeking asylum, particularly those who speak languages other than English, have developing levels of digital literacy, and/or who do not have support to lodge a complaint. In addition, STARTTS notes that the ADA requires complaints to be made in writing.⁴⁰ This may prevent some people from proceeding with a complaint,⁴¹ as many people from refugee and asylum seeking backgrounds cannot read or write in the language/s they speak and may not have a support person or representative available to assist them. Due to these difficulties and the potentially retraumatising nature of reporting discrimination on top of the everyday stressors they face, refugees and people seeking asylum need to be supported during and after they disclose experiences of discrimination. Adequate resourcing and assistance are essential to ensure they too can access complaint mechanisms and the support they need to navigate the process.

Consultations with clients and staff have found that many people from refugee and asylum seeking backgrounds are also not aware of their rights or the complaint mechanisms available to them. If legal

³⁵ Anti-Discrimination NSW, ‘Early childhood educator told to remove hijab’ (18 June 2025), <https://antidiscrimination.nsw.gov.au/complaints/complaint-case-studies/race-discrimination-/early-childhood-educator-told-to-remove-hijab.html>, accessed 25 July 2025.

³⁶ Anti-Discrimination NSW, ‘Anti-Discrimination NSW Submission to the Australia Law Reform Commission’s Inquiry into Religious Educational Institutions and Anti-Discrimination Laws’ (3 March 2023), <https://antidiscrimination.nsw.gov.au/documents/submissions/412.-Anti-Discrimination-NSW.pdf>, accessed 24 July 2025.

³⁷ Anti-Discrimination NSW, ‘Anti-Discrimination NSW Submission to the NSW Law Reform Commission Anti-Discrimination Act Review’ (October 2023), p. 9, https://lawreform.nsw.gov.au/documents/Current-projects/ada/preliminary_submissions/PAD83.pdf, accessed 25 July 2025.

³⁸ Justice and Equity Centre, ‘Leader to Laggard: The case for modernising the NSW Anti-Discrimination Act (August 2021), p. 13, <https://jec.org.au/wp-content/uploads/2021/08/PIAC-Leader-to-Laggard-The-case-for-modernising-the-NSW-Anti-Discrimination-Act.pdf>, accessed 31 July 2025.

³⁹ Ibid.

⁴⁰ *Anti-Discrimination Act 1977* (NSW), s89.

⁴¹ Anti-Discrimination NSW, ‘Submission to the NSW Law Reform Commission Anti-Discrimination Act Review’ (October 2023), p. 17, https://lawreform.nsw.gov.au/documents/Current-projects/ada/preliminary_submissions/PAD83.pdf, accessed 10 July 2025.

practitioners who are familiar with the ADA can find its structure confusing,⁴² then it is likely to be even more difficult for people who do not have a legal background to navigate, particularly those who speak languages other than English. We agree with the ADNSW that a clearer and more accessible ADA, written in plain English, would better assist people to understand their rights and obligations.⁴³ This should be accompanied by in-language resources in different formats. We note that ADNSW has demonstrated a commitment to making its services and complaints processes accessible to people from refugee backgrounds, including through the launch of online complaints forms and information in several community languages.⁴⁴ We commend this work and would welcome the expansion of these resources into additional languages, translated by qualified translators and made available in multimedia formats to further improve accessibility. Language resources should be accompanied by strong community outreach and engagement and co-designed by groups vulnerable to (or with lived experience of) discrimination and vilification.

⁴² Ibid, p. 14.

⁴³ Ibid.

⁴⁴ Anti-Discrimination NSW, '2022-23 Anti-Discrimination Annual Report,' [https://antidiscrimination.nsw.gov.au/documents/annual-reports/2022-23 Anti Discrimination Annual Report.pdf](https://antidiscrimination.nsw.gov.au/documents/annual-reports/2022-23%20Anti%20Discrimination%20Annual%20Report.pdf), accessed 12 August 2025.

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