ssi For equality of life.

Secretariat Support
Strategic Review of the Queensland Human Rights Commission (QHRC)
c/- Office of the Deputy Director-General, Corporate Services
GPO Box 149
BRISBANE QLD 4001

30 October 2026

Dear Secretariat,

Settlement Services International (SSI) welcomes the opportunity to respond to the Discussion Paper for the Review of Queensland's human rights and anti-discrimination framework. SSI is a national not-for-profit that has supported communities for more than 25 years. Beginning as a refugee resettlement provider, SSI has expanded its services while retaining deep expertise in working with people from diverse cultural and linguistic backgrounds. Today, SSI works with refugees and other humanitarian entrants, migrants, culturally and linguistically diverse communities, children and families, people living with disability, Aboriginal and Torres Strait Islander communities and LGBTIQA+ communities. In 2024–25, SSI supported more than 53,000 people through almost 60 programs and community-based services nationally.

Alongside service delivery, SSI seeks to influence the systems, laws and policies that create inequities and limit opportunity. Our work with refugee, migrant and multicultural communities provides practical insight into the barriers people can experience when navigating institutions, accessing services and exercising their rights. SSI supports a strong, accessible and preventative human rights and anti-discrimination framework that makes rights meaningful in practice, including for communities experiencing racism, language barriers and intersecting forms of disadvantage.

Accessible complaints and effective remedies (A20–A32; B13)

SSI supports reforms that make complaints and remedies easier to access. Requirements such as making a complaint in writing, approaching a public entity first and navigating different processes under the Human Rights Act and Anti-Discrimination Act can create additional barriers for people with limited English, limited familiarity with Australian institutions or low trust in formal systems. The Review should simplify and align complaint pathways, enable flexible and supported ways to make complaints, and ensure reasonable timeframes for people to seek redress. Where a human rights complaint is unresolved, public entities should be required to formally respond to QHRC recommendations. Remedies should be practical and effective, so that protection of human rights does not depend on an individual's capacity to navigate complex legal processes.

Maintain public entity obligations and strengthen prevention (B12; C12–C17)

SSI supports retaining meaningful obligations on public entities to act compatibly with human rights and properly consider relevant rights when making decisions. These duties help shift the framework from responding to harm after it occurs towards preventing harm through better policy, service design and administrative decision-making.

SSI also supports a preventative approach to discrimination. The proposed positive duty for organisations and businesses to take reasonable and proportionate steps to prevent discrimination, harassment and other unlawful conduct should be accompanied by clear guidance and an effective regulatory role for the QHRC. Expanded powers to investigate systemic discrimination would help address patterns of harm that cannot be adequately resolved through individual complaints alone.

Recognise intersectional discrimination and strengthen protections (B2; C4–C9; C19–C22)

SSI supports stronger recognition of the ways discrimination can occur across a combination of attributes. For migrant and refugee communities, race, religion, gender, disability, age, migration-related circumstances and socioeconomic disadvantage can interact and compound barriers to safety, services

and participation. Recognition of discrimination based on a combination of attributes is therefore important.

SSI also supports stronger protections for people experiencing disadvantage, including proposed attributes relating to homelessness and subjection to domestic or family violence. The Review should also consider additional positive human rights, including adequate housing and freedom from gender-based violence. Unlike protections that primarily require government to refrain from interference, positive rights require practical action to make those rights accessible. Strong and workable protections against vilification are also essential to a framework capable of responding to racism and discrimination.

An accessible and capable Queensland Human Rights Commission (Part A)

The effectiveness of these reforms will depend on an accessible and appropriately empowered QHRC. SSI supports a Commission able to provide education and guidance, engage with diverse communities, facilitate early resolution, identify systemic issues and support compliance. Information about rights and complaints should be available in plain language, translated and accessible formats, with culturally responsive assistance and engagement through trusted community organisations.

Recommendations

SSI recommends that the Review:

- simplify and improve the accessibility of complaint pathways and remedies, particularly for people experiencing language, cultural and institutional barriers;
- retain strong human rights obligations on public entities and strengthen preventative duties across Queensland's anti-discrimination framework;
- ensure the QHRC has appropriate powers and capacity to address systemic discrimination through investigation, regulation, education and guidance;
- recognise intersectional discrimination and retain or strengthen protections relevant to people experiencing homelessness, domestic or family violence and other intersecting forms of disadvantage; and
- ensure implementation of reforms is culturally responsive and developed in genuine partnership with multicultural, migrant and refugee communities.

SSI welcomes the opportunity to discuss the matters raised in this submission further and would be happy to provide any additional information that may assist the Review.

Sincerely,

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