

## **PUBLIC SECTOR BILL 2022**

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# Public Sector Bill 2022

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Submission to  
Economics and Governance Committee

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# Summary and recommendations

1. Thank you for the opportunity to make submissions on the Public Sector Bill 2022 (**the Bill**). We note that the Committee is also considering the Integrity and Other Legislation Amendment Bill 2022, but the Queensland Human Rights Commission (**QHRC**) does not seek to make a submission in relation to that Bill.
2. This submission considers two aspects of the Bill:
  - a. positive duties to eliminate discrimination; and
  - b. application of the powers of the Public Sector Commissioner to the QHRC as an independent agency tasked with reviewing the government's compatibility with human rights.
3. The QHRC **recommends** that
  - a. In relation to Chapter 2 of the Bill:
    - i. The wording of the positive duties be strengthened to meet the purposes of the Chapter, and to ensure that the Queensland Government is leading the way in promoting substantive, rather than only formal, equality.
    - ii. The phrase 'ensure people...are able to' in clause 27(b) be replaced with an active and imperative requirement.
    - iii. The 'diversity target groups' be expanded, in particular to ensure that equity and diversity measures in government agencies are in place for LGBTIQ+ employees.
  - b. In relation to the powers of the Public Sector Commissioner, that clause 254 of the Bill be amended to exclude the QHRC from a public sector review.

## Introduction

4. The QHRC is a statutory authority established under the Queensland *Anti-Discrimination Act 1991* (the **AD Act**).
5. The QHRC has functions under the AD Act and the *Human Rights Act 2019* (the **HR Act**) to promote an understanding and public discussion of human rights in Queensland, and to provide information and education about human rights.
6. The QHRC also deals with complaints of discrimination, vilification, and other objectionable conduct under the AD Act, reprisal under the *Public Interest Disclosure Act 2009*, and human rights complaints under the HR Act.

# Equity, diversity, respect, and inclusion

7. Chapter 2 of the Bill contains a purpose clause, which states that the purposes of this chapter are to ensure that public sector agencies:
  - develop diverse workforces in the public sector
  - actively progress equity and diversity, including actively progressing gender pay equity
  - can demonstrate equal conditions of employment and equality in access to opportunities and leadership
  - foster respectful and inclusive workplaces
  - create workplaces free from unlawful discrimination.<sup>1</sup>
8. These purposes align with the recommendations of the QHRC's recent *Building Belonging* report on its review of discrimination law in Queensland.<sup>2</sup> In the report, the QHRC recommended a shift in focus towards preventative measures to address systemic discrimination and promote substantive equality. The report is currently with the government for their response.
9. The QHRC supports the purposes of the Public Sector Bill and the inclusion of positive duties to ensure a more proactive approach to achieving equity and inclusion. However, the QHRC submits that some definitions included in the Bill require further consideration.

## Actively progressing gender pay equity

10. Clause 24(2) defines the meaning of 'actively progressing gender pay equity' as including taking measures to achieve:
  - equal remuneration for work of equal or comparable value
  - equity for women in employment conditions
  - equity in women's access to working arrangements and employment and development opportunities.
11. The measures required of public sector agencies to address pay equity should take account of underlying issues in the specific context of the Queensland public sector, based on the evidence available. While not necessarily the case in the private sector, women working in the Queensland public sector are guaranteed the same pay and conditions when working in the same positions as men. Therefore, the measures included in this definition only restate the minimum already required by the Queensland Employment Standards in the *Industrial Relations Act 2016*<sup>3</sup> and in collective agreements.

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<sup>1</sup> Public Sector Bill 2022 (Qld) cl 24.

<sup>2</sup> Queensland Human Rights Commission, *Building Belonging: Review of Queensland's Anti-Discrimination Act 1991* (Report, July 2022).

<sup>3</sup> *Industrial Relations Act 2016* (Qld) ch 2 pt 3.

12. However, based on gender pay equity statistics, the gender pay gap in the public sector appears to be linked to an over-representation of women in temporary, casual, and part-time work.<sup>4</sup>
13. Noting that the measures are included as a non-exhaustive list in Clause 24(2), the QHRC suggests that addressing the gender pay gap requires taking additional active steps beyond reinforcing existing minimum requirements.

## Positive duties

14. Having identified the limitations inherent in a reactive system, the QHRC's *Building Belonging* report recommended a positive duty to eliminate discrimination to apply to all duty holders under the Act. This would include the Queensland Government as an employer.
15. Chapter 2 of the Bill contains two positive duty clauses, clause 27 and clause 33, including to eliminate unlawful discrimination in the entity in relation to employment matters.<sup>5</sup>
16. Public sector agencies would be required to take action to create equity and diversity plans, conduct equity and diversity audits, and report on an annual basis.<sup>6</sup>
17. The Explanatory Notes envisage that the Bill will be implemented as follows:

...equity and diversity audits and reports will inform the entity's equity and diversity plan, which will in turn be the subject of subsequent equity and diversity audits and reports. The intent is to create an ongoing program of planning, verification and evaluation within each prescribed entity to improve equity and diversity in employment matters.<sup>7</sup>
18. Equity, diversity, respect, and inclusion also become considerations in the selection and recruitment process. Chapter 3 of the Bill requires that selection processes reflect the obligations set out under chapter 2 in regard to equity, diversity, respect, and inclusion.
19. The inclusion of positive duties on public sector entities set out in clauses 27 and 33 is an encouraging development. While many agencies already take steps to address equity and diversity, the QHRC considers that making this a requirement will ensure that promoting equity and diversity becomes a priority for agencies.

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<sup>4</sup> Office of the Special Commissioner, Equity and Diversity (Qld), 'Queensland public sector Gender pay equity dashboard (Web page, 2021).

<sup>5</sup> Public Sector Bill 2022 (Qld) cl 27(c).

<sup>6</sup> Public Sector Bill 2022 (Qld) cls 28–29.

<sup>7</sup> Explanatory Notes, Public Sector Bill 2022 (Qld) 20.

20. The acknowledgement that employees may be members of ‘1 or more diversity target groups’<sup>8</sup> also aligns with the proposed reforms to the definition of discrimination in the *Building Belonging* report, which recommended that a person should be able to complain about discrimination on the basis of ‘combined grounds’.<sup>9</sup>
21. In the QHRC’s view, the Bill complements the proposed reforms to the AD Act recommended in the *Building Belonging* report. Taking positive measures is also consistent with and promotes the right to equality under the HR Act.<sup>10</sup> The many benefits of promoting diversity and inclusion in the workplace include increased productivity, improved staff retention and job satisfaction, and reduced health and safety risks.<sup>11</sup>
22. Nonetheless, the QHRC is of the view that the wording of the positive duties should be strengthened to meet the purposes of Chapter 2, and to ensure that the Queensland Government is leading the way in promoting substantive, rather than only formal, equality.

### Promoting equity and diversity

23. Clause 27(b) states that reasonable action must be taken to ensure that members of diverse groups ‘are able to pursue careers, compete for recruitment, selection and promotion opportunities’ (emphasis added). Merely asserting the ‘ability’ of a person to pursue their career and opportunities is no more than restating the status quo. Any person may technically be ‘able to’ apply for work currently, but some marginalised groups encounter barriers in applying for and obtaining work in the public sector. Without acknowledging and addressing these barriers, this duty as currently stated is unlikely to result in meaningful outcomes.
24. The wording of clause 27(b) also waters down the current EEO (equal employment opportunity) obligation in the *Public Service Act 2008* that requires public sector agencies to ‘enable’ members of the EEO target groups to compete for recruitment, selection, promotion and transfer and to pursue careers ‘as effectively as people who are not members of those groups.’<sup>12</sup> Aside from the word ‘enable’, alternative words to ensure the purposes of the chapter are achieved may include ‘empowered’ or ‘supported’.

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<sup>8</sup> Public Sector Bill 2022 (Qld) cl 27(b).

<sup>9</sup> Queensland Human Rights Commission, ‘Discrimination on combined grounds’ *Building Belonging: Review of Queensland’s Anti-Discrimination Act 1991* (Report, July 2022) 103–110, and Recommendation 3.3.

<sup>10</sup> *Human Rights Act 2019* (Qld) s 15.

<sup>11</sup> See for example McKinsey & Company, *Diversity wins: how inclusion matters* (Report, May 2020).

<sup>12</sup> *Public Service Act 2008* (Qld) s 30(2).

## Diversity target groups

### Target groups

25. Equal opportunity measures in the public sector were first introduced in March 1992.<sup>13</sup> The same ‘target groups’ in the 1992 legislation were included as ‘EEO target groups’ in the *Public Service Act 2008*. In effect, these same target groups have carried over into the current Bill as ‘diversity target groups.’ While legislation passed in 1992 and 2008 included the possibility of additional target groups being prescribed by regulation, the QHRC understands this has not occurred.
26. The QHRC urges the government to consider whether the target groups that were first included in legislation 30 years ago should be expanded, and, in particular, whether the Bill should ensure that equity and diversity measures are in place for LGBTIQ+ employees.

### LGBTIQ+ employees

27. As stated in the current Queensland public sector LGBTIQ+ inclusion strategy, ‘the public sector has a unique opportunity and responsibility to make a positive contribution to LGBTIQ+ inclusion.’<sup>14</sup>
28. In 2021, one in three (out of over 80,000) public sector respondents to the Working for Queensland Survey indicated that sexual orientation is a barrier to success in their organisation.<sup>15</sup> The survey did not ask about gender identity in 2021.
29. Research across public and private sectors indicates that LGBTIQ+ employees, and particularly trans and gender diverse employees, experience barriers to inclusion in employment. Nearly 10% of respondents to the Australian *Private Lives 3* study reported being refused employment or promotion in the last 12 months on the basis of sexuality or gender identity discrimination.<sup>16</sup> Around 1 in 3 LGBTIQ+ employees hide their identity to at least some staff at work, and this subterfuge has been linked to higher rates of depression, low job satisfaction, and reduced work performance.<sup>17</sup> The 2020 Australian Workplace Equality Index employee survey of over 33,000 employees showed that only 47.4% of trans and

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<sup>13</sup> *Equal Opportunity in Public Employment Act 1992* (Qld).

<sup>14</sup> Public Service Commission (Qld), ‘Queensland Public Sector LGBTIQ+ Inclusion Strategy 2017–2022: a strategy for sexual orientation, gender diversity and intersex inclusion’ (Web Page, 2017) 4.

<sup>15</sup> Queensland Government, ‘Working for Queensland Survey: Highlights report – Queensland public sector’ (Web Page, 2021) 7.

<sup>16</sup> Adam Hill et al., *Private Lives 3: The Health and Wellbeing of LGBTIQ people in Australia*. (La Trobe University, 2020) 40.

<sup>17</sup> Diversity Council Australia, ‘*Out At Work: From Prejudice to Pride*’ (Web page, 2018).



gender diverse employees reported feeling safe and included in their immediate team and 63.9% felt mentally well at work.<sup>18</sup>

30. In the QHRC's experience with handling enquiries and complaints about sexuality and gender identity discrimination, specific measures may be necessary to ensure genuine inclusion of LGBTIQ+ employees, as distinct from other diversity target groups.
31. Chapter 2 of the Bill refers to people with diverse sexual orientations, gender identities, or intersex variations as an example of a group that is not a diversity target group.<sup>19</sup> By referring to LGBTIQ+ employees, the Bill signals that public sector agencies need to give particular consideration to LGBTIQ+ employees when planning for equity and diversity and in creating a culture of respect and inclusion. However, because this group is not included as a diversity target group, it is unclear how effective the outcomes will be for this cohort.
32. The Bill requires that equity and diversity planning *must* include the establishment of objectives, strategies and targets for the target groups (section 28(2)) but only *may* consider matters relevant to other groups (section 28(5)).<sup>20</sup> Equity and diversity reporting is linked to an annual audit, which would include information gathered about the composition of the entity's workforce. While it is not clear what this 'composition' refers to, considering the current reporting pressures on government agencies, many agencies are only likely to report on the statistics for the diversity target groups. In the absence of an audit and reporting requirement, many agencies are unlikely to prioritise the strategies necessary to progress equity, diversity, and inclusion specific to LGBTIQ+ employees.
33. The QHRC recommends that the Bill be amended to include people with diverse sexual orientations, gender identities, or intersex variations as a diversity target group.

## Independent role of the QHRC

34. Clause 254 of the Bill provides that the Minister or the council (a **referring entity**) may ask a **reviewing entity** to conduct a public sector review. Under clause 257, the reviewing entity has powers including entering the official premises of the

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<sup>18</sup> Dawn Hough, 'How Inclusive Are Our Workplaces of Trans and Gender Diverse Employees?' *Australian Workplace Equality Index* (Web Page, 2 September 2020).

<sup>19</sup> Three clauses refer to groups of employees that are not diversity target groups, providing the same example in each instance of people with diverse sexual orientations, gender identities or intersex variations. Clause 28 confirms that an equity and diversity plan can also address matters about other groups, and clause 32 states that a culture of inclusion includes the experiences and perspectives of groups other than the diversity target groups. Clause 33 confirms that a chief executive must ensure training programs, policies and practices promote a culture of respect and inclusion, and such measures may also be included in the agency's equity and diversity plan.

<sup>20</sup> Public Sector Bill 2022 (Qld) cl 28(2), (5).

public sector entity, requiring the production of documents, and interviewing employees. The chief executive of a public sector entity and each other person employed in the public sector entity must provide the assistance reasonably required by the reviewing entity to conduct the public sector review, including, for example, giving the reviewing entity an official document required.

35. The reviewing entity is the Public Sector Commissioner, a special commission, or another appropriately qualified person.
36. A public sector review is defined in clause 253 as:
  - a. a review about any matter or aspect of public administration, or of public sector management, relating to the main purpose of this Act; and
  - b. includes a review about the effectiveness, efficiency, functions or activities of a public sector entity.
37. Under clause 3, the main purpose of the Act will be to provide 'a framework for a fair and integrated public sector that serves the people of Queensland and the State'. Clause 4 sets out that the main purpose is to be achieved by measures including 'taking measures to promote the effectiveness and efficiency of public sector entities' (clause 4(a)(iv)).
38. The following entities are exempt from such a review (clause 254(2)):
  - a. the Crime and Corruption Commission;
  - b. the Office of the Information Commissioner established under the *Right to Information Act 2009*;
  - c. the Queensland Integrity Commissioner under the *Integrity Act 2009*;
  - d. the Office of the Ombudsman established under the *Ombudsman Act 2001*;
  - e. the audit office;
  - f. another entity prescribed by regulation.
39. The Explanatory Note states that the reason for these entities being excluded is that they have been identified as 'certain core integrity bodies.' Other than by reference to *Let the sunshine in*, the final report on culture and accountability in the Queensland public sector by Professor Peter Coaldrake AO (**Coaldrake Report**), no further explanation is provided as to why these particular core integrity bodies have been identified.<sup>21</sup>

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<sup>21</sup> Explanatory Notes, Public Sector Bill 2022 (Qld) 2.

## Classification of the QHRC

40. The Coaldrake Report adopted the classification of integrity agencies based on the work of Professor A J Brown, as cited by David Solomon (then Queensland Integrity Commissioner) in 2013. This classification distinguishes integrity bodies from ‘the many other publicly funded agencies which contain an integrity function’. ‘Core’ integrity institutions are those that are established solely or primarily to carry out integrity functions, whereas ‘distributed’ integrity institutions are ‘embedded in the internal accountability and governance systems of every organisation’.<sup>22</sup> As the Coaldrake Report put it:

It has been said that those core bodies constitute the ‘integrity *branch*’ while the ‘integrity *system*’ comprises the entire collection of bodies which have some integrity function.<sup>23</sup>

41. This 2013 assessment of Queensland’s integrity system pre-dates the passage of the HR Act, under which the QHRC has new functions. The breadth of potential application of the human rights protected in the HR Act should not be underestimated. The HR Act creates obligations on all public sector entities to act and make decisions in a way that is compatible with human rights and give proper consideration to human rights when making decisions. At its core, the HR Act compels Executive government to consider the human rights of all Queenslanders when making decisions.
42. The QHRC performs functions that are a key part of the integrity system as a ‘distributed integrity institution’. The QHRC acknowledges that a relevant consideration may be that, unlike core integrity bodies, it is not presently subject to direct parliamentary scrutiny. As such, there must be a process for independent oversight and accountability as to how the QHRC discharges its functions. As the Coaldrake Report put it:

That a body is ‘independent’ does not mean it can act in an unfettered way. While an independent body must be able to exercise its functions free from external direction, it must remain accountable for the way in which it performs its legislated functions and exercises its powers.<sup>24</sup>

43. Nonetheless, in order to fulfil its statutory functions, and to ensure public confidence in its independence, there are sound reasons why the public sector review function should not apply to the QHRC as set out in the Bill.

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<sup>22</sup> Professor Peter Coaldrake AO, *Let the Sunshine In: Review of Culture and Accountability in the Queensland Public Sector* (Final Report, 28 June 2022) 6, citing David Solomon, ‘The Integrity branch – parliament’s failure or opportunity?’, (2013) *Australasian Parliamentary Review*, which in turn cites a ‘forthcoming chapter’ by Professor A J Brown on the integrity branch in ‘Groves book on Administrative Law’.

<sup>23</sup> Professor Peter Coaldrake AO, *Let the Sunshine In: Review of Culture and Accountability in the Queensland Public Sector* (Final Report, 28 June 2022) 6.

<sup>24</sup> Professor Peter Coaldrake AO, *Let the Sunshine In: Review of Culture and Accountability in the Queensland Public Sector* (Final Report, 28 June 2022) 6.

44. The potential for such powers to be misused and the ‘chilling effect’ of the mere presence of the powers, would seriously undermine the QHRC’s statutory independence from the Executive and as an inherent part of the state’s integrity system. Such a concern is reflected in the review of the *Public Service Act 2008* undertaken by Peter Bridgman in 2019 that identified the QHRC:
- as one of several ‘agencies with accountability obligations and statutory independence from the Executive Government’ for which ‘concurrence’ would be required in order to conduct a review or inquiry,<sup>25</sup>; and
  - included the Commission as part of the ‘integrity network’ with whom the Queensland Governance Council should engage in undertaking the ‘task of building a new integrity model for the next 20 years’<sup>26</sup>. Relevantly, along with the Integrity Commissioner, Crime and Corruption Commission, Information Commissioner and Ombudsman.

## Relevant functions of the QHRC

45. The QHRC’s functions include promoting an understanding and acceptance, and public discussion, of human rights and the Act in Queensland,<sup>27</sup> intervening in proceedings before a court or tribunal in which a question of law arises that relates to the HR Act;<sup>28</sup> reviewing public entities’ policies, programs, procedures, practices and services in relation to their compatibility with human rights;<sup>29</sup> and reporting on actions the QHRC considers a public entity should take to ensure its acts and decisions are compatible with human rights.<sup>30</sup>
46. In carrying out these functions, the QHRC may be required to take actions that are critical of decisions of the government, ministers, and/or public entities, where those decisions (in the QHRC’s view) disproportionately and unreasonably impact on human rights. For instance, the QHRC is currently intervening in several Supreme Court proceedings involving various public entities’ COVID-19 vaccine mandates.
47. The QHRC also handles complaints under the AD Act that may be made against public sector agencies, as well as complaints under the HR Act, which can only be made against public entities.
48. Historically, the QHRC has handled complaints of acute political sensitivity, including some involving ministers, members of parliament, and senior public officials.

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<sup>25</sup> Peter Bridgman, *A Fair and Responsive Public Service for All: Independent Review of Queensland’s State Employment Laws* (Report, May 2019), 56.

<sup>26</sup> Peter Bridgman, *A Fair and Responsive Public Service for All: Independent Review of Queensland’s State Employment Laws* (Report, May 2019), 121.

<sup>27</sup> *Human Rights Act 2019* (Qld) s 61(d).

<sup>28</sup> *Human Rights Act 2019* (Qld) s 51.

<sup>29</sup> *Human Rights Act 2019* (Qld) s 61.

<sup>30</sup> *Human Rights Act 2019* (Qld) s 88(4).

49. The QHRC acknowledges that it may be subject to review powers under the current *Public Service Act 2008* (see sections 37 and 88O), which are similar to those proposed in the Bill.<sup>31</sup> However, it is unclear to what extent the functions of the QHRC, particularly the relevant new functions under the HR Act, were considered in drafting those provisions.
50. The Explanatory Note to the Human Rights Bill 2018 makes parliament's intention clear about how the QHRC's functions are to be fulfilled and that the QHRC has much in common with the other 'core integrity' agencies that are exempt from a public sector review:

In this way the Bill will form part of the suite of other administrative law obligations and oversight mechanisms that aim to hold the government accountable, such as the:

- *Right to Information Act 2009*;
- *Information Privacy Act 2009*;
- *Judicial Review Act 1991*;
- *Ombudsman Act 2001*;
- *Anti-Discrimination Act 1991*; and
- *Crime and Corruption Act 2001*.<sup>32</sup>

51. In support of this position, a review of submissions made by the QHRC to various parliamentary and other inquiries reveals that, in performing its functions impartially and in accordance with the objects of its enabling legislation, the QHRC has, from time to time, been required to take public positions at odds with the prevailing views of both the Executive and the parliament.
52. The QHRC's role is integral to maintaining 'a dialogue' about the limits on human rights that can (or cannot) be 'justified in a free and democratic society'.<sup>33</sup> This role cannot be performed without maintaining the QHRC's independence, which would be clearly compromised by the review powers in the Bill. Structural and functional independence of the QHRC from the Executive is essential in order for the QHRC to hold government to account. The proposed review powers would constitute an intolerable restriction on the QHRC's independence and impede its ability to impartially perform its functions.

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<sup>31</sup> *Public Services Act 2008* (Qld) sch 1 (Public service offices and their heads).

<sup>32</sup> Explanatory Notes, Human Rights Bill 2018 (Qld) 5–6.

<sup>33</sup> *Human Rights Act 2019* (Qld) s 13(1) and the Preamble.

## Potential implications for information disclosure

53. There are also potential inconsistencies between the proposed new powers and the QHRC's obligation in its legislation.
54. Section 220 of the AD Act prohibits the QHRC from disclosing information about a person's affairs. Clause 260 of the Bill gives a person a discretion to disclose a document or information to the reviewing entity, and that would likely constitute an exemption under s220(2)(a) of the AD Act.
55. Under clause 261 of the Bill, the reviewing entity is to prepare a report. Clause 262 provides that 'sensitive information' need not be included in a report, although this is discretionary:
- sensitive information** means information—
- (a) that would be contrary to the public interest to disclose; or
- Examples of when disclosing information may be contrary to the public interest—*
- 1 *The disclosure would have a serious adverse effect on an entity's commercial interests.*
- 2 *The disclosure would reveal trade secrets.*
- 3 *The disclosure would cause damage to relations between the State government and another government.*
- (b) for which, in any judicial proceeding, the State would have a basis for claiming that disclosure should not be permitted.
56. The reviewing entity may include the information in a separate document given to the referring entity. Clause 259 of the Bill also requires that the reviewing entity give the referring entity information that it asks for, and that information is described as 'confidential'.
57. Clause 263 requires 'confidential information' to be removed before any report is tabled or published. The definition of 'confidential information' is confined to personal information (as defined in the *Information Privacy Act 2009*) that is not already publicly available unless further disclosure of the information is prohibited by law.
58. In comparison, section 220 of the Anti-Discrimination Act prohibits the QHRC from disclosing 'information about a person's affairs', which is broader than 'personal information' under the Information Privacy Act. The former can include information about an organisation and the latter is limited to certain information about individuals.
59. In essence, this means the reviewing entity and referring entity can obtain information (including, it appears, material contained in the complaint files of the

QHRC) that the QHRC is prohibited from disclosing, and could then potentially include that material in a public report.

## Proposed amendments

60. To protect the independence of the QHRC and ensure it can continue to carry out its key functions, it should not be subject to the public sector review process set out in the Bill.
61. There may be other agencies not considered core integrity bodies who are in a similar situation.
62. The QHRC appreciates that it must be answerable for the performance of its functions. As already discussed, the QHRC recently completed the *Building Belonging* report, which made recommendations about discrimination law in Queensland. As the QHRC's governance and accountability mechanisms did not fall within the terms of reference of the review, the QHRC did not comment on these mechanisms in the report. However, the QHRC considers it would be appropriate for the AD Act to be amended to provide for direct oversight of the QHRC by a parliamentary committee. Such an amendment would remove the distinction between the QHRC and other core bodies that comprise Queensland's integrity network.
63. Thank you for the opportunity to make a submission in relation to the Bill.