



Victorian Equal Opportunity
& Human Rights Commission

Submission in response to the National Human Rights Action Plan Draft Baseline Study

7 September 2011

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Introduction

The Victorian Equal Opportunity and Human Rights Commission (**the Commission**) welcomes the opportunity to make a submission in response to the Australian Government's National Human Rights Action Plan Draft Baseline Study (**the Baseline Study**).

The Commission is an independent statutory body that has functions under the *Equal Opportunity Act 2010*, the *Racial and Religious Tolerance Act 2001* and the *Charter of Human Rights and Responsibilities Act 2006* (**the Charter**). The Commission's functions include dispute resolution, providing education about human rights and equality of opportunity, undertaking projects and activities aimed at eliminating discrimination and promoting human rights, conducting research, and providing legal and policy advice. In addition, the Commission has a role in reporting to the Victorian Attorney-General on the operation of the Charter and, at the request of public authorities, conducting human rights compliance reviews.

The Commission's response to the Baseline Study

The purpose of the Baseline Study is to examine the state of human rights in Australia. This information will then inform the development of the National Human Rights Action Plan, which will demonstrate Australia's commitment to its international human rights obligations¹ and seek to implement those obligations through an 'action-oriented' national strategy.² The development of the Baseline Study is an important step towards improving the promotion and protection of human rights for all Australians. The Commission commends the Australian Government on taking this first step.

Although not intended to cover every issue, the Baseline Study should present a comprehensive picture of the status of human rights in Australia if it is to provide a meaningful platform for future action and movement towards better realisation of rights. While Australia does 'measure well against many countries' in human rights terms,³ many challenges remain and it is the role of the National Human Rights Action Plan to work to address these challenges and help realise human rights for all people in Australia. The Commission's comments below are designed to help the Australian Government consider some of the areas where the Baseline Study could be improved.

The Commission's submission is set out in the following parts:

- Section 1 provides the Commission's overarching and general comments on the Baseline Study as a whole. It highlights resources that provide a useful starting point and discusses the importance of overarching principles that should guide the development of the Baseline Study and the National Human Rights Action Plan. In particular, it would be useful to recognise the challenges and

¹ Commonwealth Government, Attorney-General's Department, *A New National Human Rights Action Plan for Australia – Background Paper*, 2.

² Office of the High Commissioner for Human Rights, *Handbook on National Human Rights Plans of Action*, UN Doc. HR/P/PT/10, 29 August 2002, parts 3.3 and 3.5. See also Human Rights Law Centre, *Making Rights Real* (February 2011), 3. Available at: <http://www.hrlrc.org.au/content/our-work/law-reform-and-policy-work/domestic-submissions/making-rights-real-submission-on-development-of-national-human-rights-action-plan-17-feb-2011/>

³ Commonwealth Government, Attorney-General's Department, *National Human Rights Action Plan Draft Baseline Study*, 1.

opportunities created by our federal system of government where responsibility for issues is shared between the federal, state and territory governments.

- Section 2 responds to Chapter 1 of the Baseline Study by highlighting issues that should be considered, or that require deeper examination, in the context of any discussion about institutional and legal protections and arrangements that will better promote human rights in Australia.
- Section 3 responds to Chapter 2 of the Baseline Study. This section provides some overarching comments regarding the human rights concerns of the general community, as well as identifying additional concerns that should be considered within the Chapter.
- Section 4 responds to Chapter 3 of the Baseline Study. This section includes some general comments about the approach of this Chapter and the intersectional and interrelatedness of human rights issues. It also identifies additional specific groups that have not been included and points to further references, data and initiatives that could be considered as part of this Chapter.
- In Section 5, the Commission draws attention to the key issues that should be highlighted and explored in the Baseline Study, and the specific measures and actions that should be addressed in the National Human Rights Action Plan to ensure enhanced protection of human rights in the future.

The Commission acknowledges the complexity of preparing the Baseline Study. However, the importance of this task cannot be underestimated. A comprehensive Baseline Study will provide the Australian Government with an opportunity to develop a robust and realistic National Human Rights Action Plan, which aims to achieve the realisation of human rights for all Australians.

General Comments

To ensure that Australian society progresses ‘into the future as a fair, successful and proudly diverse community’ we must commit to and invest in human rights.⁴ The development of the Baseline Study and the correlating National Human Rights Action Plan will firmly establish this commitment and provides an opportunity to acknowledge and address the full extent of human rights issues in Australia.

A good starting point for identifying the critical human rights issues affecting Australians, and ways that these issues can be adequately addressed, are the reports of various United Nations treaty bodies including through the Universal Periodic Review (UPR) process.⁵ While the Baseline Study is informed by Australia’s

⁴ Victorian Equal Opportunity and Human Rights Commission’s submission in response to the 2009 National Human Rights Consultation, 6. Available at: http://www.humanrightscommission.vic.gov.au/index.php?option=com_k2&view=itemlist&layout=category&task=category&id=33&Itemid=496

⁵ See: Human Rights Council, *Report of the Working Group on the Universal Periodic Review – Australia* (24 March 2011), A/HRC/17/10. Available at: <http://www.ohchr.org/EN/HRBodies/UPR/PAGES/AUSession10.aspx>; Human Rights Committee, *Consideration of Reports Submitted by States Parties under Article 40 of the Covenant, Concluding Observations of the Human Rights Committee, Australia*, 95th session, 7 May 2009, CCPR/C/AUS/CO/5; *Consideration of Reports Submitted by States Parties under Articles 16 and 17 of the Covenant, Concluding Observations of the Committee on Economic, Social and Cultural Rights, Australia*, 42nd session, 22 May 2009, E/C.12/AUS/CO/4; *Consideration of Reports Submitted by States Parties under Article 9 of the Convention, Concluding Observations of the Committee on the Elimination of Racial Discrimination, Australia*,

UPR there are issues that could be more fully addressed. For example, the Baseline Study should recognise the need for a formal reconciliation process with Indigenous Australians. Reference to the UPR recommendations would provide a useful tool against which to monitor human rights issues and measure progress.

It would also be helpful to identify the overarching principles that are guiding the development of the Baseline Study and the National Human Rights Action Plan. This would establish a general framework for the development of the Baseline Study, National Human Rights Action Plan and other government initiatives. Such a framework should include principles of prevention, shared responsibility, participation and accountability.⁶ The adoption of these principles would contribute to a more consistent, human rights enabling approach across government. An example of this is found in the active participation of people in the development of the National Disability Strategy which has resulted in a comprehensive policy package that has prospects for real success.

The Baseline Study would also be improved if it were to address:

- the need for intra-government arrangements to ensure progress is made. While the National Human Rights Action Plan is being driven by the Attorney-General's Department, many of the resourcing and policy decisions will lie elsewhere in government, and
- the realities of our federal system of government. For example, while the Australian Government may set the broad agenda and policy, the states and territories are responsible for service delivery in many important areas. The Baseline Study should address the cooperative arrangements that will be needed to ensure appropriate actioning and accountability across governments.

Chapter One: Protection and promotion of human rights in Australia

While it is encouraged by the Australian Government's commitment to better engagement with the United Nations processes and procedures, the Commission would like to see a commitment in the National Human Rights Action Plan to enhancing human rights protections at a domestic level: within our legal, political, social and economic structures. It would be useful if this Chapter dealt with in more detail the institutions and frameworks that currently promote and protect human rights within Australia, including consideration of the gaps and limitations of those structures and the adequacy of existing human rights protections.

This Chapter should address:

⁷⁷th session, 27 August 2010, CERD/C/AUS/CO/15-17; *Concluding Observations of the Committee on the Elimination of Discrimination Against Women, Australia*, 46th session, 30 July 2010, CEDAW/C/AUS/CO/7.

⁶ The principle of participation seeks to involve people in decision-making processes that affect them. The principle of prevention focuses on early intervention and addressing the root causes of social ills, rather than only addressing symptoms. The principle of shared responsibility recognises the role and responsibility played by all people in the community and across government in achieving better outcomes. The principle of accountability is central to our democracy, and requires the establishment of mechanisms to monitor the decisions and actions of government and government officials.

- The findings of the National Human Rights Consultation Committee in its *National Human Rights Consultation Report* (2009), in particular its key recommendation; that Australia enact a federal Human Rights Act.⁷
- The need for improvements to federal anti-discrimination laws as part of the current work towards a consolidated Federal Equality Act. A number of reports have indicated that current federal anti-discrimination laws could be improved to help Australia meet its obligations under international human rights law.⁸ This should involve a commitment to extend protection to discrimination on the basis of sexual orientation, gender identity and homelessness, and the inclusion of a positive duty to prevent discrimination.
- The links between poverty and inequality, and research that highlights the negative effects of inequality in communities and the positive social benefits (i.e. improved health, well-being and increased workforce participation) that result from the active realisation of the right to equality and non-discrimination.⁹
- The need for a strategy to improve consultation and engagement with Indigenous Australians at the law and policy development phase, particularly regarding laws and policies that directly affect them.¹⁰
- Strategies for measuring and monitoring human rights implementation and outcomes across government over time, including mechanisms to identify gaps in data collection and steps to address those gaps.
- The importance of human rights education, a commitment to its inclusion on the national curriculum, and the need for the Australian Government to work with the States and Territories in the implementation of human rights education in schools.
- The need for an independent mechanism to review and monitor the implementation of the United Nations treaty body recommendations. While government is responsible for ensuring the realisation and enjoyment of human rights by all Australians, it is important that there is an independent system in place to monitor the Government's progress against its obligations under international human rights law.
- The role and functions of the Australian Human Rights Commission (AHRC) require further discussion. In particular, its current human rights mandate, its power to make recommendations and determinations, its review and oversight functions, and its educative role are all relevant and should be examined further in this section.

⁷ *Recommendations - Report of the National Human Rights Consultation* (2009). Available at: http://www.humanrightsconsultation.gov.au/www/nhrcc/nhrcc.nsf/Page/Report_NationalHumanRightsConsultationReportDownloads.

⁸ Human Rights Committee, *Consideration of Reports Submitted by States Parties under Article 40 of the Covenant, Concluding Observations of the Human Rights Committee, Australia*, 95th Session, 7 May 2009, CCPR/C/AUS/CO/5 [12].

⁹ VEOHRC, *Occasional Paper: Economics of Equality*, June 2010, p 5. See also J. Stiglitz, A. Sen and JP Fitoussi, *Report by the Commission on the Measurement of Economic Performance and Social Progress* (2009).

¹⁰ Such a strategy has been recommended through the UPR process. Human Rights Council, *Report of the Working Group on the Universal Periodic Review – Australia* (24 March 2011), A/HRC/17/10. Available at: <http://www.ohchr.org/EN/HRBodies/UPR/PAGES/AUSession10.aspx>;

- Budget, resources and institutional arrangements that will need to be put in place to ensure coordination and accountability during the implementation of the National Human Rights Action Plan.
- The importance of broad engagement with civil society, particularly with consumers / people directly affected by proposed laws and policies (e.g. Indigenous Australians, people with a disability, people experiencing homelessness, young people, older people, and Gay, Lesbian, Bi-sexual, Transgender and Intersex, etc).

Chapter Two: Human rights concerns of the general community

Additional concerns

This Chapter discusses four key human rights concerns that affect the general community. These four concerns were recognised during the National Human Rights Consultation process.¹¹ However, many other important human rights concerns were identified during that process and have not been included here. While we appreciate the need for the Baseline Study to be manageable, and it may not therefore touch on every human rights issue in Australia, there are some important matters that have been recognised by the community in recent consultation processes that warrant consideration in the Baseline Study.

The findings of the National Human Rights Consultation demonstrate that the general community considers that both civil and political rights, and economic, social and cultural rights should be better protected and promoted in Australia.¹² Independent research commissioned by the National Human Rights Consultation Committee found that 'economic, social and cultural rights are at the top of the list of rights that are considered most important to the Australian community.'¹³ This is consistent with other reports and findings, including our work in the Victorian community.¹⁴ The Commission would therefore see value in addressing economic, social and cultural rights as part of this process. In particular, the right to health, the right to education, the right to adequate housing, and the right to social security. This comprehensive approach to rights identification is consistent with the well-established principle in international human rights law that human rights are universal, interrelated and interdependent, and would reflect Australia's international obligations.¹⁵

Another way of approaching this issue would be to consider community concerns within a discussion about specific human rights. Using this model, human rights are

¹¹ Above n 3, 9.

¹² *Summary - Report of the National Human Rights Consultation* (2009), XV. Available at: http://www.humanrightsconsultation.gov.au/www/nhrcc/nhrcc.nsf/Page/Report_NationalHumanRightsConsultationReportDownloads.

¹³ Ibid.

¹⁴ VEOHRC, *Putting Principle into Practice*, Submission to the Scrutiny of Acts and Regulations Committee (SARC) on the four-year review of the *Charter of Human Rights and Responsibilities Act 2006* (July 2011). Available at: http://www.humanrightscommission.vic.gov.au/index.php?option=com_k2&view=itemlist&layout=generic&tag=Charter&task=tag&Itemid=794

¹⁵ The Vienna Declaration and Programme of Action, as adopted by the World Conference on Human Rights on 25 June 1993, [A/CONF.157/23]. See also Maastricht Guidelines on Violations of Economic, Social and Cultural Rights, Maastricht, January 22-26, 1997.

considered as a starting point, using the lens of the community's experiences to determine progress. The 2010 New Zealand Baseline Study provides a good example of where general community concerns have been considered within discussions about specific human rights.¹⁶ Phrasing the discussion in human rights terms, rather than based on discrete community issues, also promotes and enhances understanding of human rights within government and the community.

Additional data or research findings

The Baseline Study could benefit from further consideration of consumer-based research and qualitative evidence. For example, the following resources capture relevant consumer-based research and qualitative evidence, including, among others, the voices of Indigenous Australians, young people, and people experiencing homelessness:

- South East Health, *Homelessness Health Consumer Consultation*, November 2002. Available at: http://www.sesiahs.health.nsw.gov.au/Publications/Homelessness_Health/consumerCons.pdf
- Australian Youth Affairs Coalition, 'Where are you going with that?': *Maximising Young People's Impact On Organisational & Public Policy* (2010).
- PILCH Homeless Persons' Legal Clinic, *Promoting and Protecting the Human Rights of People Experiencing Homelessness in Australia*, 2009. Available at: <http://www.pilch.org.au/homelessnesshumanrights/>
- Our Consumer Place: A Resource Centre for Mental Health Consumers. Go to: <http://www.ourconsumerplace.com.au/clearinghouse>
- Report of the Board of Inquiry into the Protection of Aboriginal Children from Sexual Abuse, *Ampe Akelyernemane Meke Mekarle 'Little Children are Sacred'* (2007). Available at: http://www.inquirysaac.nt.gov.au/pdf/bipacsa_final_report.pdf

In addition, the following resources may assist with this section:

- New Zealand Human Rights Commission, *Human Rights in New Zealand 2010 – Nga Tika Tangata O Aotearoa 2010* (The equivalent New Zealand Baseline Study). Available at: <http://www.hrc.co.nz/human-rights-environment/human-rights-in-new-zealand-2010/>
- Richard Wilkinson and Kate Pickett, *The Spirit Level: More Equal Societies Almost Always Do Better* (2009), Allen Lane, UK.
- Mark Peel, *The Lowest Rung: Voices of Australian Poverty* (2003), Cambridge University Press.

¹⁶ New Zealand Human Rights Commission, *Human Rights in New Zealand 2010 – Nga Tika Tangata O Aotearoa 2010* (The equivalent New Zealand Baseline Study). Available at: <http://www.hrc.co.nz/human-rights-environment/human-rights-in-new-zealand-2010/>

Existing government initiatives that could be included

Equality and non-discrimination are vital to the realisation of human rights. The federal anti-racism strategy is being developed and would be useful to address as part of the Baseline Study. It will be important that strategies such as this are adequately resourced and reviewed to ensure they reach their potential and deliver meaningful results.

Chapter Three: The human rights experience of specific groups in Australia

As the National Human Rights Consultation Committee found, human rights are relevant to all Australians and improved protection of human rights is a matter of national significance.¹⁷ The focus on the particular needs of groups in the community in this Chapter could be balanced by a rights-based, rather than issues-based, approach to Chapter Two.

Additional groups

In addition to the groups addressed in the draft Baseline Study, consideration should be given to the particular needs of:

- People from regional, rural and remote communities;
- People experiencing poverty and exclusion; and
- Culturally and linguistically diverse (CALD) communities.

The Baseline Study could be improved through recognition that asylum seekers and migrants can experience some very different human rights issues.

It would also be useful to recognise in the Baseline Study the intersectionality of human rights issues between groups and across rights. Individuals often experience multiple and interrelated human rights issues that are specific to their circumstances. For example, people experiencing homelessness are not only denied their right to a home, this often affects their ability to realise other rights. People experiencing street homelessness may also experience denial of their civil and political rights that arise if they have contact with the justice system for offences relating to public space.

Additional data or research findings

The following resources may be useful in this context:

- Rural and Regional Committee, *Inquiry into the Extent and Nature of Disadvantage and Inequity in Rural and Regional Victoria* (October 2010). Available at: <http://www.parliament.vic.gov.au/rrc/inquiries/article/897>
- OECD, 'Country Note: Australia', *Growing Unequal? Income Distribution and Poverty in the OCED Countries* (2008). Available at: <http://www.oecd.org/dataoecd/44/47/41525263.pdf>

¹⁷ Above n 12, XIII.

- Victorian Equal Opportunity and Human Rights Commission, *Economics of Equality: An investigation into the economic benefits of equality and a framework for linking the work of the Commission with its impact on the wellbeing of Victorians* (June 2010). Available at: http://www.humanrightscommission.vic.gov.au/index.php?option=com_k2&view=item&id=570:economics-of-equality&Itemid=690
- Equality and Human Rights Commission (UK), *Equality Measurement Framework*. Available at: <http://www.equalityhumanrights.com/key-projects/equality-measurement-framework/>
- Australian Human Rights Commission, *Social Justice Report 2008*. Available at: http://www.hreoc.gov.au/social_justice/sj_report/sjreport08/index.html
- Australian Human Rights Commission, *Social Justice Report 2009*. Available at: http://www.hreoc.gov.au/social_justice/sj_report/sjreport09/index.html
- Australian Human Rights Commission, *Social Justice Report 2010*. Available at: http://www.hreoc.gov.au/social_justice/sj_report/sjreport10/index.html
- *Royal Commission into Aboriginal Deaths in Custody Final Report* (1991). Available at: <http://www.austlii.edu.au/au/other/IndigLRes/rciadic/>
- Australian Human Rights Commission, *A Last Resort? National Inquiry into Children in Immigration Detention* (2004). Available at: http://www.hreoc.gov.au/human_rights/children_detention/index.html
- Australian Human Rights Commission, *2008 Immigration Detention Report – Summary of Observations following visits to Australian immigration detention facilities* (2008). Available at: http://www.hreoc.gov.au/human_rights/immigration/idc2008.html
- Australian Human Rights Commission, *Immigration detention and offshore processing on Christmas Island* (2009). Available at: http://www.humanrights.gov.au/human_rights/immigration/idc2009_xmas_island.html
- Australian Human Rights Commission, *Isma: Listen, National Consultations on Eliminating Prejudice against Arab and Muslim Australians* (2004).
- Australian Human Rights Commission, *In our own words: African Australians: A review of human rights and social inclusion issues* (2010).
- Amrita Dasvarma and Evelyn Loh, *Intersectional Discrimination* (13 March 2002). Available at: http://www.hreoc.gov.au/racial_discrimination/conferences/beyond_tolerance/speeches/dasvarma.html

Additional human rights issues that affect specific groups

The Baseline Study would also be improved through consideration of the strengths and limitations of current population based initiatives and whether they could be strengthened. The UPR recommendations will help the Government identify the relevant issues.

For example, the section on Indigenous Australians should address the need for a reconciliation plan, reparations for the Stolen Generation, prevention of deaths in custody, and improvement of land rights and cultural heritage laws. It should also recognise the limitations with the current operation of the Northern Territory Emergency Response - for example, how the Government will address concerns that income quarantining will in practice continue to have a disproportionate and discriminatory effect on Indigenous Australians regardless of its application to all Australians.

The section on refugees and asylum seekers should consider in more detail: mandatory immigration detention, offshore processing, stateless persons and their treatment under the law, and children in detention.

It would be useful for the Baseline Study to address how current population based strategies (such as the National Disability Strategy, the Closing the Gap initiative and other policies)¹⁸ and a National Human Rights Action Plan will be integrated. This should also help in an analysis of any gaps in current strategies and resources.

Issues that a National Human Rights Action Plan could address

In summary, and based on its above comments and suggestions, the Commission recommends that the Baseline Study explore the following issues in more detail:

- That the Baseline Study incorporate an examination of government strategic initiatives that are working well,¹⁹ and those that are not working well. This discussion should highlight the gaps in current initiatives and the challenges moving forward.
- That the Baseline Study commit to key principles (i.e. prevention, participation, shared responsibility across government and accountability) and discuss mechanisms to implement and monitor the operation of those principles within government.
- That the Baseline Study comprehensively consider the recommendations and concluding observations of various United Nations treaty bodies including through the UPR process.
- That the Baseline Study consider the importance of ongoing monitoring and evaluation of human rights in Australia, with a view to developing human rights indicators.
- That the Baseline Study discuss a mechanism that addresses the constitutional realities of our federal system. The Baseline Study should address the cooperative arrangements that will be needed to ensure appropriate actioning and accountability across governments.

¹⁸ For example, the National Plan to reduce Violence Against Women, the National Disability Strategy, Closing the Gap strategy, the COAG framework etc.

¹⁹ See also: Council of Australian Governments, Protecting Children is Everyone's Responsibility: National Framework for Protecting Australia's Children 2009– 2020 (2009).

- That the Baseline Study prioritise government investment in funding and support for the National Human Rights Action Plan, so as to avoid the risk of the plan failing to achieve results.

Based on its above comments and suggestions, the Commission recommends that the following specific measures and actions be adopted in the National Human Rights Action Plan to improve human rights outcomes:

- In order to enhance the scrutiny and implementation of human rights, an independent body should review and oversee Australia's implementation of the United Nations treaty body concluding observations and UPR recommendations. The Commission recommends that the AHRC fulfil this role.
- The AHRC mandate should also be extended to cover economic, social and cultural rights and its functions should be enhanced so that its determinations and recommendations are enforceable.
- Development of a consolidated Federal Equality Act, which complies with Australia's international human rights obligations. This should involve a commitment to extend protection against discrimination on the basis of sexual orientation, gender identity and homelessness, and the inclusion of a positive duty to prevent discrimination.
- Legislative protections require further strengthening and the development of a Federal Human Rights Act should remain a goal.
- Development of a strategy to improve consultation and engagement with Indigenous Australians at the law and policy development phase, particularly regarding laws and policies that directly affect them.
- A framework for ongoing monitoring and evaluation of human rights outcomes across the Australian Government should be developed.
- The Australian Government should undertake an analysis of the strengths and weaknesses in its current population based strategies and initiatives, so that these may be aligned with the National Human Rights Action Plan.
- Recognition is given to poverty as a human rights issue and that this is used to inform law and policy development.
- To ensure accountability and transparency in resourcing the National Human Rights Action Plan, annual federal budget statements should include a separate statement by the Treasurer on how that Budget meets Australia's treaty obligations (for example, funding of the National Plan to reduce Violence Against Women is consistent with Australia's obligations under the *Convention on the Elimination of all forms of Discrimination Against Women*).²⁰

²⁰ For example, under the previous government in Victoria all state budgets included a specific statement of budget commitments to reduce disadvantage. This "A Fairer Victoria" statement provides a good example of self-monitoring by government.

- Establish an ongoing commitment to human rights education, its inclusion on the national curriculum, and articulate how the Australian Government will work with the States and Territories in the implementation of human rights education in schools.
- An ongoing issue that arises throughout the Baseline Study is the matter of inter-government coordination. A strategy needs to be agreed upon between the federal, state and territory governments, which sets out how they will work together to achieve positive human rights outcomes under the National Human Rights Action Plan.
- The National Human Rights Action Plan should include institutional arrangements to ensure federal, state and territory accountability for human rights outcomes.

Conclusion

The Commission commends the Australian Government on its commitment to improving human rights in Australia through the development of the Baseline Study and National Human Rights Action Plan. It is important that this process produce real and measurable outcomes: the Baseline Study and National Human Rights Action Plan should be aiming to achieve better human rights protections for all Australians. To do this, these initiatives need to focus on strengthening the normative human rights framework in Australia, with practical initiatives and ongoing monitoring and evaluation to ensure success.

The Commission thanks the Attorney-General's Department for the opportunity to provide comments on the Baseline Study and is happy to provide further comments and information if required. The Commission would also welcome opportunity to be actively involved in development of the National Human Rights Action Plan.

Contact

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