Commercial–in–confidence

Response to Discussion Paper

Consolidation of Commonwealth Anti-Discrimination Laws

Submission by Freehills

1 February 2012

Freehills

1 Introduction

This submission has been prepared by Freehills in response to the discussion paper released by the Hon. Robert McClelland MP, then Attorney-General, and Senator the Hon. Penny Wong, Minister for Finance and Deregulation on 22 September 2011, entitled 'Consolidation of Commonwealth Anti-Discrimination Laws Discussion Paper' (**Discussion Paper**).

Freehills is an Australian commercial law firm. We regularly provide legal advice on the engagement of volunteers and ongoing obligations owed to volunteers. The majority of the clients to whom we provide this advice operate in the not-for-profit sector. Each year, Freehills assists more than 450 not-for-profit clients, including some of Australia's largest charitable organisations, on approximately 800 different matters.

This submission focuses upon the application of the federal anti-discrimination laws (**Laws**) to volunteers and not-for-profit organisations. Accordingly, our submission only addresses the questions specifically relevant to these matters.

We welcome the proposal to develop a consolidation bill. It is essential, however, to provide clarification regarding the operation of the legislation for not-for-profit organisations. To minimise the impact on not-for-profits, it is critical to ensure that their obligations are made clear and easy to understand without placing further regulatory burdens upon the sector.

Where it is intended to expand the Laws, either because they were previously unclear or did not apply to certain situations, further consultation with the sector as to appropriate levels of application is vital.

2 Special Measures

Question 3: Should the consolidation bill include a single special measures provision covering all protected attributes? If so, what should be taken into account in defining that provision?

'A means by which the injustice or unreasonableness of formal equality can be diminished or avoided is the taking of special measures. A special measure is, ex hypothesi, discriminatory in character; it denies formal equality before the law in order to achieve effective and genuine equality.' [1]

[1] *Gerhardy v Brown* (1985) 159 CLR 70, Brennan J at 130.

Special measures provisions have played an important role across Federal, State and Territory anti-discrimination laws. We support the ongoing emphasis on special measures to enable organisations to help achieve substantive equality for disadvantaged groups in Australian society.

At present, however, it is time consuming and often onerous for organisations, particularly not-for-profits with limited resources, to conclude with confidence as to whether an activity constitutes a *'special measure'*. The uncertainty of whether an activity constitutes a special measure makes it necessary to seek legal advice and/or apply for temporary exemptions.

Therefore, we support the inclusion of a single special measures provision in the consolidation bill which covers all protected attributes.

A single provision provides a number of benefits. Firstly, it will provide consistency in regards to what the Federal protections of certain attributes are. Secondly, it will allow for greater certainty as to what constitutes a *'special measure'*. Finally, inclusion of a single provision will also enable a body of case law to develop that will provide further guidance.

However, consideration needs to be given to how such a provision will be drafted, taking into account differing *'special measures'* provisions across each of the existing Laws.

The section needs to be sufficiently broad to cover all areas where special measures can be implemented. For example, we have assisted a client that wished to advertise for, and employ, women only. The rationale for engaging women only was to provide a service to indigenous women (i.e. the act of employing women only was not itself a *'special measure'* as it was not designed to assist women to gain employment in that area).

To this end, the consideration of State provisions may help inform discussions. A possible approach is to adopt the positive wording of the *Equal Opportunity Act 2010* (Vic):

'A person may take a special measure for the purpose of promoting or realising substantive equality for members of a group with a particular attribute.' [2]

Additionally, a clearly defined special measures provision may help to reduce the number of organisations unnecessarily seeking temporary exemptions (we address the question of temporary exemptions further in this paper).[3]

However, including a single special measures provision will not remove all uncertainty regarding its operation. Case law may provide guidance, but this will take time to develop.

---

[2] Section 12(1).

[3] For example, see the following notices of the Australian Human Rights Commission refusing to grant a temporary exemption in circumstances where temporary exemptions have not been considered necessary as the conduct in question does not constitute unlawful discrimination: Deli Women & Children's Centre (22 September 2009) and Griffith City Council trading as Griffith Regional Aquatic Leisure Centre (20 June 2008) both seeking temporary exemptions pursuant to section 44(1) of the *Sex Discrimination Act 1984* (Cth) and MOSEDG Inc. trading as Youth Connect seeking a temporary exemption pursuant to section 44(1) of the *Age Discrimination Act 2004* (Cth) (10 August 2007).

We support the inclusion in the consolidation bill of examples of conduct which constitute special measures. These examples can be taken from case law principles developed from the existing Laws. This approach has been adopted by the *Equal Opportunity Act 2010* (Vic) and the *Discrimination Act 1991* (ACT) as well as the *Age Discrimination Act 2004* (Cth) (**ADA**).[4] Such a step may assist to provide some initial guidance to organisations.

A further consideration is whether the consolidation bill should codify requirements for establishing what constitutes a special measure. For example, the *Equal Opportunity Act 2010* (Vic) details the tests to be applied to determine whether the relevant conduct is a special measure.[5] These tests arise from case law and can be used to inform how the provisions should be read and applied. Such provisions may provide guidance in determining whether the proposed conduct may be a special measure. Alternatively, such an approach could be considered too prescriptive. Further consideration and consultation regarding the benefits and drawbacks of such an approach may be necessary.

Additionally, the introduction of a process allowing the Australian Human Rights Commission (**Commission**) to certify a measure as a 'special measure' may be helpful. For example, a certification process under the *Anti-Discrimination Act 1977 Act* (NSW) enables the Minister to certify a program or activity as a 'special needs' activity if its purpose is the promotion of access to facilities, services or opportunities for members of a group affected by an area of discrimination under the *Anti-Discrimination Act 1977 Act* (NSW).[6]

While the way in which Commonwealth certification would operate in practice requires detailed consideration,[7] such a process would be a valuable way to provide certainty to organisations about the operation of the Laws.

We recommend that the Commission be empowered to:

- 'certify' that a particular measure will be a 'special measure'; and
- issue guidance notes as to what will constitute special measures (see our comments at 5).

Not-for-profit organisations regularly seek to implement measures to promote substantive equality. Clarifying the operation of the 'special measures' provision in the manner described above will assist not-for-profits to avoid the necessity of (a) seeking costly legal

[4] See the examples to section 12(1) of the *Equal Opportunity Act 2010* (Vic), section 27(1) of the *Discrimination Act 1991* (ACT) and the example to section 33(c) of the ADA.

[5] At sections 12(1), (3)-(4).

[6] Section 126A(2).

[7] For example, whether certification only operates for a specified period of time and whether a review mechanism would be available if certification was unsuccessful.

advice and (b) applying for temporary exemptions in order to clarify whether something is a special measure.

3 Protected areas of public life

3.1 Articulation of areas of public life

Question 12: What is the most appropriate way to articulate the areas of public life to which anti-discrimination law applies?

Currently, there are different approaches to the articulation of areas of 'public life' under the Laws. As the Discussion Paper outlines, the most common approach is to make discrimination unlawful in specific activities (such as hiring and firing in employment) and in specific areas of public life (such as work, education and provisions of goods and services). This approach is adopted by the ADA, the Sex *Discrimination Act 1984* (Cth) (**SDA**) and the *Disability Discrimination Act 1992* (Cth) (**DDA**).[8]

In contrast, however, section 9 of the *Racial Discrimination Act 1975* (Cth) (**RDA**) provides that it is unlawful to do a discriminatory act which interferes with the enjoyment of *'any human right or fundamental freedom in the political, economic, social, cultural or any other field of public life'*. While the RDA also contains specific provisions prohibiting discrimination in various areas of life, it makes it clear that these provisions do not limit the generality of section 9.[9] As the Discussion Paper notes, the RDA's approach can result in a great deal of uncertainty about what activities are covered.

Since the enactment of the first federal anti-discrimination law, the RDA, Australia has had 37 years of experience in the development of the Laws. The articulation of 'areas of public life' in 2012 should take into account Parliament's drafting, and the Courts' interpretations, of 'public life' in more recent times.

The *Anti-Discrimination Act 1998* (Tas) (**Tasmanian Act**) provides for a prohibition of discrimination in *any activity* as long as it is 'in connection with' specific areas of public life. The Tasmanian Act provides an exhaustive list of areas to which the section applies (such as work, education, training and goods and services).[10]

[8] ADA, sections 18-25 in relation to work and sections 26-32 in relation other areas (including education, access to premises, goods services and facilities and accommodation); SDA, sections 14-20 in relation to work and sections 21-27 in relation other areas (including education, goods services and facilities, accommodation and clubs); DDA, sections 15-21 in relation to work and sections 22-29 and 30 in relation to other areas (including education, access to premises, goods services and facilities and accommodation).

[9] See section 9(4).

[10] See section 22(1)(a)-(g).

In our view, a similar approach to that of the Tasmanian Act should be adopted. Maintaining that discrimination is unlawful in specific areas of 'public life' removes unnecessary complexity and reduces uncertainty as to *what* is covered. This makes it simpler for organisations (particularly those with limited resources) to understand, and comply with, their obligations.

In addition, if the intention is to cover volunteers under the consolidation bill, it is essential that such an intention be made explicit. The broader approach, as envisaged by the RDA, means that volunteers would be covered by implication. While we address the proposed extension of protections to volunteers below, clearly stating that the legislation does or does not cover volunteers would provide greater certainty to volunteers and organisations. If coverage of volunteers is proposed, we recommend that consultation with the not-for-profit sector occur.

3.2 Protection of voluntary workers from discrimination

Question 13: How should the consolidation bill protect voluntary workers from discrimination and harassment?

'*Concern has been raised that the protection of volunteer workers would place an unreasonable burden on organisations with a significant voluntary workforce*.' [11]

Currently, volunteers are not protected from discrimination and harassment under the ADA, DDA or SDA. It is likely, however, that volunteers may be able to bring claims under the RDA. Additionally, four States and Territories already provide this protection, while the *Equal Opportunity Act 2010* (Vic) protects volunteers from sexual harassment (but not discrimination).[12]

Statistics indicate that over 4.6 million Australians volunteered with not-for-profit organisations in 2006-07. The wage equivalent value of this effort is $14.6 billion.[13]

As the Discussion Paper acknowledges, 84% of voluntary work in Australia occurs in the not-for-profit sector.[14] This sector is broad and diverse, with around 600,000 organisations, the majority of which are small unincorporated associations.[15] Many of these organisations operate only in particular States or Territories on limited resources to provide much-needed support and services to Australians across the country.

---

[11] Discussion Paper, page 28.

[12] *Anti-Discrimination Act 1991* (Qld), Schedule – Dictionary (definition of 'work'); *Equal Opportunity Act 1984* (SA), section 5(1) (definitions of 'employee', 'employer' and 'employment); Tasmanian Act, section 3 (definition of 'employment); *Discrimination Act 1991* (ACT), Dictionary (definition of 'employment'); *Equal Opportunity Act 2010* (Vic), section 4(1) (definitions of 'employee', 'employer' and 'employment').

[13] Productivity Commission, Contribution of the Not-For-Profit Sector Research Report (January 2010), page XXVI.

[14] Page 28.

[15] Productivity Commission, Contribution of the Not-For-Profit Sector Research Report (January 2010), page XXIII.

The Productivity Commission has also reported that industry specific and generic legislation is imposing disproportionate costs on not-for-profits. The compliance costs associated with volunteers are becoming especially burdensome.[16]

Any extension of coverage to volunteers will significantly and disproportionately impact not-for-profit organisations. It will affect organisations in States and Territories which do not already have similar protections under applicable legislation. Additionally, it will impact upon organisations in States and Territories with existing legislation, as the Laws and the State/Territory laws are likely to be couched in different terms.

In our view, the additional burden likely to be placed on not-for-profits outweighs the benefits of providing legal redress to volunteers. Due to the nature of volunteering, however, there are significant incentives for organisations to provide a positive volunteering environment. This is particularly important for organisations with limited resources who rely on volunteers, such as those established for charitable or community purposes.

In our experience, not-for-profit organisations are eager to ensure that they operate within principles of best practice. Further, it is in their interests to be an attractive and viable option to people offering to volunteer their time. In our experience, this includes providing information about general guidelines, practices (such as workplace health and safety) and values of the organisation. Such practices are sufficient without a need to impose the added burden of regulatory obligations on not-for profits.

Whilst any decision to extend protection from discrimination and sexual harassment to voluntary workers is a matter of policy, whatever position is ultimately adopted should be made explicit in the consolidation bill. However, if changes are proposed, consultation with the not-for-profit sector is vital to ensure that such changes are not too onerous on not-for-profit organisations.

One option could be to include definitions of employment and/or employee in the consolidation bill that expressly state that this *'does not include unpaid workers and volunteers'*. This approach, adopted by the *Equal Opportunity Act 2010* (Vic),[17] would ensure that there is no room for uncertainty or extension of coverage by implication.

Another option, if coverage is to be extended, could be to provide volunteers with protection from sexual harassment only. This is akin to the approach adopted by the *Equal Opportunity Act 2010* (Vic). The extent of sexual harassment in Australia is significant, with one in five (20%) people aged 18-64 reporting that they have

[16] Productivity Commission, Contribution of the Not-For-Profit Sector Research Report (January 2010), pages XXXII and 257.

[17] Section 4(1) - definitions of 'employee', 'employer' and 'employment'.

experienced sexual harassment at some time in their life.[18] Limiting coverage to sexual harassment could also help minimise the burdens on not-for-profit organisations to comply with the Laws.

In any event, should protection be extended to volunteers, consultation (such as roundtables)[19] with the not-for-profit sector will be critical.

In order to avoid confusion, it will be essential that the consolidation bill is clear on its application to volunteers. Not-for-profit organisations who use volunteers simply do not have the resources to obtain legal advice on the subtleties of the Laws.

Further, consideration should be given to minimising the compliance burden for not-for-profit organisations. As a start, the commencement of the provisions should be delayed to give not-for-profit organisations time to prepare for the new Laws.

Whilst extension of the protections may, potentially, encourage some volunteers to participate, this must be weighed against the impact on not-for-profit organisations, particularly smaller ones.

One way of reducing compliance burdens for not-for-profit organisations could be the development of a 'tiered' compliance approach. Such a 'tiered' approach could be connected to the organisation's turnover, volunteers database numbers or number of employees. Within the not-for-profit sector, larger organisations (i.e. those with a large number of employees, significant resources and an established volunteer scheme) may be better placed to manage additional compliance with obligations than smaller organisations with a very limited number of volunteers.

The parameters and operation of a tiered approach requires closer examination and consultation with the not-for-profit sector. However, by way of example, a code similar to the *Small Business Fair Dismissal Code* under the *Fair Work Act 2009* (Cth) could be implemented. The *Small Business Fair Dismissal Code* provides that employees in 'small businesses' (defined as less than 15 employees) cannot make a claim for unfair dismissal in the first 12 months following their engagement.

A code under the consolidation bill could establish, for example, that volunteers cannot bring a claim of discrimination or harassment unless they have volunteered with the organisation for a specific period of time (e.g. a 'long term volunteer'). Additionally (or in the alternative), a code under the consolidation bill could provide that volunteers cannot make claims against organisations with fewer than 15 employees.

---

[18] *Sexual harassment: Serious business Results of the 2008 Sexual Harassment National Telephone Survey*, Australian Human Rights Commission, October 2008, page 16.

[19] Akin to the roundtable conducted with volunteering organisations and the Workplace Relations Minister in Melbourne on 20 January 2012 regarding national workplace health and safety laws.

In addition, if coverage is extended to volunteers, we recommend that appropriate resources are made available regarding the operation of the provisions. This will be particularly important for organisations in States and Territories where they have not previously had to comply with such obligations. We provide some suggestions below at 5.

3.3 Clubs and member-based associations

Question 15: ***What is the best approach to coverage of clubs and member-based associations?***

Currently, provisions dealing with clubs, voluntary bodies and associations are complex and inconsistent across Federal, State and Territory anti-discrimination Acts.

At the outset, we note that, when we advise not-for-profit clients in relation to their obligations across Federal, State and Territory legislation, it is necessary to consider whether they are captured by a definition of 'employer', 'clubs' or 'goods and services' under each piece of legislation.

If it is proposed that the consolidation bill will cover volunteers, one option is to do so within the employment context and define 'worker' to include 'unpaid worker or volunteer'. To reduce uncertainty, it could be clarified that it is not the intention that 'clubs' and 'goods and services' provisions cover volunteers. However, if it is intended that volunteers be captured, it is important that any obligations are made clear.

For example, at some not-for-profit organisations, volunteers participate in mentoring programs. As part of this, volunteers undergo a selection process. Depending on the wording of legislation, it could argued that such a practice is a 'service' to the client and that providing the opportunity to mentor a disadvantaged person could be argued to be a 'benefit' of volunteering. Therefore, the selection process could be discriminatory. Consideration should be given to the potential for uncertainty and ambiguity in this context.

As noted in the Discussion Paper, the SDA covers only licensed clubs of not less than 30 members in relation to all protected attributes.[20] This approach is consistent with most State and Territory anti-discrimination Acts.

In contrast, the DDA covers clubs and incorporated associations, broadly defined, in relation to all protected attributes. This approach excludes very small social clubs which do not provide and maintain facilities from the funds of the association, but would cover organisations such as RSL clubs, sports clubs and volunteer groups.

[20] Page 30.

If the DDA approach was adopted, it would expand protection against discrimination in relation to sex to unlicensed clubs and clubs with fewer than 30 members and would generally provide a broader coverage of clubs than under most State and Territory anti-discrimination Acts.

We recommend that consideration be given to the adoption of the SDA approach. As this is consistent with most State and Territory legislation, it will minimise the regulatory burden placed on organisations to comply with obligations under the consolidation bill.

As noted in the Discussion Paper, consideration needs to be given to what, if any, exceptions should be provided.[21] Whichever approach is adopted, it should clearly state that not-for-profit organisations with volunteers are not covered. Currently, provisions are confusing and analysis is required to determine whether or not a particular organisation is covered. This takes time and significant resources for not-for-profit organisations.

4 Exceptions and exemptions

4.1 General limitations

Question 20: Should the consolidation bill adopt a general limitations clause? Are there specific exceptions that would need to be retained?

'The main disadvantage of adopting a general limitations clause is that it could, at least initially, result in increased uncertainty as its application would depend on the interpretation and application of the test by the courts.' [22]

The Discussion Paper suggests that a general limitations clause could replace specific exceptions by clarifying that *'conduct which is necessary to achieve a legitimate objective and is a proportionate means of achieving that objective is not discrimination'.*[23]

The rationale is that it will allow for a more 'case-specific approach' as well as remove the need to grant numerous specific exceptions for particular activities.

Whilst the aim of providing flexibility to adapt to changing standards and community expectations is a noble one, it is counterbalanced by the confusion that a general limitations clause will bring.

Firstly, the meaning and interpretation of 'legitimate objective' is uncertain. What is a 'legitimate objective'? Who determines this? Unless detailed guidelines or examples are provided in the consolidation bill, the definition of the phrase will be subjectively

[21] Page 31.

[22] Discussion Paper, page 37.

[23] Discussion Paper, page 37.

determined by reference to the particular circumstances of a case. Such an approach will create added and needless confusion and uncertainty for organisations.

In our view, there is no need for a general limitations clause in the consolidation bill. Rather, inclusion of a special measures provision encompassing all protected attributes, (outlined at 2 above), is sufficient.

Whilst maintaining permanent exceptions may pose certain disadvantages in relation to inflexibility, a general limitations clause will result in unnecessary costs and uncertainty. Not-for-profit organisations already face difficulties when attempting to predict whether particular conduct is lawful. A general limitations clause will increase this uncertainty and place an overreliance upon courts to delineate what conduct will constitute a special measure.

As the Discussion Paper notes, the Productivity Commission's *Review of the Disability Discrimination Act 1992* (Report No. 30, 2004) highlights that the retention of specific exceptions can provide greater clarity, certainty and reduce potentially unnecessary legal costs.[24] In this vein, we support the continued inclusion of exceptions to reduce ambiguity and provide guidance as to the intention of the Parliament in relation to the consolidation bill.

4.2 Temporary exemptions

Question 23: Should temporary exemptions continue to be available? If so, what matters should the Commission take into account when considering whether to grant a temporary extension?

Currently, the Commission may grant temporary exemptions under the ADA, SDA and DDA to render certain conduct lawful for a specified period of time (up to a maximum of five years).[25]

We support the continued availability of temporary exemptions. They can provide certainty to organisations that they are acting in accordance with the law. Further, they can address unforseen circumstances which have not been anticipated by legislation.

We have no objection to the inclusion in the consolidation bill of a requirement that the Commission must exercise its power to grant temporary exemptions in accordance with the objects of the consolidation bill.

We note that the Commission needs to adopt a streamlined and cost effective way of processing applications for temporary exemptions.

[24] Page 38.

[25] ADA, section 44(1); SDA section 44(1); DDA, section 55(1).

Currently, the Commission publishes guidelines for the ADA, SDA and DDA, outlining for each of those Acts the temporary exemption process, matters that should be included in an application and the criteria that the Commission applies in determining an application.

These guidelines establish that the Commission will consider matters including whether any permanent exemptions apply, if the circumstances are covered by the relevant Act and if they can be brought within that Act's 'special measures' or 'positive discrimination' provisions.

The Commission will also consider the objects of the Act, having regard to:

- the reasonableness of the exemption sought;
- whether the circumstances are within the 'spirit' of any permanent exemptions; and
- whether an exemption could be granted subject to terms and conditions which further the objects of the Act.

In contrast, the *Equal Opportunity Act 2010* (Vic) codifies the factors to be considered by the Victorian Civil and Administrative Tribunal (**VCAT**) in determining an exemption application. These include:

- whether the proposed exemption is unnecessary (for example, because an exemption or exception already applies or the conduct would not amount to prohibited discrimination);
- whether the proposed exemption is a reasonable limitation on the right to equality set out in the *Charter of Human Rights and Responsibilities Act 2006* (Vic); and
- all the relevant circumstances of the case.[26]

Whether or not the approach is codified in legislation, we recommend that consistent guidelines that encompass each ground of discrimination are provided. This includes the publication of readily available, clear guidelines which outline the process, matters to be included and criteria that the Commission will take into account. A further consideration may be whether it is worthwhile clarifying if the Commission will take all relevant circumstances of the case into account, akin to Victoria.

In addition, the administrative burdens associated with applying for temporary exemptions may be lessened if the certification of special measures is adopted (see discussion below at 5).

[26] Section 90.

5 Complaints and compliance framework

Question 24: Are there other mechanisms that would provide greater certainty and guidance to duty holders to assist them to comply with their obligations under Commonwealth anti-discrimination law?

'*Anti-discrimination legislation must be understood, not only by statutory bodies that enforce it, but by all sections of the community because the implications and effects of the legislation could touch us all*.' [27]

We support the view outlined in the Discussion Paper that the lack of certainty around the legality of proposed special measures has discouraged organisations from using them. We have acted in a number of exemption applications where it was *possible* that the proposed course of action was a 'special measure', but it was not certain.

For example, in a recent Victorian case, an Aboriginal organisation sought an exemption to enable it to advertise for and employ only Indigenous persons in health service positions. However, VCAT held that such conduct fell within the special measures provision and because the proposed measure was not discriminatory, no exemption was required.[28]

We support the suggestion that the Commission be empowered to certify a proposed course of action as a special measure for a specified period of time. This certificate could be used as a defence in the event that a discrimination claim is brought. This will be of particular assistance for under-resourced not-for-profit organisations as they generally do not have funds to make exemption applications or seek legal advice.

The provision of readily accessible and user-friendly material is also critical to ensure that organisations understand their rights and obligations under the consolidation bill.

Resources could also be developed to assist not-for-profit organisations to comply with their obligations, such as a best practice guide and brochures to provide to volunteers to explain the concepts and protections available. Distribution of material through volunteering support networks (such as Volunteering Australia and the Office for the Not-for-Profit Sector) will also assist organisations to understand their obligations towards volunteers.

Additionally, education sessions to enable the sector to understand its obligations, the availability of face to face, telephone or online chat guidance as well as assistance to seek certification or prepare exemption applications where necessary would be welcomed.

---

[27] *HREOC v Mt Isa Mines Limited* (1993) 46 FCR 301 at 326 per Lockhart J.

[28] *Cummeragunja Housing & Development Aboriginal Corporation (Anti-Discrimination Exemption)* [2011] VCAT 2237.

The continued availability of Commission material online will also assist. An online database of the Commission's decisions (with a one-line summary of the conduct and a link to the decision) would also assist organisations to quickly establish whether (and if so, how) their type of proposed conduct has been dealt with previously by the Commission.

As outlined in our introduction, we welcome the proposal to develop a consolidation bill. To minimise the impact on not-for-profit organisations, it will be critical to ensure that their obligations are made clear and easy to understand without placing further regulatory burdens upon the sector.

6 Contact

For any comments or enquiries in relation to this submission please contact:

- Kate Jenkins, Partner [contact details removed]
- Lisa Croxford, Special Counsel [contact details removed]
- Sara Summerbell, Solicitor [contact details removed]
- Susanne Audsley, Solicitor [contact details removed]
- Alexandra Malon, Solicitor [contact details removed]

Freehills

Sydney
MLC Centre Martin Place Sydney NSW 2000 Australia
Telephone +61 2 9225 5000 Facsimile +61 2 9322 4000

Melbourne
101 Collins Street Melbourne Vic 3000 Australia
Telephone +61 3 9288 1234 Facsimile +61 3 9288 1567

Perth
QV.1 Building 250 St Georges Terrace Perth WA 6000 Australia
Telephone +61 8 9211 7777 Facsimile +61 8 9211 7878

Brisbane
Central Plaza One 345 Queen Street Brisbane Qld 4000 Australia
Telephone +61 7 3258 6666 Facsimile +61 7 3258 6444

Singapore
10 Collyer Quay #15-08 Ocean Financial Centre Singapore 049315
Telephone +65 6236 9939 Facsimile +65 6538 2575

Associated offices
Jakarta Beijing Shanghai Hanoi Ho Chi Minh City

www.freehills.com

MTE125347