Ai GROUP SUBMISSION

Senate Standing Committee on Legal and Constitutional Affairs

Inquiry into the *Anti-Discrimination and Human Right Legislation Amendment (Respect at Work) Bill 2022*

13 October 2022

Ai GROUP

Introduction

The Australian Industry Group (**Ai Group**) welcomes the opportunity to make a submission to the Legal and Constitutional Affairs Senate Committee's inquiry into the *Anti-Discrimination and Human Rights Legislation Amendment (Respect at Work) Bill 2022* (**Bill**).

Ai Group acknowledges and supports the extensive and important work of the Sex Discrimination Commissioner, Kate Jenkins, and her team at the Australian Human Rights Commission (**AHRC**) in preparing the *Respect@Work* Report. The Report is of significant public importance and following the global *#MeToo* movement, created a turning point for how the community and workplaces view sexual harassment.

The Bill reflects the Australian Government's election commitment to implement the outstanding legislative amendments contained in the Sex Discrimination Commissioner's ***Respect@Work Report.***

The recommendation relating to prohibiting sexual harassment under the *Fair Work Act 2009* (Cth) (**FW Act**), however, is not included in this Bill. The Australian Government has announced that this will be addressed in amendments to the FW Act later this year.

The Bill introduces changes to the *Sex Discrimination Act 1984 (Cth)* (**SD Act**) and the *Australian Human Rights Act 1986 (Cth)* (**AHRC Act**) recommended by the *Respect@Work* Report, including:

- Making it unlawful for a person to subject another person to a workplace environment that is hostile on the ground of sex, (and clarifying what many Court decisions have found to be unlawful sexual harassment).

- Creating a new statutory "positive duty" on employers and persons conducting a business or undertaking (**PCBU**) to take reasonable and proportionate measures to eliminate, as far possible, unlawful sex discrimination, workplace sexual harassment and acts of victimisation.

- Empowering the Australian Human Rights Commission (**AHRC)** with an inquiry function in relation to a person's compliance with the positive duty and conferring specific powers on the AHRC to issue compliance notices specifying actions(s) to be taken, applying to the federal courts to direct compliance and to enter enforceable undertakings with non-compliant persons.

- Empowering the AHRC with a broad inquiry function to inquire into systemic unlawful discrimination or suspected unlawful discrimination.

- Enabling representative bodies to make representative applications on behalf of people who have experienced unlawful discrimination in the federal courts.

- Introduce a cost protection provision in the AHRC Act to provide greater certainty to parties

during court proceedings in relation to costs, such that the default position would be that each party bears their own costs in an unlawful discrimination proceeding.

- Expanding the employer reporting framework under the *Workplace Gender Equality Act 2012 (Cth)* to include Commonwealth public sector employers. Currently reporting obligations are limited to private sector employers with 100 or more employees. This amendment was also consistent with recommendation 43 of the *Respect@Work* Report.

The National Inquiry into Sexual Harassment in Australian Workplaces (**National Inquiry**) found that 33% of people who had been in the workforce in the preceding five years had experienced workplace sexual harassment (39% of women and 26% of men). The National Inquiry also found that of those persons who reported experiencing workplace sexual harassment, only 17% came forward to inform their employer. This has focused attention on how the legal framework regulating workplace sexual harassment serves to prevent harassment in the first place.

Ai Group acknowledges the mandate for the Australian Government to implement the Bill and we support the policy intent behind it.

However, the Bill as currently drafted, poses unintended consequences of public importance.

- The Bill does not deliver a consistent national standard of sexual harassment prevention for employers. Measures, such as detailed guidance material, are needed to accurately clarify the interaction with the Bill's positive duty and WHS laws. This is to ensure employers and PCBUs, who in good faith comply with the Bill's positive duty, are not potentially placed in breach of WHS laws as enforced by State and Territory Governments.

- The Bill places the AHRC in conflict by inappropriately continuing the AHRC's exercise of its impartial conciliation functions of complaints of unlawful sex discrimination and sexual harassment, while enabling the AHRC to exercise a compliance function when it reasonably suspects non-compliance with the associated positive duty in section 47C.

- The Bill does not contemplate the interaction with the yet to be enacted recommendation 28 (the prohibition of sexual harassment in the FW Act), such that an additional regulator to enforce compliance, the Fair Work Ombudsman, would likely be enlivened, in addition to a complaints or disputes resolution jurisdiction of the FWC. It is unclear how this recommendation, if enacted, would operate cohesively and consistently with the Bill's provisions; namely section 47C and enforcement and compliance functions of the AHRC.

- The Bill contains insufficient safeguards in respect of the AHRC's broad inquiry functions in respect of systemic discrimination and requires further clarification on the rights of individuals in respect of the AHRC's powers relating to section 35B and 35M.

We also note the Explanatory Memorandum to the Bill does not provide a separate Regulatory Impact Statement (**RIS**) on the basis the *Respect@Work* Report has been certified as by the

Attorney-General's Department as meeting the (RIS) requirements. This announcement was on 27 September 2022 when the Bill was introduced into Parliament.

Ai Group considers that there will be an increased regulatory burden on employers arising from the outcomes of recommendation 35 of the *Respect@Work* Report in respect of changes to WHS laws. While recommendation 35 is not included in the Bill, we anticipate that complexity in the legal framework for employers will increase as a result of employers being required to navigate two different frameworks regulating harassment prevention; that of the Bill's changes to the SD Act and model WHS laws and regulation enforced by States and Territories.

This outcome does not remedy the *Respect@Work* Report's findings that the existing legal framework is already too complex and difficult to navigate.

Ai Group considers its amendments set out in **Schedule A** are necessary to limit the Bill's unintended consequences while preserving its policy intent.

With these amendments, Ai Group would not oppose the Bill.

Ai Group's support for the *Respect@Work* reforms

The work of the Sex Discrimination Commissioner, Kate Jenkins, and her team at the Australian Human Rights Commission (**AHRC**) in preparing the *Respect@Work* Report, is of significant public importance in changing how workplace sexual harassment is viewed and addressed in the community.

The Report followed an extensive National Inquiry conducted by the Commissioner and commissioned by the then Minister for Women, The Hon. Kelly O'Dwyer in 2018.

Ai Group was a leading contributor for employers in the National Inquiry. Ai Group's Chief Executive, Innes Willox, was appointed to the National Inquiry's Member Reference Group with Ai Group facilitating a range of employer consultations with the Commissioner to share employer experiences in both preventing and responding to cases of sexual harassment.

Ai Group made a detailed submission to the National Inquiry calling for a range of reforms to eliminate sexual harassment from our community and to better support employers who are currently constrained by a complex legal framework in preventing and addressing complaints.

A number of our recommendations relating to the complexity of the current legal framework, the constraints on employer actions under unfair dismissal laws, and the need for greater Government funding in community education and preventative initiatives were adopted in the *Respect@Work Report* and supported by the former Australian Government.

Ai Group supported the first tranche of legislative reforms in the *Sex Discrimination and Fair Work (Respect at Work) Amendment Act 2021 (Cth)* that became operative on 10 September 2021.

Since then, Ai Group has been appointed by the Australian Government as a member of the

Respect@Work Council, chaired by the Sex Discrimination Commissioner, in relation to progressing various recommendations of the *Respect@Work* Report.

Ai Group is also an appointed member representing employers on Safe Work Australia and an appointed member of the Victorina Government's Sexual Harassment Taskforce. Our submission is informed by our work and policy expertise in both fields of workplace relations, law and work, health and safety.

Ai Group will continue to play an important role in the work of the Council and in promoting the importance of sexual harassment prevention in Australian industry.

Duty to eliminate unlawful sexual discrimination etc (the 'positive duty')

Section 47C of the Bill sets out the positive duty on employers and PCBUs to take reasonable and proportionate measures to eliminate, as far as possible, unlawful sex discrimination, sexual harassment (including harassment on the ground of sex), hostile working environments and acts of victimization.

Matters to be taken into account in determining whether a duty holder complies with the positive duty set out in section 47(6) and are as follows:

(a) The size, nature and circumstances of the duty holder's business or undertaking;

(b) The duty holder's resources, whether financial or otherwise;

(c) The practicability and the cost of steps to eliminate conduct covered by duty;

(d) Any other relevant matter.

What constitutes the positive duty?

The Bill does not identify what would constitute activity to discharge the positive duty under section 47C. We note the Explanatory Memorandum helpfully states the following examples that would be indicative of employers and PCBUs complying with the positive duty. These include:

At paragraph [118] for a small delivery business with 8 employees:

> "…Joe is aware of the risk of his employees experiencing discriminatory conduct while at work, including by customers. Given the nature of his business, Joe writes a short policy on harassment and discrimination, including how a complaint would be handled and responding to inappropriate conduct by customers. Joe discusses the policy during a staff meeting and provides a printed copy to all staff. Joe also regularly checks in with his staff to discuss rostering, leave and other matters, including any behavioural issues. As a result of these measures, Joe is likely to be compliant with the positive duty under section 47C in the circumstances."

At paragraph [119] for owners of a large hotel in a ski resort with 60 employees who are largely part-time or casual:

> "Aida and Daniel recognise the risks associated with short-term work and develop an action plan for complying with the positive duty. As part of this plan, Aida and Daniel task their human resources officer with developing a policy on harassment and discrimination and ensuring this is part of the onboarding process for new staff. Aida and Daniel also require managers to complete externally-provided training on harassment and discrimination on an annual basis. The managers are then responsible for ensuring their staff are aware of the policy and reiterating behavioural standards. As a result of these measures, Aida and Daniel are likely to be compliant with the positive duty under section 47C in the circumstances."

And at paragraph [120] for a technology company that employs more than 250 staff who work remotely in small teams:

> "To ensure Future IT is meeting its obligations under the positive duty, Ben is responsible for implementing a strategic plan on harassment and discrimination. The plan includes confidential staff surveys, data collection on complaints, regular reviews of existing policies and procedures, and mandatory training for managers and new staff on harassment and discrimination. To mitigate the risks associated with a remote workforce, Ben also develops and circulates specific guidance on harassment and discrimination in a remote context and the supports available to staff. As a result of these measures, Future IT is likely to be compliant with the positive duty under section 47 in the circumstances."

The Bill's section 35A(a) amends the AHRC Act to confer functions on the AHRC to prepare and to publish guidelines for complying with the positive duty in relation to sex discrimination. These examples are essential in framing those guidelines that must operate within the ambit of the Bill's intent as described in those paragraphs.

The relationship between the positive duty and the SD Act's vicarious liability provision

The policy rationale for the positive duty is to prevent workplace sexual harassment (and unlawful discrimination) by placing emphasis on the employer in assuming responsibility to prevent the conduct rather than burdening affected employees to make a complaint. As a matter of logic and fairness, it makes no sense for a positive duty to require employers to take reasonable and proportionate measures to eliminate unlawful sex discrimination etc (as described in section 47C) as far as possible, but to not provide that the discharge of this duty protects an employer from vicarious liability under section 106.

In other words, the positive duty in section 47C could quickly become redundant if a Court made a finding that an employer was vicariously liable for proceedings against in respect of sexual harassment but that the employer had satisfied section 47C in respect of preventing it, particularly where the AHRC had endorsed or accepted compliance activity in response to a compliance notice.

It is essential that the relationship between the positive duty in section 47C and the SD Act's current vicarious liability provisions in section 106 be aligned.

To this end, we note paragraph [15] of the Bill's Explanatory Memorandum states:

> "The positive duty is intended to align with section 106 of the SD Act, which relates to the vicarious liability of employers for unlawful acts done by their employees or agents."

The Explanatory Memorandum in this regard is helpful and welcome for both employers, but also, we expect, the judiciary whose role it is to determine liability in cases of unlawful sex discrimination etc before it.

However, to eliminate doubt and for clarity for the judiciary, we consider that paragraph [15] of the EM set out above, also be inserted to section 106 of the SD Act itself. This proposed amendment is set out in **Schedule A.**

The interaction between the positive duty and other statutory duties or preventative provisions

It is incorrect to assume that this Bill delivers a consistent national framework to support employers prevent sex discrimination and workplace sexual harassment.

In the absence of a mutual recognition mechanism between the SD Act and WHS laws, the Bill seeks to provide a preventative framework for the purposes of the SD Act only. Complying with the Bill does not necessarily result in compliance with model WHS laws, including the new psychosocial risks model regulation. In fact, it is entirely possible for PCBUs to comply with section 47C in good faith, and to be in breach of WHS laws as enforced by States and Territories.

The WHS legal framework is one that imposes statutory duties on various persons, including PCBUs, with WHS regulators empowered with functions to prosecute duty holders for breaches of WHS duties under the Act or Regulations. Criminal penalties, including terms of imprisonment, can apply.

The application of the WHS framework to workplace sexual harassment was acknowledged in the *Respect@Work* Report; WHS laws have always included a duty to manage risks arising from psychosocial hazards, under the general duty in the Act. This was built on in the *Respect@Work* Report at recommendation 35:

> **Work, health and safety**
>
> **New Regulation, Code or guideline**
>
> WHS ministers agree to amend the model WHS Regulation to deal with psychological health, as recommended by the Boland Review, and develop guidelines on sexual harassment with a view to informing the development of a Code of Practice on sexual harassment. Sexual harassment should be defined in accordance with the Sex Discrimination Act.

Developments arising from the *Respect@Work Report's* recommendation 35 have resulted in specific obligations being included in the Regulations including a list of relevant matters that must

be considered when implementing controls to eliminate or minimise so far as reasonably practicable risks to psychological injury. This includes psychosocial risks associated with workplace sexual harassment, as clearly outlined in current Safe Work Australia guidance, published in 2021. These have also resulted in various State and Territories creating their own Codes of Practice specifically relating to sexual harassment prevention. These codes can be used in evidence if a duty holder is being prosecuted for breach of the Act.

On 14 April 2022 SWA amended the Model WHS Regulation to specifically address psychosocial risks and harm. In August 2022, Safe Work Australia (**SWA**) published a Model WHS Code of Practice for Managing Psychosocial Hazards at Work. This follows the earlier amendment of the Model WHS Laws to include Regulations related to the management of psychosocial risks.

SWA is also reviewing the incident notification provisions in the model WHS laws to specifically reference work-related psychological injuries and illnesses. These include workplace sexual harassment.

In the absence of a mutual recognition mechanism, the two frameworks under the SD Act and WHS laws are different for employer obligations, notwithstanding that they each cover sexual harassment would cover some overlap in compliance activity.

It is essential that it be made clear that compliance activity satisfying section 47C may not result in satisfying WHS obligations in respect of unlawful discrimination and harassment.

It is essential that documentation or material from the AHRC or foreshadowed *Respect@Work Hub* contain a similar statement to avoid employers and PCBUs who in good faith, rely on complying with section 47C, only to find that their compliance activity does not meet the standard of prevention demanded by model WHS regulations or enforceable codes relating to sexual harassment as may be enforced by State and Territory WHS regulators and for which they may be prosecuted.

These matters will also need to be revisited if or when recommendation 28 is implemented and the FWO and FWC have prepared their own material in respect of their institution's approach to prohibiting sexual harassment.

The dual enforcement and conciliation powers on the AHRC is inappropriate

The perception of impartiality is integral to the community's confidence in the Australia's legal framework, and this is supported by a clear separation of enforcement powers and resolution functions.

The Bill unfairly and inappropriately continues the role of the AHRC in exercising its conciliation functions of complaints of unlawful sex discrimination and sexual harassment while creating a compliance function for the AHRC in respect of the associated positive duty at section 47C. In doing

so, the AHRC is in conflict in providing an impartial, independent and conciliation function in response to a complaint under section 11 of the AHRC Act, while also able to exercise its inquiry and enforcement power under section 35B, if the AHRC reasonably suspects that a person is not complying with section 47C based on a complaint made to its organization.

Indeed, the EM at paragraph [21] makes it clear that "*advice provided by other regulators, information disclosed by impacted individuals, or media reporting*" may be this basis on which the AHRC forms the view that it reasonably suspects that a duty-holder is not complying with section 47C. This seems to extend to when the AHRC receives a complaint where a simultaneous process of conciliation and enforcement may occur.

The practical effect of the Bill is likely to discourage employers and PCBUs from engaging in the AHRC's conciliation process based on genuine concerns that:

(a) Information disclosed during conciliation would be used directly or indirectly by the AHRC in respect of any concurrent inquiry and enforcement functions under section 35B for the positive duty in section 47C;

(b) The enforcement power under section 35B could be used as a consequence of a failed conciliation notwithstanding that the individual complainants do not have standing to commence such action.

The Bill provides no safeguards to prevent these concerns eventuating.

While Ai Group is aware that the terms of the positive duty is largely based on Part 3 of the *Equal Opportunity Act 2010 (Vic),* that Act does not confer regulatory powers on the Victorian Equal Opportunity and Human Rights Commission (VEOHRC) as proposed by recommendation 18.

Ai Group considers it inappropriate for the AHRC to acquire regulatory and enforcement powers if it is to maintain its independence as a complaints body equipped to impartially resolve complaints. We note there is an established institutional separation of these functions in workplace matters between the FWC and the Fair Work Ombudsman (FWO) and this provides parties with confidence that workplace grievances and disputes will be managed fairly.

If recommendation 18 is adopted to confer regulatory powers on the AHRC, it is essential that parties to a particular complaint can unilaterally seek to have the matter dealt with by an impartial Court of competent jurisdiction. In other words, the complaint handling process should proceed to conciliation by the AHRC only if both parties agree. Various powers of the AHRC in respect of its complaint handling process should also be reviewed to ensure that any complaints resolution jurisdiction only applies to complaints with the informed consent of both parties.

To this end, section 11(1)(aa) of the AHRC Act should be amended to limit conciliation for complaints of unlawful sex discrimination etc to where parties have consented.

A further reason for limiting conciliation before the AHRC by consent, is the outstanding recommendation 28 of the *Respect@Work Report* excluded from the Bill. The Australian Government's Jobs and Skills Summit Outcomes document states as a complementary existing commitment:

> Implement recommendation 28 of the Respect@Work Report by expressly prohibiting sexual harassment in the workplace and enabling the Fair Work Commission to resolve disputes relating to workplace sexual harassment

If this recommendation is to proceed, then the need for the AHRC to continue its required conciliation (other than by consent) is significantly reduced, given the potentially expanded jurisdiction of the FWC.

Our concern is also with the Bill's costs provision in section 46PSA(3)(b) in referencing the conduct of the parties to the proceedings (including any conduct of the parties in dealings with the Commission). This effectively places pressure on parties to engage in the conciliation process, notwithstanding the concerns described above regarding impartiality and due process. The Bill does not provide appropriate safeguards. Section 46PSA(3)(b) of the Bill must be amended as set out in **Schedule A.**

The AHRC's broad inquiry functions into systemic discrimination

The Bill's section 35L provides new functions on the AHRC to inquire into any matter that may relate to systemic unlawful discrimination or suspected systemic unlawful discrimination. Systemic unlawful discrimination is defined as unlawful discrimination affecting a class or group of persons and is continuous, repetitive or forms a pattern.

The AHRC may perform its inquiry function when the AHRC is requested to do so by the Minister; or it appears to the AHRC "*to be desirable to do so*."

In exercising this inquiry function, the AHRC is empowered by existing sections 21, 22, 23, 24 and 26(1) of the AHRC Act. These powers include the powers to obtain documents and the powers to examine witnesses, against which the failure to comply without a reasonable excuse is an offence attracting a financial penalty.

In light of this, it is appropriate that the community is not subjected to these powers merely because an institution considers it desirable to exercise them on the basis that a matter *may* relate to a particular subject matter.

Section 35M should be amended to say:

The Commission may perform the functions referred to in paragraph 35L(1)(a) when:

(a) the Commission is requested to do so by the Minister; or

(b) <u>it is in the public interest and</u> it appears desirable to the Commission to do so. (amendment underlined).

While many matters of systemic unlawful discrimination are likely to be in the public interest, a public interest safeguard should be written into the legislation in circumstances when an institution is empowered to compel information from citizens. Section 35B in respect of the AHRC inquiring into the positive duty, is limited to where the AHRC reasonably suspects non-compliance. A limitation regarding the public interest as we have sought should be added to section 35M(b).

Additional clarifications are needed on the AHRC's inquiry powers regarding the positive duty and systemic unlawful discrimination

Sections 35D and 35N of the Bill confirm the application of the Commission's powers under sections 21, 22, 23 and 24 in respect of the new AHRC inquiry functions in relation to systemic unlawful discrimination and suspected non-compliance with the positive duty.

It must be considered that in exercising its inquiry functions, the Commission may be receiving information that impacts the broader legal rights and obligations of the parties and that further protections are needed, for example under defamation law, WHS laws or any subsequent amendments in the FW Act.

Persons subject to the inquiry and enforcement functions of existing regulators, such as the FWO and WHS regulatory bodies are not required to provide information that is the subject of legal professional privilege (see for example, section 713AA of the FW Act.)

A similar amendment is needed here. Ai Group suggests a new subsection 23(4) to the AHRC Act as follows:

> ***23(4) Legal Professional Privilege***
> *Nothing in this Division requires a person to produce a document that would disclose information that is the subject of legal professional privilege.*

We also suggest that there be some immunity provided to persons compelled to participate in the Inquiry process, that go beyond the reasonable excuse provisions in section 23(3). For example, section 712D of the FW Act provides:

> ***Protection from liability relating to complying with the Commission's functions***
> *A person who, in good faith, gives information, produces a record or document, or answers a question, when required to do so under the Commission's functions in this Division, is not liable to:*
> *(a) Any proceeding for contravening any other law because of that conduct;*
> *(b) Civil proceedings for loss, damage or injury of any kind suffered by another person because of that conduct.*

A similar provision should be inserted into section 23 of the AHRC Act.

In addition, the Bill's enforceable undertaking provisions in section 35K is problematic. There is no connection with how an enforceable undertaking is to interact with the issuing of compliance

notices; how it fits within the Commission's broader inquiry and enforcement powers or how it is aligned with the SD Act's vicarious liability provision in section 106.

Ai Group does not see the need for an additional power on the Commission to issue an enforceable undertaking given the Bill's compliance notice provisions, but if despite this, the section remains, then a new subsection 35FF is needed:

> ***Section 35FF Relationship with enforceable undertakings***
> *The President must not give a person a compliance notice if:*
> *(a) The person has given an undertaking under section 35K in relation to the enforceable provision; and*
> *(b) The undertaking has not been withdrawn.*

A similar provision exists in the FW Act in respect of the FWO's powers to issue compliance notices and enforceable undertakings. Some alignment with the FW Act must be considered, particularly if recommendation 28 relating to prohibiting sexual harassment in the FW Act is later enacted.

Government's intent to legislate a prohibition of sexual harassment in the FW Act

As referred above, recommendation 28 of the *Respectat@Work* Report referred to prohibiting sexual harassment in the FW Act. That recommendation is not included in the Bill, with the Government announcing that it will be dealt with separately in changes to the FW Act.

Ai Group is concerned about the interaction with any such amendment (whatever it may look like), the Bill's provisions and WHS laws. The enlivening of the FWO's regulatory powers and the possible expansion of the FWC's jurisdiction raises real questions as to how the FW jurisdiction is to operate cohesively with the AHRC.

It is difficult to see how the *Respect@Work* Report's findings that the legal framework was overly complex and difficult to navigate would be alleviated by the Government enacting further legislative change in separate jurisdictions.

Ai Group looks forward to further consultation with the Australian Government on this issue.

Expanding of reporting obligations under the WGE Act to public sector organisations

Ai Group notes the Bill's separate amendment to the WGE Act to expand reporting obligations currently on relevant private sector employers to include relevant public sector organisations.

Ai Group supports the inclusion of public sector organizations in the definition of relevant employer in the WGE Act.

Conclusion

Ai Group acknowledges the Government's mandate to implement the outstanding recommendations of the *Respect@Work* Report and we support the policy intent of the Bill.

The Bill, however, has some important unintended consequences. We have suggested targeted amendments. These amendments are set out in **Schedule A.**

With these amendments, Ai Group would not oppose the Bill.

ABOUT THE AUSTRALIAN INDUSTRY GROUP

The Australian Industry Group (Ai Group®) is a peak employer organisation representing traditional, innovative and emerging industry sectors. We are a truly national organisation which has been supporting businesses across Australia for nearly 150 years.

Ai Group is genuinely representative of Australian industry. Together with partner organisations we represent the interests of more than 60,000 businesses employing more than 1 million staff. Our members are small and large businesses in sectors including manufacturing, construction, ICT, transport & logistics, engineering, food, labour hire, mining services, the defence industry and civil airlines.

Our vision is for thriving industries and a prosperous community. We offer our membership strong advocacy and an effective voice at all levels of government underpinned by our respected position of policy leadership and political non-partisanship.

With more than 250 staff and networks of relationships that extend beyond borders (domestic and international) we have the resources and the expertise to meet the changing needs of our membership. Our deep experience of industrial relations and workplace law positions Ai Group as Australia's leading industrial advocate.

We listen and support our members in facing their challenges by remaining at the cutting edge of policy debate and legislative change. We provide solution-driven advice to address business opportunities and risks.

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