



# ADVOCACY

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## Policy Consultation Feedback

**Date:** 12 October 2026  
**To:** [employment-policy@unimelb.edu.au](mailto:employment-policy@unimelb.edu.au).  
**Subject:** Feedback on proposed changes to the *Appropriate Workplace Behaviours Policy* (MPF1324)

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### 1. Introduction

The University of Melbourne Student Union (UMSU) supports the University's commitment to preventing and responding to racism in the workplace and endorses the stated objectives of the proposed amendments. UMSU has a longstanding and proud history of campaigning against racism at the University and advocating for measures that promote safety, inclusion and equal participation for all members of the university community. Additionally, UMSU has a direct interest in this policy given students are affected by the conduct of university staff, many students are themselves employees or other workers of the University, and the amendments form part of a broader reform process being undertaken concurrently with proposed changes to the *Student Conduct Policy* (MPF1328).

Notwithstanding our support, UMSU does not consider the draft suitable for approval in its current form. The proposed amendments introduce a number of substantive changes that are not identified in the consultation materials, and they are significant, including converting aspirational institutional values into enforceable standards of conduct, adopting definitions and exemptions that are inconsistent with those proposed in the corresponding student policy reforms, and relying on legislative provisions that have since been repealed.

### 2. Summary of Recommendations

1. Reissue the draft with a tracked-changes version for full transparency.
2. Frame the 'University Values' as aspirational.
3. Restore the current academic freedom protections.
4. Align definitions and safeguards with the Student Conduct Policy.
5. Move key racism safeguards into the policy itself.
6. Strengthen protections for lawful expression and free speech.
7. Clarify and simplify the racism definition.
8. Revise the Islamophobia and Aboriginal and Torres Strait Islander racism definitions.
9. Clarify how the policy applies to students who are also workers.
10. Increase transparency for student disclosers.
11. Add a transitional provision for historic conduct.



## Key concerns

### 2.1. All substantive changes are not identified

The explanatory note identifies only two substantive changes - the introduction of new definitions of particular forms of racism and the incorporation of the 'University Values'. However, the draft makes at least eight additional substantive amendments that are not disclosed in the consultation materials. Coupled with the absence of a tracked changes version of the current policy – this places a significant burden on stakeholders and the likely effect is that they are not being consulted on the full scope and effect of the proposed changes. UMSU considers that significant amendments should be clearly identified and explained in the explanatory materials so that consultees can provide informed feedback on the proposal as a whole.

| Section                          | Current policy                                                                                                                                                              | Consultation draft                                                                                        |
|----------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------|
| <b>1.1(c)</b>                    | No equivalent                                                                                                                                                               | New objective to support behaviours that affirm the University's values                                   |
| <b>4.2, 4.3</b>                  | Values describe the University's institutional commitments                                                                                                                  | New values expressed as personal attributes, and a Values Framework that may be updated from time to time |
| <b>4.4(b)</b>                    | Academic freedom protected "so that all scholars at the University are free to engage in critical enquiry, scholarly endeavour and public discourse without fear or favour" | Qualifying words removed                                                                                  |
| <b>Former 4.8(h)</b>             | Employees must comply with the conditions of their employment or engagement                                                                                                 | Deleted, and the paragraph is no longer numbered                                                          |
| <b>4.18(b), 7</b>                | Racism "including but not limited to" racial discrimination, harassment, vilification and offensive behaviour because of race, colour or national or ethnic origin          | Closed definition of Racism that also extends to religion                                                 |
| <b>5.6(e)</b>                    | No equivalent                                                                                                                                                               | Fraud added to conduct that may be criminal                                                               |
| <b>7 (protected attribute)</b>   | No equivalent                                                                                                                                                               | Expunged homosexual conviction added                                                                      |
| <b>7 (gender-based violence)</b> | Defined by reference to MPFI359                                                                                                                                             | Definition text reproduced                                                                                |

Some of the undisclosed amendments are relatively minor or uncontroversial. For example, the inclusion of expunged homosexual convictions as a protected attribute aligns the policy with contemporary anti-discrimination protections and is supported by UMSU. Other amendments, however, alter the scope of the policy and the standards of conduct expected of staff.



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The explanatory note states that the amendments “clarify and strengthen the existing policy framework rather than create a new category of prohibited conduct”. In our view, that characterisation is incomplete. The draft expands the definition of racism to encompass conduct based on religion and replaces the current non-exhaustive description of prohibited conduct with a closed definition. These changes affect the substantive operation and scope of the policy, rather than merely clarifying existing provisions. As such, they should be expressly identified and explained in the consultation materials so that stakeholders can properly assess their implications.

### **Recommendation 1**

UMSU recommends that the University reissue the draft with a tracked-changes comparison against the current policy, and consults on all substantive changes, not only those identified in the explanatory note.

## **2.2. The Values should not operate as disciplinary standards (ss.4.2-4.4)**

Section 4.2 replaces the University's existing values, which describe institutional commitments, with three values framed as personal attributes - *Connected*, *Curious* and *Courageous*. These values refer to concepts such as humility, openness to learning, continuous improvement, courage and constructive challenge. UMSU does not object to the University adopting these values as statements of institutional culture and aspiration.

However, the draft continues the requirement, contained in the current policy, that employees “uphold the values of the University set out at section 4.2”. That obligation appears in the unnumbered paragraph under *Personal and professional behaviour*. Section 4.8 further provides that a contravention of the policy may constitute inappropriate behaviour, misconduct or serious misconduct.

In the current policy, this obligation attaches to values expressed as institutional commitments, including maintaining high ethical standards, supporting human rights and academic freedom, and fostering a respectful workplace. Those commitments could reasonably be connected to identifiable standards of conduct. The draft replaces those commitments with broad personal attributes while retaining the obligation to uphold them. In effect, the policy transforms aspirational qualities into enforceable behavioural standards.

On its face, the draft permits disciplinary action on the basis that an employee has failed to demonstrate sufficient curiosity, humility, courage or openness to learning. Such concepts may have value as aspirations, but they are inherently subjective and cannot be applied as disciplinary standards with sufficient certainty. Employees should be able to identify in advance the conduct expected of them and the conduct that may expose them to disciplinary consequences.

Section 4.3 compounds this concern. It refers to a ‘Values Framework’ and related resources that “may be reviewed and updated from time to time”. Because the policy requires employees to uphold the values, amendments to the Framework could effectively alter the standards to which employees are held without policy amendment or consultation. Standards capable of supporting disciplinary action should be contained in the policy itself and subject to the University's ordinary governance processes.

Section 4.4 creates further uncertainty by listing principles that employees are “expected to uphold through their conduct and interactions” without making clear whether those principles are intended to be enforceable standards of conduct or statements of institutional commitment.



If they are intended to impose behavioural obligations, they should be drafted as clear and specific conduct requirements. If they are intended to be aspirational, the policy should make that explicit and should not link them to disciplinary consequences.

## **Recommendation 2**

UMSU recommends that the policy state that the University's values and the principles in s 4.4 are aspirational and do not of themselves form a basis for a finding of misconduct. The requirement to "uphold the values" should be deleted or confined to conduct that also breaches a specific standard in this policy. Section 4.3 should state that changes to the 'Values Framework' do not alter the standards of conduct in this policy unless the policy itself is amended.

### **2.3. Academic freedom has been narrowed (s.4.4(b))**

The current policy commits the University to preserving, defending and promoting academic freedom "so that all scholars at the University are free to engage in critical enquiry, scholarly endeavour and public discourse without fear or favour". The draft removes these words without explanation.

In UMSU's view, this is not simply a drafting change because the deleted text articulates the purpose of academic freedom and the interests it is intended to protect. It makes clear that academic freedom exists to safeguard robust inquiry, teaching, research and public debate, including where those activities involve contestable, controversial or challenging ideas.

The removal of this language is particularly significant in the context of the proposed racism amendments. The new provisions will inevitably require decisions about the boundary between prohibited conduct and legitimate teaching, research, political expression and scholarly debate, including by graduate researchers and students employed in teaching roles.

The deleted text serves an important interpretive function by making clear that academic freedom exists to protect critical enquiry, scholarly endeavour and public discourse, particularly where discussion is contentious, politically charged or uncomfortable. Without that guidance, there is a greater risk that the policy could be invoked to challenge or restrict lawful academic and political expression, including discussion of racial justice, colonialism, Palestine, the state of Israel, or other matters of significant public debate.

UMSU is concerned that broader definitions of racism, if not accompanied by equally clear protections for academic freedom, may encourage complaints that seek to characterise disagreement with political positions, criticism of states or institutions, or discussion of structural power and privilege as racist conduct. The purpose of academic freedom is not to shield discriminatory conduct, but to ensure that controversial ideas can be examined, tested and debated without fear of disciplinary consequences.

Introducing expanded racism provisions while simultaneously removing language emphasising the protection of critical enquiry and public discourse therefore sends an unhelpful signal about the balance the University intends to strike. If no change in that balance is intended, the wording of the current policy should be retained.



## Recommendation 3

UMSU recommends restoring the words “so that all scholars at the University are free to engage in critical enquiry, scholarly endeavour and public discourse without fear or favour” in s.4.4(b).

## 3. Racism provisions

UMSU supports a clear prohibition on racism in all its forms. UMSU also supports the University's objective of implementing the Higher Education Standards Framework and strengthening its response to racism. However, where a policy regulates expression, teaching, research, scholarship and public debate, the limits of those protections and the safeguards for lawful expression should be stated in the policy itself. They should not be left to explanatory materials that do not form part of the disciplinary framework.

The proposed amendments rely heavily on the explanatory note to qualify the operation of the racism provisions. The explanatory note contains important assurances about how the policy will be interpreted and applied, but those assurances are largely absent from the policy itself. This creates uncertainty for staff, students who are also employees, and future decision-makers.

### 3.1. The two policies should be consistent

The explanatory note describes the amendments to this policy and the *Student Conduct Policy* as a single reform intended to implement the Higher Education Standards Framework. However, the two drafts adopt materially different definitions and drafting approaches.

| Provision                                                           | Student Conduct Policy draft            | This draft                                         |
|---------------------------------------------------------------------|-----------------------------------------|----------------------------------------------------|
| <b>Definition of Racism</b>                                         | Race, colour, national or ethnic origin | Also includes religion                             |
| <b>Racism towards Aboriginal and Torres Strait Islander peoples</b> | Marked “[pending]” – unknown content    | Full definition included                           |
| <b>Antisemitism</b>                                                 | Incorporated by reference only          | Part of the Universities Australia text reproduced |

Students who are employees or other workers of the University may be subject to both policies simultaneously, as expressly recognised by s.2.5 of the *Student Conduct Policy* draft. Consequently, it's difficult to justify a situation in which the same conduct may constitute racism under one policy but not the other.

Consistency is particularly important because the University is representing these amendments as a single reform. If a common institutional standard is intended, the definitions, exemptions and interpretive provisions should align.



## Recommendation 4

UMSU recommends that the University adopt identical definitions, exemptions and interpretive provisions in both policies, and consult students and staff on the same text, including the proposed definition of racism towards Aboriginal and Torres Strait Islander peoples.

### 3.2. The protections belong in the policy (s.4.19)

The explanatory note makes four substantive commitments that are absent from the policy:

- the definitions are not determinative of whether conduct constitutes racism;
- the policy does not create a hierarchy of racisms;
- the definitions do not operate as separate offences; and
- criticism of Israel, its government, policies or actions is not, in itself, antisemitic.

UMSU welcomes these commitments and regards them as essential to ensuring that the policy does not unnecessarily restrict freedom of expression or legitimate political debate. However, explanatory notes do not form part of the disciplinary framework and may not be available to, or relied upon by, future decision-makers. If the University intends these safeguards to govern the operation of the policy, they should appear in the policy itself rather than solely in the explanatory materials.

University policies should clearly distinguish between racism directed at people and criticism of states, governments, institutions, political movements, ideologies or public policies. Staff and students must be able to participate in robust academic and political debate without uncertainty as to whether disagreement with a political position may later be characterised as misconduct.

UMSU therefore proposes the same wording for s.4.19 as we have proposed for s.4.6(a) of the *Student Conduct Policy*:

*In determining whether conduct constitutes Racism, regard may be had, where relevant, to the definitions of Antisemitism, Islamophobia, and Racism towards Aboriginal and Torres Strait Islander peoples. However, these definitions are interpretive aids only and do not create separate categories of misconduct or determine whether conduct constitutes Racism. Criticism of the policies, actions, or conduct of any state, government, institution, or political movement does not, of itself, constitute Racism.*

The antisemitism definition raises a separate drafting issue. It refers to the Universities Australia definition “as described in the working definition” and then reproduces part of that text. This makes it unclear whether the reproduced text or the full external definition is intended to apply. The date is also incorrect - Universities Australia agreed the definition on 24 February 2025 and published it on 27 February 2025.

## Recommendation 5

UMSU recommends that s.4.19 incorporate the commitments contained in the explanatory note in the terms proposed above. The full Universities Australia definition of antisemitism should be reproduced in a schedule, the partial extract removed from the definition, and the publication date corrected to 27 February 2025.



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### 3.3. The exemption (s.4.19(a))

UMSU supports the exemption in s.4.19(a). We note its wording appears to be derived from s.11 of the *Racial and Religious Tolerance Act 2001* (Vic), which protected conduct engaged in reasonably and in good faith in the course of genuine academic, artistic, religious, scientific or public-interest activity.

However, the drafting in the proposed clause differs from the legislation. The comma following "made or held" is a semicolon in the draft policy. This separates statements, publications, discussions and debates from the purpose requirement, creating uncertainty as to whether those activities are protected only where undertaken for a genuine academic, artistic, religious, scientific or public-interest purpose - or whether they are protected in all cases.

There are also legislative accuracy issues. The *Racial and Religious Tolerance Act* was repealed on 15 April 2026 when civil vilification protections were transferred to the *Equal Opportunity Act 2010* (Vic). Although the explanatory note refers to the *Equal Opportunity Act*, the exemption, Authority section and definition of vilification have not been accordingly updated.

More fundamentally, the exemption in the draft appears intended to apply only to s.4.18(b). This will have the effect of the same expression being characterised as discrimination, harassment, vilification, or a failure to comply with general behavioural provisions elsewhere in the policy. Consequently the protection doesn't provide meaningful certainty for staff engaged in teaching, research, publication, advocacy or public debate.

This is particularly significant in the context of contentious political issues. University staff should not be exposed to disciplinary action merely because a complaint has been made about lawful scholarly, educational or political expression. Where allegations arise from expressive conduct, decision-makers should be required to consider freedom of expression, academic freedom and applicable exemptions before any finding can be made.

The policy should therefore expressly cross-reference the *Academic Freedom of Expression Policy* (MPF1224) and the *Freedom of Speech Policy* (MPF1342), both of which are already recognised in s.4.4.

#### **Recommendation 6**

UMSU recommends that s.4.19(a) be redrafted to follow the structure of the corresponding exemption in the *Equal Opportunity Act 2010* (Vic), so that the purpose requirement clearly applies to statements, publications, discussions and debates. The exemption should apply to every provision of the policy that regulates expression. The policy should cross-reference university policies MPF1224 and MPF1342 and provide that, where an allegation arises from expressive conduct, teaching, research, publication, protest, advocacy or participation in public debate, the decision-maker must first be satisfied that the exemption does not apply before any finding of misconduct can be made.

### 3.4. The definition of Racism (s.7)

The current policy prohibits "acts of racism, including but not limited to "racial discrimination, racial harassment, racial vilification and offensive behaviour because of race, colour or national or ethnic origin". The draft replaces that non-exhaustive approach with a closed definition that also extends to religion.



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UMSU does not oppose protection from religion-based hostility. Indeed, inclusion of religion addresses a gap identified by UMSU in the *Student Conduct Policy*, where Islamophobic conduct may fall outside a definition confined to race, colour or ethnic origin.

However, extending the definition of racism to religion expands the scope of conduct regulated by the policy and consequently cannot accurately be characterised as a mere clarification of existing provisions. If the University intends to make that change, it should identify and explain it expressly.

Further concerns arise from the drafting:

- the explanatory note states that the amendments do not create a new category of prohibited conduct, yet extending the definition to religion broadens the conduct captured by the policy;
- "offensive behaviour" is defined only in relation to race, colour and national or ethnic origin, leaving its application to religion unclear;
- an offence-based standard may be inappropriate when applied to religious belief, doctrine or practice, which may legitimately be examined, criticised or debated in teaching and research;
- the conjunctive "and" in "discrimination, harassment, vilification and offensive behaviour" may be interpreted as requiring all four elements; and
- "ethic" appears to be a drafting error and should read "ethnic".

### **Recommendation 7**

UMSU recommends that the University determine whether religion-based hostility is to be treated as racism under both policies and make that choice express. If religion is to be included, the definition of offensive behaviour should be extended and drafted with a threshold appropriate to discussion of religious belief and practice. The definition of Racism should use "or" in place of "and", and "ethic" should be corrected to "ethnic".

### **3.5. The Islamophobia and Aboriginal and Torres Strait Islander definitions**

The definition of Islamophobia refers to the "radicalised treatment of Muslims" which appears to be a drafting error. Obviously, "radicalised" has a distinct meaning and, in this context, risks reinforcing the very stereotype the definition is intended to address by associating Muslims with radicalisation. We understand this was a typographical error – but urge the University to take better care of the drafts released to stakeholders.

UMSU's comments in our submission on the *Student Conduct Policy* concerning the descriptive language used in the Islamophobia definition, including the undefined concept of "perceived Muslimness", also apply to this draft. Definitions that may inform disciplinary decision-making should be expressed in clear and accessible terms so that their scope can be readily understood by staff, students and decision-makers.



The proposed definition of racism towards Aboriginal and Torres Strait Islander peoples raises different concerns. UMSU supports recognising the distinct forms of racism experienced by First Peoples and acknowledges the work undertaken by the Group of Eight working group in developing the draft definition. However, the explanatory note describes the definition as a draft, and its current form appears directed more towards explaining the nature and effects of racism than defining conduct for the purposes of a disciplinary policy.

Moreover, the definition is written in the first person, refers to historical and systemic processes, and states that racism may be conscious or unconscious. Those propositions may be accurate and useful as explanatory context, however they fail to clearly identify the conduct that is prohibited under the policy or assist decision-makers in determining whether particular conduct amounts to racism in an individual case.

If the University intends the definition to operate as part of a disciplinary framework, the explanatory and educational content should be distinguished from the conduct standard itself. Staff and students should be able to identify with reasonable certainty what conduct is prohibited, while explanatory material can continue to provide context regarding the historical and systemic dimensions of racism experienced by Aboriginal and Torres Strait Islander peoples.

### **Recommendation 8**

UMSU recommends correcting “radicalised” to “racialised” in the definition of Islamophobia. UMSU further recommends that the definition of racism towards Aboriginal and Torres Strait Islander peoples be revised to distinguish explanatory content from the conduct standard and be finalised only after consultation with Aboriginal and Torres Strait Islander staff and students across both policy processes

## **4. Other matters**

### **4.1. Students who are also employees or other workers (s.2.1)**

Many students undertake work for the University as tutors, demonstrators, research assistants and casual staff. The definition of “other worker” also extends to volunteers and students undertaking work experience. As a result, a significant cohort of students is subject to both this policy and the *Student Conduct Policy*.

Section 2.5 of the *Student Conduct Policy* draft expressly recognises that students who are employees or other workers must also comply with this policy. However, neither policy explains how matters will be managed where the same conduct engages both frameworks.

This creates uncertainty for students and decision-makers alike. A student should not be exposed to multiple investigations, parallel disciplinary processes or separate sanctions arising from the same incident. Nor should there be uncertainty about which framework takes precedence where conduct occurs in a setting that involves both employment and student responsibilities.

The University should provide a clear mechanism for determining which policy applies, based on the capacity in which the individual was acting at the relevant time. It should also make clear that a single incident will ordinarily be addressed through a single process.



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## **Recommendation 9**

UMSU recommends that both policies include reciprocal provisions specifying which policy applies where a student is also an employee or other worker, having regard to the capacity in which the person was acting at the time of the conduct, and that a single incident will be addressed through one disciplinary process.

### **4.2. Students who report conduct by staff (s.5.18(j))**

Students may make disclosures and formal reports regarding staff conduct under s.5.2. Where an investigation is undertaken, s.5.18(j) provides that the discloser will receive the findings and, “where appropriate”, any relevant outcomes.

UMSU welcomes recognition that some feedback should be provided to disclosers. However, the policy provides no guidance as to when disclosure of outcomes will be considered “appropriate”. This lack of clarity may leave students uncertain as to whether their concerns have been addressed and may discourage reporting. Our casework suggests this is frequently the case.

The issue is particularly important where the student continues to interact with the staff member concerned. A student who reports racism by a tutor, lecturer, supervisor or other staff member may remain in a teaching, assessment or supervisory relationship with that person for an extended period. In those circumstances, the student has a legitimate interest in understanding whether the University has taken steps to address the conduct and to protect their safety and wellbeing.

The policy should therefore provide more specific guidance about outcome disclosure and the information that will be provided to students whose ongoing participation in university activities may be affected by the conduct complained of.

## **Recommendation 10**

UMSU recommends that the policy specify the circumstances in which outcomes will be disclosed to a discloser and, where the discloser remains in a teaching, assessment or supervisory relationship with the respondent, require the University to inform the student of any measures taken to protect their safety, wellbeing or educational participation.

### **4.3. Transitional provision**

The draft introduces a number of substantive changes, including the revised ‘University Values’ and the expanded definition of Racism. As a matter of basic fairness and certainty, the policy should state that conduct is assessed against the version of the policy that was in force when the conduct occurred.

Without a transitional provision, uncertainty may arise as to whether amended standards can be applied to conduct that pre-dated their introduction.

## **Recommendation 11**

UMSU recommends including a transitional provision stating that conduct must be assessed against the version of the policy in force at the time the conduct occurred.



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## 5. Conclusion

UMSU supports the University's objective of strengthening its response to racism and fostering a safe and inclusive workplace. However, the draft contains substantive changes that are not fully disclosed in the consultation materials, adopts definitions and exemptions that differ from the corresponding *Student Conduct Policy* reforms, and creates unnecessary uncertainty regarding the relationship between the racism provisions, academic freedom and freedom of expression.

For the reasons set out above, UMSU recommends that the draft be revised in accordance with the recommendations in this submission, aligned with the *Student Conduct Policy*, and reissued for consultation with a tracked-changes comparison. Given the significance of the proposed amendments, stakeholders should have a clear opportunity to consider the complete effect of the revised policy before it is approved.



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## Attachment 1: drafting and cross-reference errors

The errors below are in addition to those raised in the body of the submission.

| Section                             | Error                                                                   | Correction                             |
|-------------------------------------|-------------------------------------------------------------------------|----------------------------------------|
| 1.1(b), (c)                         | (b) ends with a full stop and “and” follows (a); (c) has no full stop   | Fix list punctuation                   |
| 3.1(o)                              | <i>Racial and Religious Tolerance Act 2001</i> (Vic) repealed           | Replace with current legislation       |
| 4.9                                 | “Failure to comply with section 4.5”                                    | 4.7                                    |
| Personal and professional behaviour | Paragraph unnumbered; (g) ends with a semicolon                         | Number the paragraph - fix punctuation |
| 4.10(e)                             | Lettering duplicated (“e e”)                                            | Delete the duplicate                   |
| 4.11                                | Training and conflicts of interest merged into one clause               | Separate clauses                       |
| 4.18                                | “the actions in (c)-(l) are defined”                                    | (b)-(l)                                |
| 4.18(l)                             | Refers to section 4.9                                                   | 4.10                                   |
| 4.19                                | First limb unlettered; second lettered (a)                              | Letter as (a) and (b)                  |
| 4.19(a)                             | Semicolon breaks up the statutory structure                             | Redraft (see section 4.3)              |
| 5.6                                 | “and” after (c); no full stop after (e)                                 | Fix list punctuation                   |
| 5.7                                 | “as dealt with in section 5.5 above”                                    | 5.6                                    |
| 5.16(b)                             | “complaint manager”                                                     | “case manager”                         |
| 7 (antisemitism)                    | Stray closing quotation mark; date 2026                                 | Delete; 27 February 2025               |
| 7 (protected attribute)             | “and” after (p); no semicolon after (q)                                 | Fix list punctuation                   |
| 7 (child abuse)                     | Sub-paragraphs lettered (s) to (v)                                      | (a) to (d)                             |
| 7 (corrupt conduct)                 | First sub-paragraph has no letter                                       | Letter it (a) and re-letter            |
| 7 (gender-based violence)           | Stray quotation mark                                                    | Delete                                 |
| 7 (several definitions)             | MPF1359 cited as the “Sexual Misconduct Prevention and Response Policy” | Use the current title                  |
| 7 (Islamophobia)                    | “radicalised”                                                           | “racialised”                           |
| 7 (Racism)                          | “ethic”                                                                 | “ethnic”                               |
| 7 (vilification)                    | Attributes narrower than the <i>Equal Opportunity Act 2010</i> (Vic)    | Update                                 |