

6 August 2025

To the Honourable Justice John Sackar AM KC ('Reviewer')

By email only: PRLIndependentReviewSecretariat@dcj.nsw.gov.au

Review of criminal law protections against the incitement of hatred

Dear Reviewer,

The Inner City Legal Centre (ICLC) is a community legal centre originally founded in 1980 to serve those most at need in Sydney's inner city and inner east areas. In addition to catchment-based services, we also have a number of specialist legal services that are available statewide, including NSW's only 'Sex Worker Legal Service' (SWLS) and only Trans and Gender Diverse Legal Service (TGDLS).

The SWLS and TGDLS clinics are often fully booked as the demand for their services is far greater than the resources available to the ICLC. Our solicitors and staff are highly experienced in serving the sex worker community and trans and gender diverse community. Our work is informed by direct experience of the harms caused by hate speech, vilification, and incitement to violence.

Due to a chronic lack of funding and resourcing the ICLC is only able to provide a very brief submission to this review of criminal law protections against the incitement of hatred for vulnerable groups.

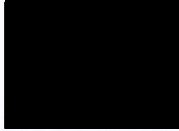
ICLC did not support the introduction of section 93ZAA into the *Crimes Act 1900* for the same reasons that the NSW Law Reform Commission Report dated September 2024 did not recommend a new provision related to section 93Z of the *Crimes Act 1900*.

If section 93ZAA is included then we submit it must include all minorities and protected groups, and must not be restricted on the basis of race only. Other protected persons and classes of people, such as people living with a disability, LGBTQIA+, gender expression and those employed as sex workers must be included.

Introducing additional criminal provisions in a reactionary way does not solve the issues of hate crime and hate in the community. ICLC submits that it would be more cost effective for the government to invest in awareness campaigns and Community Education, such as those

provided by Community Legal Centres, and improving funding and access available to support vulnerable communities to access the civil vilification pathways available through Anti-Discrimination legislation.

Sincerely,



Karen Beashel
Principal Solicitor
INNER CITY LEGAL CENTRE