



*All about the girl*

8 February 2024

**Lowther Hall Anglican Grammar School's** submission to the Productivity Commission's Draft Report - *Future Foundations for Giving*

## Introduction

The Productivity Commission's draft report into Philanthropy – Future Foundations for Giving – has provided a range of recommendations in relation to philanthropic giving in Australia and Lowther Hall welcomes the opportunity to provide feedback.

This submission will focus on the recommendation to remove DGR status for school building funds on the basis that there is “the potential for a donor to be able to convert a tax-deductible donation into a private benefit.”

We are extremely concerned that the Productivity Commission in its interim report has recommended the removal of Deductible Gift Recipient (DGR) status for School Building Funds and we believe that this action would have a significant negative impact on our community and thousands of others around Australia, and urge the Commission to reconsider.

Lowther Hall Anglican Grammar School is located in Essendon in metropolitan Melbourne and currently enrolls 900 students and employs 188 teachers and other staff. The School contributes to the social and economic life of the community in which it is situated in many ways. This includes active student participation and support of social enterprises such as for the Asylum Seeker Resource Centre; annual Toy Drive each December, national and international fundraising causes and in local Moonee Valley City Council ANZAC commemorations. The School's high quality performing arts productions – musicals and plays – and Art and Design Exhibitions held annually are open to the wider public to attend and enjoy. In November last year Lowther Hall held a Twilight Festival providing fun and festivities and evening fireworks for the wider community to join in too in the grounds and facilities of the school. Economically, Lowther Hall engages with local small businesses and contractors routinely and more so during works programs. The School hires facilities at discount rates to community groups and associations such as the Victorian Fencing Academy on Saturday afternoons, for Robotics Workshops, local tennis coaching programs after hours, Code Camp and so forth. ABODA (Australian Band and Orchestra Directors' Association) holds the Victoria Summer Conducting School each January and in 2024, Lowther Hall will be hosting the Steplab Victoria Professional Learning Conference for teachers across Australia at Lowther Hall. Additionally, the School has been hired for occasional weekend PlaySchool Live performances.

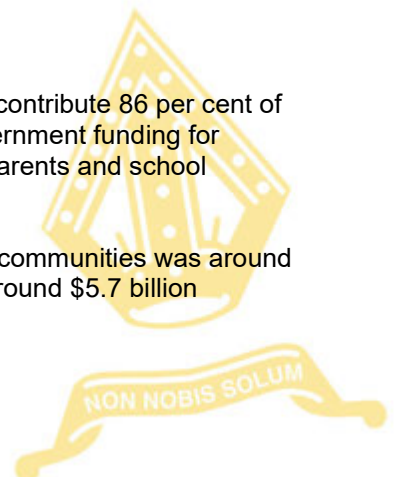
## Schools as not for profit entities

Like the majority of non-government schools in Australia, Lowther Hall Anglican Grammar School is a not-for-profit entity, registered with the Australian Charities and Not-for-Profits Commission (ACNC) with the charitable purpose of 'advancing education'. This recognition of the importance and public benefit of the work of schools in educating Australia's young people underpins the DGR status of the school building fund at our school and others around Australia.

## The importance of building funds for schools

Across Australia, Independent school families, alumni and communities collectively contribute 86 per cent of school capital income nationally. Two-thirds of Independent schools receive no government funding for capital expenditure. In many schools, capital funding is 100 per cent sourced from parents and school communities.

In 2021, the value of this contribution from Independent school families, alumni and communities was around \$1.14 billion for school building and capital works. These same families contribute around \$5.7 billion annually to the ongoing costs of educating their children, with their after-tax dollars.



In 2023 the value of parents and community donations to capital works at Lowther Hall was \$257,000 and went towards the development of much-needed school infrastructure. For example, \$80,000 of this funding was used for a solar panel project, currently being installed on the roof of the auditorium. These panels will then contribute to savings for future provision of air conditioning for the auditorium, where much of the community engagement occurs. The bulk of the funds were allocated to the construction of a new upgraded playground and necessary, associated civil works for its safe establishment.

Any building work at Lowther Hall Anglican Grammar School is for the use of future, as well as current, students and is also often utilised by the broader community, as per previous examples given.

### **Private Benefit**

The Productivity Commission has argued in its report that in the case of school building funds, there is “the potential for a donor to be able to convert a tax-deductible donation into a private benefit is especially apparent for primary and secondary education, particularly where students are charged fees.”

However, the Productivity Commission has shown no real evidence to support its argument that there is a material risk of tax-deductible donations to school building funds being converted into a private benefit. School Building Funds support capital works programs and develop assets with a life that extends far beyond the 12 years a child spends at school. Further, it is not only the families of current students that contribute to school building funds, but alumni, community groups, and others through a range of fundraising activities. It is extremely unlikely that a member of the community, or a school alumnus – who may have left the school many years ago – could benefit directly from these donations.

And while the draft report raised the possibility of there being a link between donations and fees charged for education services, this is not the case in schools. Capital works are funded separately to the recurrent operating costs that are recouped through fees, and deductible donations to a School Building Fund therefore do not materially reduce the fees payable by parents.

### **Impact of the removal of DGR status for school building funds**

Removing DGR status for non-government school building funds will shift more financial burden onto families, who already make significant sacrifices to support their children’s education and are doing their best to manage the ever-increasing cost of living pressures.

For Lowther Hall Anglican Grammar School the removal of DGR status for school building funds will directly impact the capacity of the school to provide the best possible learning environment for our students. This will include future building projects such as the redevelopment of quite aged infrastructure and pedagogically ill designed facilities for the current era and for accommodating the growing student and staff numbers.

### **Conclusion**

Lowther Hall does not support the Productivity Commission’s recommendation to withdraw DGR status from school building funds and is concerned about the very detrimental impact it could have on the provision of quality education nationally.

On behalf of our students, families and the wider school community we ask that the Commission reconsider this recommendation.

Thank you for your consideration of this submission.

### **Elisabeth Rhodes**

Principal

Lowther Hall Anglican Grammar School  
8 February 2024

