
February 8th, 2024

Christian Venues Association (CVA) is a national association and one of the leading Christian peak bodies in Australia. We represent and advocate for more than 150 member organisations across federal, state and territory governments. All of our members are Christian faith-based organisations and as part of their membership they rely on CVA to provide dialogue and advocacy to the government on areas that impact their sector.

Our members specialise in accommodating and catering for large groups of people in environments that support mental health and wellbeing. They provide both facilities and services to schools, churches, charities and community groups for the purposes of outdoor education, recreation, sporting and cultural experiences. The impact of these services is substantial both in terms of the number of people they engage with, as well as the economic impact this represents.

As an association, we have concerns about the recommendations contained within the Productivity Commission's November draft report. Significantly, a proposed reform withdrawing DGR status from charities supporting school building funds would indirectly impact our membership in potentially significant ways.

Independent Christian schools provide a significant number of participants to our camps and venues throughout the year. If schools are required to redistribute non-deductible funds to support building funds and facility maintenance this will impede their ability to provide students with the services our member organisations provide.

Whilst we respect the Commission's attempt to rectify inefficiencies within the DGR system, the demonstrably positive net benefit that Independent Christian schools provide the Australian public means a reform that effectively immobilises their ability to raise funds for building projects will inhibit their ability to serve their community effectively. It will also have the indirect effect of cutting off funding that flows to other community benefitting organisations as non-deductible money is redistributed to building funds.

The rationale employed by the Commission—that limiting tax-deductibility in this way will only impact donations securing a private benefit—fails to acknowledge the multitude of ways private school facilities serve their local communities. For CVA, utilisation of halls and recreational centres is pivotal in allowing us to provide services to the community, and

reducing the capacity of schools to build and maintain these facilities will have a long-term impact on our member operations.

We are asking that the Commission revise its draft before submission, to remove the recommendation to withdraw DGR status to school building funds.

Many Christian organisations in Australia work in collaboration with each other in order to provide significant community wide benefits. Reform in one area must therefore be done with consideration to the indirect impact it will have on connected organisations.

Graeme Janes
Chief Executive Officer