

I want to commend the Govt and the productivity commission on their work to make the Charity sector more fit for purpose, transparent and navigable for donors and charities alike. This is a huge, thankless task and I thank all those involved.

Limitation

I want to limit my response to the area of Religious Education/Instruction as this is the area I have the most experience and expertise in having served on the Qld Dept of Educations Religious Instruction Quality Assurance Board for a number of years, and as the Chair of the Qld Christian Religious Instruction Network in the past. I have 20 years experience teaching Religious Instruction in both NSW and Qld.

An observation

I note from the disclosure statements of the Commissioners, that none of them disclosed any connection with a religious institution or faith. I find this an interesting situation given the report's own highlighting of religion or faith, as one of the highest motivations for people giving both financially and voluntarily, and that religious organisations are at the top of organisations that receive donations, DGR or not.

Given the importance of Religion in the Charitable area, I would have thought it would have been an important consideration to have at least one member of the panel with firsthand, lived religious experience to be able to speak to this area – not as an advocate – in a disinterested fashion. It seems a huge oversight.

Perhaps this oversight speaks to the report's downplaying and dismissing of charitable giving for religious purposes. The report does not seem to make an argument for this position (I can't find one), but rather just assumes this position as the default. Ie the prevailing zeitgeist that religion is old hat and, on the way out. As Australia grows more pluralist and multicultural, a mature, considered approach to religion, and related giving, seems to be needed, rather than a stale secularism. We need to be fostering healthy approaches to faith in Australia, and multi-faith understanding, and seeking for ways to grown and empower this, rather than marginalising faith and religious people – which, by the responses so far, this report has done.

Religious Education/Instruction

I can understand the DGR status for organisations mainly involved in advancing religion has not been broadly applied for a long time in Australia. Ie Churches, Synagogues, Mosques and Temples for their own operations cannot current gain DGR status. As the report notes, this is a reality in some jurisdictions, but is not on the Australian appetite.

Meanwhile the report finds

- giving for religious reasons, both financially and in volunteer time is among the highest of all categories.
- “specific volunteering activities, such as **volunteering for religious**, education and coaching organisations, provide wider public benefits that might warrant government support.”
- “charities that focus on prevention face barriers to eligibility” – with Religion a strong preventative factor towards distress and poverty

So it seems odd that one of the few areas where the DGR status of religious bodies can be affirmed and supported for all the good they do, volunteering they promote, and harms they prevent – religious education – is disposed of.

As I said above – I can understand that giving *within* a religious institution fails the Private Benefit test. Those giving to their own Church or Temple are the ones that derive much of the services provided. But I believe a strong case can be made to retain, and perhaps clearly define, that giving to religious education, that happens outside a faith institution, ie in the state school system, is of great public benefit to a much wider group of people, encouraging volunteering in schools, community, healthy religious engagement, harm prevention, civics, service, tolerance and cultural understanding.

Numerous people are employed across Australia to teach Religious Instruction/Education with most of the funds derived from giving, and my understanding is that Religious Instruction is the second largest group of volunteers across Australia, after surf lifesaving, so to remove their access to funding seems a very strange way to encourage such volunteer work.

Wider Context

I also note with some irony that Scripture Union lost their DGR status for the provision of the hugely popular and highly regarded School Chaplain programs in the last financial year. This decision went largely unnoticed as Scripture Union seek to work cooperatively with Government to restore such a status.

My understanding is that the reason given for Scripture Union's loss of DGR status for school Chaplaincy, was that the program was deemed to not fall under their Charitable status 'advancing religion' as the Chaplaincy program is very limited in its ability to advance religion.

This is true, School Chaplains, quite rightly, can only respond to enquiries about faith in their day to day operations as they provide pastoral care, support, and other programs in schools – self-esteem, breakfast, etc, etc. School Chaplaincy is known to multiply the Government's investment through communities who often doubled a chaplain's time through donations, and who brought volunteers into the schools to run things like breakfast programs, enhancing the whole school offering, so removing Chaplain DGR status seemed like a retro guard move.

Now it seems like double jeopardy that the same government is considering removing religious organisations - like Scripture Union's - 'advancing religion' DGR status.

The situation described above can create cynicism that this isn't simply an innocent mistake, an ill-considered overreach, or collateral damage of cleaning up a system, but driven by an ideological agenda.

I'm all for making religious organisations have the same reporting requirements as other organisations as outlined in the report. I'm disappointed that religious groups seems to suffer the consequences of a blanket assumption against religion's positive role in society, where the argument for this isn't made, on the contrary the opposite argument is given in the report.

In Conclusion

- Thank you for your time and work, for seeking a more fit for purpose, transparent and equitable system.
- Thank you for welcoming submissions.
- Thank you for acknowledging the huge impact of faith in the charitable sector.

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- I endorse the need for Religious organisations to not have blanket exemptions for their reporting.
- I'm disappointed that DGR status for religious endeavours is assumed no longer relevant, without the argument even being made.
- Please do not remove the small amount of status around donations the religious sector retains in this area, especially for areas where the private benefit risk is extremely small – ie Religious Instruction/education – and the Public benefit is huge.
- Your continued endorsement of DGR status for Religious Instruction [at the very least] would give faith groups and communities a status boost in a world where they are increasingly feeling marginalised, especially by the left of politics.

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