



Emmanuel College 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 Emmanuel College 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.

Emmanuel College is located at Carrara, Gold Coast and currently enrolls more than 1800 students and employs over 300 teachers and other staff. The school contributes to the social and economic life of the community in which it is situated.

Schools as not -for profit entities

Like the majority of non-government schools in Australia, Emmanuel College 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.



Any building work at Emmanuel College is for the use of future, as well as current, students and is also often utilised by the broader community. Our community facilities provide direct benefits to almost 4000 people within the immediate catchment. Our indoor and outdoor sporting facilities and Performing Arts Theatre are enjoyed by many thousands of Southeast Queenslanders.

In 2023, tax deductible parent donations contributed \$250,000 towards a new building for Josiah College (an Emmanuel College subsidiary school) a special school educating students with autism spectrum disorder.

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 Emmanuel College 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 an expanded



kindergarten and childcare facility, additional Senior School classrooms, and redeveloped major sporting centre, to name but a few.

Conclusion

Emmanuel College 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.

Dan Brown

Principal

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