To whom it may concern,

We write to raise concerns around the possible removal of the deductible gift recipient (DGR) status for religious education. As a charitable organisation we provide Special Religious Education (SRE) in NSW government schools so the loss of our DGR status would adversely impact the service we provide to students and families in school communities.

We were pleased to read the Productivity Commission recommended adjusting the criteria charitable groups needed to meet to be eligible for DGR status, allowing the inclusion of between 10,000 and 20,000 additional charities. We were also disappointed to learn the Commission is considering removing the DGR status of charities which provide religious education in government schools.

Importantly, the Commission’s draft proposal noted some of the charities that would be able to be included are those supporting *“the goals and ambitions of Aboriginal and Torres Strait Islander communities”* (p.8). Additionally, the draft proposal indicated additional actions the Australian Government should take to encourage philanthropic links with charitable organisations *“that are led by or support”* First Nations peoples (p.8). This should indeed be a goal of any future guidelines around the provision of DGR status to organisations. However, First Nations peoples have close connections to Country and, consequently, The Dreaming. It is inherent to their understanding of themselves and their culture. As this is a religious belief system, the guidelines being proposed would, it seems, exclude many of the organisations supporting the culture and needs of First Nations peoples the Commission’s draft proposal claims it wishes to better support.

The Commission’s draft proposal highlighted the significant contribution made to Australian society by faith communities (p.18). However, the proposed decision to remove DGR status from religious education providers seems to contradict this acknowledgement. It seems religious groups are being discriminated against despite the enormous contribution [research](https://www.hoover.org/research/religious-faith-and-charitable-giving) has found they make to Australian communities in areas such as prisoner rehabilitation, support for isolated communities and combatting sex trafficked children.

SRE provides opportunities for schools to be better linked to their communities. The draft proposal stated, *“where sporting activities further another charitable purpose, such as advancing health, they may be eligible for support through the DGR system, as is currently the case”* (p.19). Why then would organisations, such as ours, providing religious education be excluded? Research conducted by Gross & Rutland ([2023](https://www.tandfonline.com/doi/full/10.1080/15507394.2023.2185054#:~:text=These%20responses%20reinforced%20the%20findings,bullying%20and%20vilification%20in%20schools.)) evidenced the benefits of religious education.

They found:-

1. SRE provides values education which stresses family and community, offering an alternative to the individualism present in society today.
2. SRE provides opportunities for religious identity to be reinforced which is particularly important for minority religions.
3. Educational experts place health and wellbeing high on their agendas. It has long been acknowledged spirituality is an important aspect of identity and the inclusion of SRE in schools allows for a sense of belonging to be encouraged as students gain a greater understanding of their own identity.
4. Religious education provides opportunities for understanding of other cultures and their practices and beliefs to be incorporated into the school community. This also promotes acceptance of multiculturalism, fostering positive attitudes towards others and their beliefs. This minimises opportunities for religious extremism to cultivate.
5. One quarter of Australian society reports having been subjected to discrimination due to their religious beliefs. SRE was found to provide opportunities for students to develop strategies that help them respond to negativity they experience due to their beliefs. This is particularly important as Australian society becomes increasingly diverse. It has been clearly demonstrated in the media negative attitudes towards Jews, Christians and Muslims are all too common.

Given the benefits SRE is found to provide it seems that, like sporting organisations, religious education provides a range of important benefits, not least of which is improving mental health and wellbeing. As you are no doubt aware, this is critical in light of the [current rates](https://psychology.org.au/about-us/news-and-media/media-releases/2022/children-18-months-to-18-years-showing-serious-men) of depression, anxiety, self-harm, suicide and poor peer relationships.

The philanthropic goals of the Productivity Commission’s draft report state they aim to increase the number of volunteers and double the amount of giving by 2030. The contributions made by 12,000 year-round volunteer SRE teachers and those employed by local churches to support local school communities is being trivialised. Their commitment and preparation are being undervalued. The Department of Education acknowledges SRE teachers make up the largest group of volunteers in schools. It seems the decision to remove the charitable giving status of organisations providing religious education would be counterproductive to the intended goal. Moreover, it is hostile towards those who hold religious beliefs.

There are a variety of charities that some, across society, would argue should not have charitable status but, Australia is a democracy and a signatory of the Universal Declaration of Human Rights. A truly secular society supports and values the contributions of all individuals and groups. Removing the charitable status of organisations like ours violates these objectives and hinders the evolution of a genuinely democratic Australia.