

## Australian Law Reform Commission Consultation Paper: Religious Education Institutions and Anti-discrimination Laws

### **Critique of the scientific deficiencies in the ALRC's justification of 'Necessity' for Proposition A**

The ALRC Report acknowledges that core human rights are being interfered with by the Australian Government's proposed restriction of "the right to manifest religious belief in community with others, parents' liberty in relation to their children's religious and moral education, and freedoms of expression and association." (49)

The ALRC Report notes that the Government is bound by international law to "not unduly interfere with or limit human rights" and the Report poses the central question, "whether the interference is justifiable".

The Report then proceeds to argue that this proposed interference with core human rights is justifiable, since it meets the tests of Necessity and Proportionality.

I will demonstrate how weak the ALRC argument for Necessity is regarding Proposition A (sections 49, A.33, A.36). Because of my area of expertise as a medical practitioner, I will focus on the ALRC's arguments that rely on clinical science.

My conclusion is that the scanty clinical science referenced cannot be used to justify the assertion of Necessity. In particular, the repeated assertion that LGBTQI+ students will suffer 'significant mental health harms' compared to non-LGBTQI+ students without a change to the law governing religious education institutions, is not justified by the evidence. Nor is any connection demonstrated between religious education and the experience of discrimination by transgender individuals.

Such poorly founded assertions are frequently made by advocates for LGBTQI+ causes but should not be made by an impartial legal commission.

I take the time to demonstrate the insecurity of the ALRC's claim in order that such unreliable assertions might be removed from further drafts of this Report, that the lack of Necessity for Proposition A be acknowledged, and the Proposition be withdrawn.

At the end, I make a comment on behalf of my wife and myself as 'stakeholders' whose sons attended Catholic primary and tertiary education institutions, to help the ALRC understand the gravity and disproportionality of this proposed assault on "the right to manifest religious belief in community with others, parents' liberty in relation to their children's religious and moral education, and freedoms of expression and association."

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## The quasi-scientific justification of Proposition A as ‘Necessary’

Appendix A.33 cites the clinical references used by the ALRC to justify Proposition A as Necessary

### **Necessary to achieve a legitimate aim**

A.33 Such reforms are necessary to achieve this aim:

- in light of the particular vulnerability of students with the protected attributes to significant mental health harms from exclusion and discrimination. For example, an Australian study published in 2021 reported that ‘one in four LGBTQ+ young people have attempted suicide and one in two trans young people’.<sup>148</sup> There is evidence that this vulnerability can be compounded for students who are themselves religious.<sup>149</sup> Australia’s largest national study into the experiences of transgender students found that a large proportion (68.9%) reported experiencing discrimination, which is a key driver of mental health concerns, including depression, anxiety, post-traumatic stress disorder, eating disorders, self-harm and suicidal ideation.<sup>150</sup> The study found that factors associated with schooling were major drivers of mental health problems for transgender students.<sup>151</sup>

148 Adam O’Hare et al., *Writing Themselves In 4: The Health and Wellbeing of LGBTQA+ Young People in Australia* (Australian Research Centre in Sex, Health and Society, La Trobe University, 2021) 16. See also, Penelope Strauss et al., *Trans Pathways: The Mental Health Experiences and Care Pathways of Trans Young People – Summary of Results* (The Ethnon Kinds Institute, 2017) 34; Douglas Ezzy et al., ‘LGBTQ+ Non-Discrimination and Religious Freedom in the Context of Government Funded Faith Based Education, Social Welfare, Health Care, and Aged Care’ (2022) 58(3) *Journal of Sociology* 1, 6–7.

149 See, eg, Megan C Lytle et al., ‘Association of Religiosity With Sexual Minority Suicide Ideation and Attempt’ (2018) 54(5) *American Journal of Preventative Medicine* 644, 644, who found that ‘[o]verall, increased importance of religion was associated with higher odds of recent suicide ideation for both gay/lesbian and questioning students’. The authors also highlight a link between internalised negativity toward one’s LGBTQ+ identity and religiously based stigma in non-affirming religious contexts (at 645).

150 Penelope Strauss et al. (n 148) 60.

151 *Ibid* 45, 51–5.

The ALRC’s clinical references fall well short of establishing ‘Necessity’ for Proposition A. The Report fails to validate the Government’s thesis: that religious education is a uniquely serious cause of discrimination and suffering for trans or LGBT students and must be constrained.

Proposition A should be rejected.

## Consideration of the Report's three clinical references and their deficiencies:

### [A] The headline reference on attempted suicide: a failure of context

An Australian study published in 2021 reported that 'one in four LGBTQ+ young people have attempted suicide and one in two trans young people'.

The implication of this quote from the La Trobe study is that suicidality is a unique issue for LGBTQ+ young people, with the rates for other students not even mentioned. Why this lack of context? The ALRC should consider the recent large and statistically robust report from the Centre for Disease Control (CDC) in the USA, which reveals the context of shocking rates of suicidality across young people generally.<sup>i</sup>

The CDC research challenges the narrow analysis of the ARLC in a number of areas:

#### **1. 'One in four' female students in the US had a suicide plan in 2021.**

The disproportionate burden of mental health / suicidality on LGBTQ+ students is also observed with female students. Where the La Trobe study cited by the ALRC found 'one in four LGBTQ+ young people have attempted suicide', the CDC research found, for example, that one in four female students had made a suicide plan in 2021 alone.

Across almost all measures of substance use, experiences of violence, mental health, and suicidal thoughts and behaviors, female students are faring more poorly than male students. These differences, and the rates at which female students are reporting such negative experiences, are stark.

In 2021, almost 60% of female students experienced persistent feelings of sadness or hopelessness during the past year and nearly 25% made a suicide plan.

Close to 70% of LGBTQ+ students experienced persistent feelings of sadness or hopelessness during the past year ... Almost 25% attempted suicide during the past year.

#### **2. The worsening trend in mental health problems and suicidality is across the whole US high school student population, not only LGBTQ+ students:**

In 2021, 22% of high school students seriously considered attempting suicide during the past year. Female students were more likely than male students to seriously consider attempting suicide ... LGBTQ+ students and students who had any same-sex partners were more likely than their peers to seriously consider attempting suicide ... Black students were more likely than Asian, Hispanic, and White students to attempt suicide.

The percentage of students across every racial and ethnic group who felt persistently sad or hopeless increased ... These data make it clear that young people in the U.S. are collectively experiencing a level of distress that calls on us to act.

### **3. We cannot assume that the suicide rate is higher in LGBTQ+ students than others**

Yes, there is a greater prevalence of attempted suicide in LGBTQ+ students in this US survey than in female students or other students ('10% of female students and more than 20% of LGBTQ+ students attempted suicide'), but that finding comes with a caution.

We cannot assume that the rate of completed suicide, not merely the rate of attempted suicide, is higher in LGBTQ+ youth than in female students or other young people. There is no necessary correlation between rates of attempted suicide and rates of actual suicide; for example, women have a higher rate of attempted suicide than men but a lower rate of completed suicide than men.

We can reliably tell which victims of suicide are male and which female; we cannot reliably tell which victims are LGBTQ+, hence the difficulty in establishing suicide rates and the caution in drawing any conclusions. As Associate Professor Rob Cover from the University of Western Australia, himself a gay man, acknowledges, 'the actual rate of GLBTIQ youth suicide and self-harm is not fully known.'<sup>ii</sup>

### **4. We cannot assume that research into LGBTQI+ suicidality is objective and non-ideological**

There is a danger for the ALRC in proposing a single study, by an influential advocacy unit within La Trobe University (involved in developing the controversial 'Safe Schools' programme, for example), without critical assessment. By way of caution, consider the remarkably transparent comments by Australian academic Tiffany Jones, who was one of the authors of La Trobe's 'Writing them in 3' (*WTI3*), the predecessor document to 'Writing them in 4', which we are considering here.

In April 2016 Jones was quoted in *The Australian*:

University of New England academic Tiffany Jones appears to have broken ranks from many colleagues in the field by highlighting the deficiencies of some advocacy-driven research studies, particularly those presenting gay, lesbian, bisexual, transgender, intersex and queer (GLBTIQ) youth as victims of homophobic bullying. It is an extraordinary admission given Professor Jones's role as a collaborator on a high-profile research project, the 2010 *Writing Themselves In 3* study, which has propagated this view and formed the basis for education policy across the country, including the Safe Schools gender and sexual diversity program.<sup>iii</sup>

I don't think Jones was breaking ranks. She was doing the professional thing as an academic and identifying the weaknesses in much LGBTQI+ research, particularly the way it is structured to elicit the desired "victim" narrative from students. Discussing *WTI3* and similar studies she writes,

The studies were often linked to GLBTIQ education networks interested in humanising the GLBTIQ student as a 'victim' of schools. Research tools frequently asked whether participants had experienced verbal and physical homophobic bullying, depression, suicidal intentions and self-harm in a way that created a kind of 'expected narrative' for the GLBTIQ student.<sup>iv</sup>

Jones writes that such a methodology: “privileged the bullied, depressed and suicidal position by repeatedly enquiring, and ultimately reporting on, this aspect of GLBTIQ life.” Jones noted further distorting factors in this highly political research:

They often offered clear policy implications for government, political and educational leadership. Their dramatic findings garnered media coverage with their detailed descriptions of violence and easy to understand statistics, and some reports from Western countries showed how the accumulation and dissemination of data on student well-being had over time assisted activists to obtain funding for GLBTIQ-specific educational interventions...<sup>v</sup>

This area of research is an ideological minefield. Why has the ALRC not undertaken greater due diligence in critically assessing the handful of clinical studies that it cites as justification for the ‘Necessity’ of Labor’s assault on religious education institutions?

**5. We have no evidence that religious education institutions have led to increased LGBTQI+ suicide in Australia, and no historic basis for believing that muzzling such institutions would reduce LGBTQI+ suicidality.**

The second implication of the headline reference provided by the ALRC is that LGBTQI+ youth suicidality is worsened by the adverse influence of religious education institutions. That justifies changing the law to muzzle the moral teaching of those institutions, since that will improve youth suicidality.

However, there is no evidence to support that conclusion. Even as academic speculation, the evidence of lack of impact on LGBTQI+ suicidality from other legislative changes argues against the assumption that a change in the law as proposed by the ALRC will reduce LGBTQI+ youth suicidality .

If we cannot assert that outcome, the ALRC has lost its most rhetorically potent argument for the Necessity of the proposed legal changes.

Professor Rob Cover, mentioned above, made that point in the context of a previous public debate on legal change affecting LGBTQI+ individuals: ‘It is important not to assume that legislative amendment leads directly by itself to a reduction in youth suicidality.’<sup>vi</sup> He observes that the rate of GLBTIQ suicide ‘has not dropped significantly despite a whole host of other legislative changes and protections, from de-criminalisation of homosexuality, to anti-vilification laws, to institutional anti-discrimination policies in schools and youth recreational organisations.’

Why then, one might ask, would the ALRC’s proposed laws to emasculate traditional sexual ethics in religious schools be the one intervention that does cause LGBTQI+ youth suicidality to drop? There are no grounds to expect it would do so, and therefore no grounds for asserting the Necessity of such legal changes.

[B] The second reference, on worse suicidality in religious LGBTQ+ students: what is the point being made here? Does the Government want to make such students less religious to make them less suicidal?

There is evidence that this vulnerability can be compounded for students who are themselves religious.

This is a puzzling line of argument by the ALRC, if it is an argument at all. The key finding from the footnoted study (149) is quoted in the Report as, “[o]verall, increased importance of religion was associated with higher odds of recent suicide ideation for both gay/lesbian and questioning students.’

The proposition is that increased importance of religion goes with increased suicidality. So, the Government’s proposed solution is what, exactly? Is a reduction of the importance of religion for such students really the policy objective of the Labor Government?

That is faintly sinister. But the ALRC has chosen to cite this curious evidential claim, and the clear policy implication is that the odds of suicide ideation can only improve with a reduction in the importance of religion for gay/lesbian and questioning students.

Spare a thought for the LGBT students whose religion is as much a part of their identity and structure of meaning as their sexuality is. Is the Government really here to help reduce the role of religion in their life?

The proposition in the second reference is plausible: a religious individual struggling with an emerging LGBT identity might experience greater internal dissonance and distress than a non-religious individual – but we have no idea of the size of that effect. It might be a minimal to suicidality compared with the overwhelming importance of factors cited later in this section, such as major depression, family dysfunction, sexual and physical abuse, social isolation.

More importantly, as a matter of principle, why would the ALRC even raise this point when its only policy outcome would be the abusive attempt by the State to reduce the importance of religion to certain students?

[C] The third reference, on transgender experiences of discrimination: there is no mention of religious education institutions as a factor in transgender discrimination.

Australia's largest national study into the experiences of transgender students found that a large proportion (68.9%) reported experiencing discrimination, which is a key driver of mental health concerns, including depression, anxiety, post-traumatic stress disorder, eating disorders, self-harm and suicidal ideation.<sup>150</sup> The study found that factors associated with schooling were major drivers of mental health problems for transgender students.<sup>151</sup>

This 'largest national study' is by Penelope Strauss et al, *Trans Pathways: The Mental Health Experiences and Care Pathways of Trans Young People. Summary of Results*. (Telethon Kids Institute, 2017) and can be viewed at [https://apo.org.au/sites/default/files/resource-files/2017-08/apo-nid116241\\_1.pdf](https://apo.org.au/sites/default/files/resource-files/2017-08/apo-nid116241_1.pdf)

### **1. There is no evidence in this reference that religious education is harming transgender students.**

The first reference given by the ALRC (150) directs us to p. 60. Here we find the 68.9% figure who reported discrimination and it supplies a range of testimony from trans individuals as to their experience of discrimination or bullying. There are no examples given here of discrimination at school; examples are given work or at a club or at the shops, but none from an educational institution, let alone a religious educational institution.

There is slightly more substance, still underwhelming, at the second ALRC reference (151), which directs us to pages 45 and 51–55 of the Strauss paper. Here the ALRC claims that 'factors associated with schooling were major drivers of mental health problems for transgender students'.

That is not a transparent reporting of the Strauss paper. Nowhere in the cited text does it say that 'factors associated with schooling were major drivers of mental health problems for transgender students'. That is an interpretation placed on the data by the ALRC Report.

On p.45 we see a long list of "potential drivers of poor mental health" as reported by trans people, and the percentage of respondents who mentioned those drivers. There is no mention anywhere of religious education institutions. The paper only mentions "Issues with schools universities and TAFE" for 78.9% of respondents. Why has the ARLC edited this category into "factors associated with schooling"?

As to schooling factors being a "major driver", that, too, is a contentious interpretation imposed on the data by the ALRC. The text gives no indication as to the 'major' or merely troublesome nature of such educational issues at school TAFE or university, especially in comparison to other listed drivers that one might consider unequivocally 'major' (for example, the 24.3% who described "sexual abuse outside the family" and the 24.8% who described "physical abuse within the family" might consider that a deeper trauma, more "major", than unspecified 'issues with school, universities and TAFE'.)

Comments on pages 50-55 regarding education issues include,

***... To try and cope with my dysphoria towards my chest and having to wear a skirt or dress every single day, I wore my blazer over the top every day regardless of the heat. This sometimes made me tired or just plain hot and bothered ...***

For one respondent, schooling suffered because of distress at home:

***I faced violent verbal abuse in my home for a while after I came out, and that caused my grades to plummet.***

Another respondent seems to say that schooling issues were not the cause of the emotional difficulties; the trans condition was the cause of the schooling difficulties:

***'I think being trans has caused me a lot of mental health issues which have severely impacted on my ability to do well at school.'***

Perhaps the most distressing comment was this:

***I went to five different high schools in Australia. Two of them directly discriminated against me institutionally, on top of experiencing family violence and abuse at the same time both due to being trans really deteriorated my mental health and my ability to concentrate at school, as well as my ability to interact with my peers at school.***

That does indeed allege 'institutional discrimination' by schools (whatever that might mean in specific terms), but I make this point: among all the varied statements of distress to do with school Not one comment references the religious nature of any school or university.

Not one student in this study, the 'largest national study' we have in Australia, describes feeling offended or excluded because their school or University teaches religious doctrine on sexuality or gender. And yet the Strauss study, and its few pages referencing education issues, is used by the ALRC as the third of only three threadbare pieces of scientific evidence by which to justify Proposition A, this radical assault on religious doctrine on sexuality and gender.

## **2. Reference 3 suffers from the same lack of context as Reference 1**

Did the ALRC not seek to compare the 'large proportion' of transgender students with the 'large proportion' of other students in other studies who also suffered discrimination / exclusion / bullying at school?

We can at least establish a valid figure for the general rate of bullying across all school students. The Australian Covert Bullying Prevalence Study (ACBPS, 2009) was commissioned by the Federal Government and conducted by Edith Cowan University.

Chapter 4.3 details "Rates of bullying" across different year groups:

Year 4 students were more likely to report they were bullied for most of the listed forms of bullying (covert and overt), with approximately two-thirds of these students reporting that they were teased (71%) and excluded from groups (66%). Year 8 students reported the next highest levels of bullying behaviour, with 57% reporting they were teased and 47% reporting they had hurtful lies told about them.<sup>vii</sup>

Note how close the year 4 figures are to the Strauss figure for transgender discrimination of 68.9%. There are high levels of bullying / exclusion across many groups in schools, not just transgender groups, and it would have been worthwhile for the ALRC to give some context, not imply that the high figures for transgender students are something unique.

The ACBPS study notes the types of student who are typically bullied: “both covert and overt bullying are selectively directed at certain children who tend to be anxious, cautious, sensitive, with low self-esteem, or who are considered by the group to have ‘unattractive’ physical, behavioural or social-cultural features, such as obesity, physical disability, arrogance, or who belong to a different ethnic group.”<sup>viii</sup> No mention of sexuality. No mention of feeling marginalised by religious moral teaching. Which reminds us that there are a hundred and one reasons to be bullied; over-emphasising the small proportion of bullying attributed to homophobia / transphobia is unjust to the majority of victims bullied for other reasons.

Accordingly, the ACBPS does not seek to change the law to reduce the importance of religion to LGBT students or muzzle the traditional moral code of religious education institutions.

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### A word of caution to the ALRC in portraying LGBTQ+ students as vulnerable / victims

There is a demoralising consequence of constantly telling young LGBTQ people they are victims of institutional homophobia / transphobia and assuming they will be suicidal until all of society - including religious educational institutions - celebrates their sexuality. Tiffany Jones, cited above as author of earlier La Trobe research, observes:

[The] Gay & Lesbian Alliance Against Defamation (GLAAD 2011) warned staff against perpetuating ‘suicide contagion’ among GLBTIQ youth ... Harwood and Rasmussen (2004) argued that the focus on GLBTIQ youth discrimination and suicide encouraged students to express GLBTIQ identity using a conflated woundedness...<sup>ix</sup>

Another voice expressing the same concern is Melinda Selmys, who formerly lived as a lesbian:

I am exceedingly wary of attempts to put the onus for gay suicide on “heterosexist” culture ... It is not in the interest of any teenager – gay, straight, transsexual, or non-sexually identifying – to be told that suicide is a natural reaction to their reality. I have struggled with depression and suicidal temptations since youth; the removal of moral culpability has never been a help and a comfort when I am working through feelings of inadequacy and self-hatred. On the contrary, more than once, the only thing that kept me from taking my own life was a feeling that I was profoundly culpable, that I was responsible to the people who would suffer for my decisions. To be able to say, “It’s not my fault, I had no choice, too much was expected of me, society made me do it” has only ever helped make it easier to entertain thoughts of self-annihilation.<sup>x</sup>

Responsible adults should beware of suggesting to an impulsive adolescent mind “that suicide is a natural reaction to their reality” and beware the demoralising effect on an individual of being continually told they are weak.

Regardless of how affirming or hostile the surrounding society might be, the moral dissonance of same-sex attraction can cause inner distress for some individuals. But there are many other causes of inner distress for many other individuals, and all of us have to struggle through. It infantilises same-sex attracted individuals if we treat them as victims who cannot cope with their particular challenges, just as it trivialises their suffering if we blame it primarily on the external environment.

The suggestion that we must change the external environment by compelling religious schools to violate their moral code and affirm homosexual behaviour - or they are culpable for gay suicide - is emotional blackmail. It is not the sober jurisprudence we expect from the ALRC.

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### Afterword by ‘stakeholders’

My wife and I had three sons at a Catholic primary school and one son at a Catholic tertiary college. We see education by schools and colleges as an extension of our prior right, and duty, as parents to educate our children – including their education in the best of Christian culture and doctrine. We delegate to schools to educate our children in a way that is consistent with what the Christian faith considers to be true, beautiful and good; the Government must not usurp our prior right (Article 26 ICCPR) or seek, out of its own anti-religious prejudice, to crush Christian culture and doctrine.

This Consultation, and the question of repealing religious exemptions in the Sex Discrimination Act, comes down to sexual ethics, and the question of whether any moral dissent will be tolerated by the State against the normalisation of all things homosexual / transsexual.

It has long been apparent, as I wrote in my 2016 book against same-sex marriage, *Stealing from a Child*, that the anti-religious left is willing ‘to use the force of law to abolish from the public square, and ultimately from the private mind, any moral or religious objection to homosexual acts’.

This ALRC process, at the behest of the current Labor Government, wields the biggest legal stick possible to compel the moral beliefs of the Christian subculture in this country. It is appalling that our nation should have come to this.

Let me restate the sincere and serious moral understanding of sex and marriage which has been the consensus of the West under about five minutes ago, expressed most precisely in the Catechism of the Catholic Church. And let the ALRC decide if it will be party to the cultural cleansing of this ancient moral code.

First, the Catechism’s unflinching teaching: ‘Basing itself on Sacred Scripture, which presents homosexual acts as acts of grave depravity, tradition has always declared that “homosexual acts are intrinsically disordered.” ... Under no circumstances can they be approved.’

Then straight away, the pastoral understanding: ‘The number of men and women who have deep-seated homosexual tendencies is not negligible. They do not choose their homosexual condition; for most of them it is a trial. They must be accepted with respect, compassion, and sensitivity. Every sign of unjust discrimination in their regard should be avoided.... Homosexual persons are called to chastity... they can and should gradually and resolutely approach Christian perfection.’

This is the same Church which is the largest non-government provider of hospital and hospice care for AIDS sufferers in the world. This is the Judeo-Christian culture that distinguished itself for three thousand years from all the surrounding pagan cultures by the covenant of lifelong sexually exclusive marriage between man and woman, ‘made, male and female, in the image of God’.

This is the moral culture which my wife and I, and most of our extended family and friends, have been nurtured in, and which we hope our children will live by.

We as parents and Christian people are not moving from that position; we reject and will resist any coercive attempts by the State to cripple our moral and religious culture at its most vulnerable point: the education of our children.

Yours faithfully,

David van Gend



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<sup>i</sup> ‘Youth Risk Behaviour, Data and Trends, 2011-2021, Centre for Disease Control, Atlanta Georgia USA, [https://www.cdc.gov/healthyyouth/data/yrbs/pdf/YRBS\\_Data-Summary-Trends\\_Report2023\\_508.pdf](https://www.cdc.gov/healthyyouth/data/yrbs/pdf/YRBS_Data-Summary-Trends_Report2023_508.pdf)

<sup>ii</sup> Cover R., “Is same-sex marriage an adequate response to queer youth suicide?” *Online Opinion*, August 22, 2012, <http://www.onlineopinion.com.au/view.asp?article=14017>

<sup>iii</sup> Urban R., “Stereotype of ‘bullied, at-risk’ homosexual youth queried,” *The Australian*, April 21, 2016, accessed August 20, 2016, <http://www.theaustralian.com.au/national-affairs/stereotype-of-bullied-at-risk-homosexual-youth-queried/news-story/f4303adf020d0dfbd28ba787693d716d>

<sup>iv</sup> Jones T., “How sex education research methodologies frame GLBTIQ students,” *Sex Education*, 2013, 13:6, 687-701, <http://dx.doi.org/10.1080/14681811.2013.806262>

<sup>v</sup> *Ibid.*, p.692

<sup>vi</sup> Cover R., “Is same-sex marriage an adequate response to queer youth suicide?” *Online Opinion*, August 22, 2012, accessed August 20, 2016, <http://www.onlineopinion.com.au/view.asp?article=14017>

<sup>vii</sup> ACBPS, ch. 2.5, 133,

[https://docs.education.gov.au/system/files/doc/other/australian\\_covert\\_bullying\\_prevalence\\_study\\_chapter\\_2.pdf](https://docs.education.gov.au/system/files/doc/other/australian_covert_bullying_prevalence_study_chapter_2.pdf)

<sup>viii</sup> *Ibid.*, ch. 2, 26.

<sup>ix</sup> Jones T., “How sex education research methodologies frame GLBTIQ students,” *Sex Education*, 2013, 13:6, 687-701, <http://dx.doi.org/10.1080/14681811.2013.806262>

<sup>x</sup> Selmys M., *Sexual Authenticity, An intimate reflection on Homosexuality and Catholicism* (Huntington IN: OSV, 2009), 30.