

Submission
to the
Australian Law Reform Commission
Inquiry into Religious Educational Institutions and Anti-Discrimination Laws

February, 2023



Please Note:

For the safety and privacy of my former students whose stories I have told anonymously in this submission, I request that my name be withheld from publication.

In the detailed narratives I share here, I have not named the school or any persons referred to and have lightly generalised references to some aspects of the situations described (e.g., specific roles held by staff, or specifics of family members referred to). This is to preserve the privacy of my former students. I would be happy to supply corroborating information if this is sought by the Commissioners, on the understanding that any potentially identifying details I might supply are to remain confidential.

Introduction

In setting out the Terms of Reference for this Inquiry, the Attorney-General, the Hon Mark Dreyfus KC MP, outlined the following areas for law reform:

1. Addressing **discrimination “against a student** on the basis of sexual orientation, gender identity, marital or relationship status or pregnancy”;
2. Addressing **discrimination “against a member of staff** on the basis of sex, sexual orientation, gender identity, marital or relationship status or pregnancy”;
3. Provision for religious educational institutions to “build a **community of faith** by giving preference, in good faith, to persons of the same religion as the educational institution in the selection of staff”.

This submission will address each of these three areas in turn, using a framework of extended factual case studies taken from my direct personal experiences. I have given central place to these extended narratives because I believe that the Commission needs to prioritise understanding the real impact of discrimination on those who have experienced it. After each of the three narrative sections I have also included some key points reflecting on the need for legislative reform in each of the three areas. I conclude with brief further reflections and recommendations.

1. Discrimination against Students:

What I witnessed, how I responded, how the school responded

During 2016 and 2017 I was employed at a very conservative, faith-based school in an Australian state capital city. The school was a member school of Christian Schools Australia, and a long-established school within that movement. I am a trained teacher, but at that time I was employed in a Learning Support role in a Stage 3 open classroom, with three class teachers and around 90 students aged between 10 and 13.

Over the course of 2017 in particular, I witnessed a number of incidents of bullying of students by both staff and peers, related to those students' sexual orientation or perceived sexual orientation or their gender presentation. The following accounts concern the experiences of two of these students, told from my perspective as a member of staff with responsibility for their care.

Student 1: This student was in Year 5, and had attended the school since kindergarten. He was a popular student with a close and supportive friendship network, who expressed a strong Christian faith, frequently took on peer leadership roles, including volunteering to lead class prayers and devotions, and had a history of being chosen by staff to mentor new students as he was known to be consistently kind, caring and thoughtful.

Over the course of 2017, Student 1 had started to think about, and write in his school English journal about, his romantic attraction to other boys. When one of the other staff saw a writing piece which described a boy falling in love with another boy, she said to him that it would be best to tear out that page, and to make sure he didn't express anything like that again. She showed the page to me and then told other staff about it, and beginning from this discussion in the staffroom, at which I was present, I noticed a developing pattern among the staff of this student being treated differently, and labelled as a 'problem'.

Not long after this incident, the marriage equality campaign period began. At this point the peer bullying in Stage 3, targeting students singled out as 'gay', became steadily worse, and Student 1 became a target. My observations suggested that this uptick in peer bullying coincided with campaign initiatives by the school executive. For example, early in the campaign period the school principal sent letters home to all school families urging them to 'vote no', based on arguments that the Christian faith and Christian schooling were under threat, and labelling the 'yes' campaign as anti-Christian. The principal also emailed all staff directing us to promote the 'no' campaign in any discussions with students or families. I was also aware from hearing student conversations in my classroom that many of the students were being exposed to 'no' campaign material both in their families and also in sermons from faith leaders in their home churches.

In my classroom, a small group of Year 6 students began drawing graphically explicit cartoons depicting supporters of marriage equality being violently killed, and leaving these cartoons where other students including Student 1 would see them. (This was a bullying tactic I had already experienced in the same classroom; for example, swastikas were drawn and left on the desk of a staff member whom students believed to be Jewish). As well as the violent cartoons, Student 1 was told directly by the same group of Year 6 students that being gay was "demonic", that "God hated him" and that he was "going to hell". When the boys who'd been telling him this were questioned by teachers, they responded "but we were just telling him what the Bible says"; "it's what God says". The teachers didn't seem to have any adequate response to this - I observed them looking at each other and then dismissing the students without further comment.

One day at the height of the campaign period, the class was crossing the road for a specialist lesson in a public space opposite the school, and one of the Year 6 students said to Student 1 that he should stay on the road and get run over and die, because he was gay and God hated him. The student froze in the middle of the road and had to be pulled off the road by one of his friends, who then stayed with him to ensure his safety. I arrived just after he was pulled off the road (another teacher was supervising the class, but had walked ahead without being aware of the incident) and on being told by another student what had happened, I took both Student 1 and his friend to the school counsellor's office as they were very shaken. Later in the afternoon when they returned to the classroom, I asked the friend to write out an account of the incident (as per the school's procedure) and also wrote out my own incident report. I gave these both to the relevant senior member of the school's executive leadership team after photographing them both on my phone. Some days later, when I raised this while reporting the next major incident, I was told by this senior staff member that the incident report I had submitted had been 'lost', and that there was therefore no record that the incident had ever happened. I then emailed this senior staff member a typed-up copy of my report accompanied by the photographs I had taken of the original hard copies. (As I was classified as support staff rather than a classroom teacher, I had not been given access to the online incident reporting system).

The next serious incident happened around a week later, this time inside the Stage 3 classroom. At a time when I was out of the classroom, the same group of Year 6 boys had told Student 1 that he was "going to hell" and was "demon possessed", and in response the student made another serious attempt to harm himself, in the classroom. I wrote up another incident report and emailed it to the same senior staff member. After this second incident, the three boys perpetrating the bullying were suspended from school until they wrote apologies. Meanwhile, I observed that in the way teaching staff spoke about the situation, the victim of the bullying was being treated as though he was the real 'problem', and the one who 'needed help'; while significant levels of sympathy were expressed by staff for the perpetrators, on the grounds that their suspension could cause tension in their families and give rise to harsh disciplinary responses from their parents.

For the rest of the year, I tried to ensure Student 1's safety by being present in his class group whenever possible during the highest risk times (generally specialist lesson periods outside the home classroom). But I was increasingly directed by a senior teacher to other duties, and warned against 'overstepping my role'. I sought regular advice from my union and followed this advice to carefully document that my actions were taken with the welfare of my students in view.

Aside from vigilant class supervision, the only other thing I could do for Student 1 was to try to offer emotional and spiritual support by taking opportunities to reassure him that he wasn't 'demon possessed', there was nothing wrong with him, he was the person God had created him to be and was valued, accepted and loved for who he was. But I was very conscious of whether other staff were nearby and listening, because all staff had been explicitly directed to support the school principal's expressed beliefs that homosexuality was sinful, and not to express any alternative Christian perspectives. At this point my personal understanding of the theological issues involved was still unclear, but I was very clear in my mind that I was not prepared to follow this directive as I knew that this messaging would increase Student 1's risk of further self harm or suicidality.

The views of most senior and permanent staff appeared to fall into line with the views and directives of the school principal. Especially when there were senior staff present in the staffroom, the school's official position was reiterated and the experiences of Student 1 were minimised or spoken of as though he and any other students like him were to blame for being bullied, or needed 'help' (code for 'conversion therapy' or change/suppression practices) to change who they were.

Student 2: This student was in year 6 and had also been at the school since kindergarten. He had a very outgoing, exuberant personality and was a talented singer and actor, who had been encouraged to develop his singing gifts as part of the student 'worship team' who would lead singing at special assemblies. Over the course of 2017, and increasingly during the marriage equality campaign period, I observed that Student 2 was getting more and more minor negative attention from both classroom teachers and senior staff over issues like his 'attitude' and 'emotionality'. Student 2 expressed that he felt he was being given the message that he somehow wasn't acting "like a boy" enough. My observation also was that this was the messaging the staff were conveying - that Student 2 was somehow under suspicion and considered a 'problem', because his personality didn't fit neatly into the school culture's gender stereotypes, and he presented in a way they associated with 'being gay'. Student 2 himself didn't make any statements at school about his sexuality or gender identity, to my knowledge.

Student 2 was the target of a limited amount of verbal homophobic bullying from other students (being called 'gay', which was only ever used as a slur in that environment). But he had a large group of close and supportive friends, a popular profile among the students for his performance talents, and his family was influential in the community; and my observation was that these factors gave him some protection from peer bullying.

One day in Term 4, I found Student 2 hiding behind the door in the small room where I held my individual student learning support sessions. He was curled up on the floor sobbing and shaking. He told me that a very senior member of the school executive leadership team [not the same person referred to in the account of Student 1] had called him over in the playground and told him that he didn't like the way he talked (not the content of what he was saying, but his natural intonation, gestures and mannerisms). This senior staff member had said to Student 2, "You disgust me". Student 2 was too upset to articulate clearly any more of what this senior staff member had said, but it was clear that those words had affected him the most. He described feeling angry and confused, saying to me, "I don't know how to be a different person than who I am".

Student 2 told me that he had nobody at home he could talk to safely about these issues and that he didn't want his family to be ashamed of him. He said he could occasionally FaceTime a close relative who lived interstate, who was supportive of him, but apart from that he had nobody he could talk to about what had happened. He felt like all he could do was hope to stay out of the way of this senior staff member as much as possible, but this would be difficult as he was about to move into year 7 where they would have increased contact.

I felt helpless in this situation, as I knew from my other interactions with staff that there was nobody in the school community who would be willing to openly support this student, or even equipped to give him the basic reassurance that it was OK for him to be himself and that he didn't have to try to change who he was. As with Student 1, all I felt that I could do was quietly express my support for him whenever I had a chance without being overheard, and make sure he knew I was a safe person if he wanted to talk.

Discrimination against students - key points highlighted by my experience:

- All students, including these students who were becoming aware of their minority sexual orientation or gender identity/presentation, have a right to a safe learning environment. In their

responses to the described incidents and patterns of peer bullying, school staff culpably failed to create or maintain a safe learning environment for some of the most vulnerable students in their care.

- The school's actions in deliberately exposing students and families to negative rhetoric about LGBTIQ+ people - including promoting allegations that LGBTIQ+ campaigners had an agenda to destroy Christian schools, and directing staff to repeat negative rhetoric to students and their families - contributed to the unjust denial of a safe learning environment to these vulnerable students.

- The responses of teaching and executive staff included in different cases 'turning a blind eye' or culpable negligence; spiritually pathologising and blaming the targeted students; explicitly aligning their sympathies with the perpetrators; warning me, and by inference other staff, against reporting incidents of homophobic bullying; and perpetrating such bullying themselves (in the case of Student 2). At no time was these students' right to a safe learning environment acknowledged, or any steps taken towards addressing the safety concerns raised by my incident reports, or in conversation with teaching staff.

2. Discrimination against Staff:

What I experienced, how other staff responded, how the school responded

As mentioned above, once other staff became aware that I was documenting and reporting incidents of homophobic bullying, a senior teacher to whom I reported began to intervene more in my previously agreed-upon schedule of roaming student support provision, redirecting me to a changed schedule of duties and warning me against 'overstepping my role'. From this point, upon advice from my union, I ensured that I comprehensively documented my actions with reference to the welfare of the students in my classroom.

I began to feel as though I was under scrutiny, feeling extra vigilant and anxious about being observed offering support to the targeted students, despite the fact that the support I was expressing consisted only of basic Christian messages of God's love, acceptance, and inclusion, which in my view any Christian teacher should have been able to articulate unequivocally.

At no time did I express particular views about the reconciliation of sexual minority identity with tenets of faith (e.g. 'affirming' theology); although I now believe that 'affirming' theological views would have been helpful for those students to hear, at the time I was still in the process - prompted by my efforts to support my students - of rethinking the conservative Christian attitudes to sexual minorities that I had uncritically accepted in my youth. I was also deeply fearful at this point of the consequences for me if my family and religious community found out that my attitudes were shifting.

In the staffroom, the generally expressed attitudes of other staff, especially in contexts where senior or executive staff were present, were strongly negative towards LGBTIQ+ people, often using pejorative religious language like 'satanic' or 'demonic' to describe the LGBTIQ+ community and the 'yes' campaign. I began to avoid going to the staffroom during my breaks, as I increasingly found these conversations difficult to be present for, having observed the way these attitudes were contributing to an unsafe environment for my students.

However, I also witnessed noticeable fear and anxiety among some staff over the course of that year, especially among casual or newly-employed staff. Some of these members of staff who saw how I was pulled up for supporting the bullied students became fearful for their positions in the school, with some privately communicating to me that they wanted to support the students, but didn't feel that they could risk losing their jobs.

By the final weeks of Term 4, the school executive had begun to float the suggestion that the support staff budget would unexpectedly need to be reduced for the following year and that one Learning Support position in the primary school would be cut. It was clear that this was a cover story for the principal's decision not to renew my contract, since all primary staff were fully aware that the school's Open Learning system was designed to include, and could not function without, a dedicated Learning Support employee in each stage classroom. I also believe, based on discussions with my union and with other staff at the school and on a termination interview I witnessed earlier that year, that the principal would have attempted to terminate my position before the end of my rolling contract, had I not made the school aware early in Term 4 that I was a union member.

Two or three days before the end of the school year, I was called to the principal's office and informed that for budgetary reasons my rolling contract would not be renewed. I was unwilling to engage with the principal in any substantive way, especially since I had earlier witnessed his verbally abusive treatment of another staff member whom I accompanied as a support person during her termination interview, and so I briefly thanked him for telling me and left the interview. It was announced to the Stage 3 cohort that I would be leaving at the end of the year, and besides spending my final day farewelling all the students, I also made time to seek out the school counsellor and ask her to do her best to protect Students 1 and 2 from any 'conversion therapy' efforts, which I now understood would increase the mental health risks to these already vulnerable students. During this final conversation with the school counsellor, she asked me sympathetically whether I had been exposed to 'conversion therapy' myself. Although I immediately denied it and was genuinely unable to understand at the time why she had asked me this, her question was the catalyst for me to begin to accept a realisation, once I was no longer an employee of the school, that I myself was gay but had deeply suppressed any awareness of this as a survival mechanism in the very conservative religious context in which I had spent my whole life. If not for the research I had been doing to equip myself to better support my students, and then this conversation with the school counsellor, I would perhaps have remained unaware of this for much longer.

Even if I had become aware of my sexual orientation before leaving the school, it was clear to me that there would have been no possibility of safely acknowledging this to anyone in my workplace. In staffroom conversations, I had heard other staff clearly express a visceral abhorrence of LGBTIQ+ people, and I knew that they would believe that I wasn't a Christian at all, if I came out as gay.

Aside from that one private conversation with the school counsellor, at no point was any question raised by anyone at the school about my own sexuality. So far as I am aware, my position was non-renewed, not because I myself was gay - given that I was not even aware of this myself at the time - but purely as a response to my actions in documenting incidents of homophobic bullying and seeking to ensure a safer learning environment for the targeted students. These actions appear to have been understood by school leadership as indicating a belief framework with respect to questions of sexuality that was unacceptable to them, despite the fact that I was never asked about my beliefs in this area by any of the other staff, and in fact had formed no clear framework of belief at this point, but was motivated solely by concern for my students' safety, welfare and wellbeing.

My treatment by the school, taken in conjunction with the series of communications from the principal to families and staff during the marriage equality campaign (referenced above), indicated to me that the school executive was unwilling to allow any freedom of conscience or belief in the matter of Christian attitudes to sexual and gender minorities, despite the fact that within the Christian community there exists a broad spectrum of understandings of human sexuality and gender identity, and of interpretations of the Biblical texts which touch on these issues.

Further to this unwillingness to concede a range of interpretations, my treatment by the school also indicated a determination to silence and exclude anyone who showed openness to a different understanding or approach to the treatment of sexual minorities - even in circumstances, like mine, where this openness to a different approach was prompted by witnessing serious harm to a child and realising that that child would be placed at further risk if appropriate support was not provided.

The students whose experiences I have described above needed and deserved to have teachers who could support them without the fear that by doing so they could lose their jobs. I chose to support them, albeit semi-covertly, despite this fear, which subsequent events proved to be well-founded; but I heard from, and witnessed the behaviour of, other teachers who out of fear chose not to show any of the support they could see that those students needed. I don't say this to blame them. None of us should have been placed in this position, and the far too limited support the students did receive from me should have been much more fully and openly expressed. But the fact is that ultimately the students' traumatic experiences were compounded by this failure of support from those who had a duty of care towards them. If the school had been a place where staff could openly express validation of LGBTIQ+ identities and experiences, and where staff could model for students the possibility of living out both their faith identity and their sexual orientation or gender identity, their time at the school could have been far less traumatic at a critical time in their identity formation.

Discrimination against staff - key points highlighted by my experience:

- The loss of my position was unfair from the perspective of my own rights as an employee. The school executive should not have acted in retaliation for my attempts to ensure student safety. As a result of how I was treated, I sustained a severe workplace psychological injury and have been unable to return to school-based employment since these events.
- The current climate created by the exceptions is directly responsible for psychologically unsafe staffing environments such as the one I experienced. Given the widespread Christian culture of hostility towards sexual minorities and/or repression of sexual orientation and gender identity awareness, there will frequently be staff in faith-based schools who even well into adulthood are beginning to come to terms with their sexuality or gender identity for the first time, as I was. These staff need supportive workplaces and communities, not the added distress of knowing that their jobs are at risk if they reach out to anyone for support at what is very often, at least initially, a confusing and distressing time.
- If adopted, the Commission's Consultation Proposal 9 would give employers the ability to appeal to an alleged "active undermining of the ethos of the institution" in just such situations as mine outlined above. This Proposal would deny protections to staff who, like me, are motivated by a concern for student safety and wellbeing, and who out of this concern act in ways that are fully compatible with traditional Christian values of compassion and justice, but whose actions may be painted by homophobic institutional leadership as "undermining the school's ethos" in order to remove from the school environment any possibility of the kind of acceptance and support

that LGBTIQ+ students need. This Proposal must be reconsidered, and in my view removed.

- Regarding this need of students for support, and even leaving aside the rights of staff to a safe working environment - the Commission must consider the negative impact on students when their teachers are discriminated against on the grounds either of their own sexual orientation or gender identity, or of their beliefs, attitudes or actions in support of sexual or gender minority students. My students needed, and deserved, to have adults around them who could show them that it was possible to integrate the different aspects of who they are and to live with integrity and acceptance as members of their communities. Students need to know that there are staff who will support them and look out for them. And they need to see that it is possible to remain an active member of their faith community, if they wish to, without having to deny or try to change who they are. Having teachers who are able to be open about their faith and their sexuality would provide a critical positive contribution to these students' wellbeing at a time and in a context where they need it most. The existence of the current exceptions relating to staff unfairly discriminates against both staff and students, as it enables schools to deprive students of this critical support to their wellbeing.

3. Religious educational institutions as “communities of faith”

Both Student 1 and Student 2 were so badly affected by their experiences at the school during that year, and by the failure of school leadership to protect or support them, that they ended up leaving the school at the same time that I left, as I learned the following year from a former colleague. While this was clearly the best decision for both of them from the perspective of their own wellbeing, for each of them it meant the loss of the entire community and social and spiritual support system which they had been immersed in and nurtured by since the age of four or five, and with which their whole families were closely enmeshed.

This school, which explicitly saw itself as a “community of faith”, had been a community in which, prior to 2017, these two students had felt a love and support that they were taught and believed would always be there for them. Religious language around concepts of God's unconditional love, and the Christian community as their true and eternal family, was heavily promoted by the school, and further reinforced by communal singing, prayer and worship times which drew students emotionally into experiences of this apparently unconditional love and belonging.

But this all abruptly evaporated for Students 1 and 2 at the point where they reached early adolescence and began to develop an awareness of being ‘different’ in a way that was religiously stigmatised. To have this love and acceptance suddenly removed, and replaced by expressions of hate and condemnation, was profoundly bewildering and distressing for each of these two students. I directly witnessed my students' distress and their confusion, as they genuinely could not understand why they went from being treated by the school as exemplary members of the community who had regularly been called on to be spiritual leaders of other students in various roles, to being treated as ‘problems’ who were apparently not worthy of being protected from harm or of being offered care and acceptance when they most needed it.

Over the past five years since leaving the school, I have heard from other ex-students who were also forced to leave the school after experiencing similar bullying and abuse from both students and staff as they became aware of their sexual orientation or gender identity. The climate of anti-LGBTIQ+ sentiment in 2017 may have been particularly heightened, but it was not in itself

exceptional within the school's culture, as the accounts I have heard from numerous other students since that time have confirmed.

Schools as “communities of faith” - key points highlighted by my experience:

- In a societal and legislative context of universal and compulsory education, every student has a right to belong and to be treated fairly and without discrimination in their educational community. From the perspective of minor students undertaking primary and secondary education, their membership in their school communities cannot reasonably be characterised as a voluntary association. They are not there by their own independent choice and they are not free to leave by their own independent choice. The educational setting in which they have been enrolled is first and foremost a learning environment, an educational community, and all students have a right to physical, emotional, psychological and spiritual safety within their learning environment. This right to safety is fundamental and must be prioritised over any proposed rights-based framing in the area of institutional “faith community” formation or maintenance.
- If faith schools are to be conceded their desired framing of their educational environments as “communities of faith” while operating in a context of universal and compulsory education, then they have a responsibility to ensure that their communities, with regard not least to their faith-based character, are inclusive of all students and staff; are compliant with the full range of anti-discrimination legislation, without special exceptions; and implement concrete, proactive, and preferably regulated measures to ensure that faith frameworks are not in any circumstances drawn upon as justification for formal or informal exclusionary purposes or behaviours.

Conclusion and Recommendations

Conclusion

The experiences I have shared here, and the many other similar stories that have emerged from ex-students and ex-staff of faith-based schools, are the reason why legislative reform is essential and must not be further delayed. While the current exceptions stand, there is no protection for students like my former students, or for teachers and other school staff like me. My students needed, and deserved, a safe learning environment; and they needed, and deserved, adults around them who could both tell them and model for them that it was possible to integrate the different aspects of their identities and to live with integrity and acceptance as members of their school and faith communities. But they were denied any possibility of this by the school's unwillingness to tolerate even the generalised messages of acceptance which I felt able to offer.

Consistently over the last six years and more, lobby groups such as Christian Schools Australia have promulgated disingenuous narratives of LGBTIQ+ people as hostile ‘outsiders’, with an agenda of wanting to infiltrate faith school communities to destroy their uniquely Christian character. But the reality is that their targets are not outsiders, but ‘insiders’ - people of faith who are deeply involved in our faith communities and strongly committed to them, who upon becoming aware of our sexual minority identity are suddenly finding ourselves treated as at best a problem and at worst an enemy. The rejection, loss of sense of identity, and loss of community that we experience at this point can be devastating. It is against these psychological harms perpetrated by leaders within our own faith and faith-school communities that comprehensive legislative protections are necessary.

The school I worked at explicitly denied that LGBTIQ+ people could validly express Christian faith and be accepted as part of their faith community, and actively painted LGBTIQ+ people as enemies of the faith. It is not surprising that in this context some students took the opportunity to convey this messaging to other students, and to do so violently and with seriously harmful results. Neither, unfortunately, is it surprising that in this context the majority of teaching staff found themselves unable to offer any meaningful expressions of care and acceptance to the targeted students; or that a minority of staff actively weaponised this harmful messaging to inflict psychological harm.

Christian Schools Australia and other religious-education lobby groups are aware of the many cases of negative and even life-threatening experiences such as those I have described above. But they are still vehemently opposing actions such as the proposed reforms which would protect students in their schools, and arguing that the handling of issues around the care of LGBTIQ+ students can safely be left in the hands of faith-based schools to deal with in pastorally sensitive and appropriate ways. Having heard evidence of the lived experiences of LGBTIQ+ students and staff, the Commission must reject these arguments and proceed with recommendations for comprehensive reforms that will offer meaningful protection in law to all members of faith-based educational communities.

There is no reasonable prospect of a legislative solution that would both satisfy the demands of the Christian schools lobby groups and also adequately protect vulnerable children and young people. This has been demonstrated time and again as religious lobby groups have rejected offers of compromise. Meanwhile, students in faith-based schools continue to experience harms. These children and young people need the protection of the law, as also do school staff with dual LGBTIQ+ and faith affiliation identities, since even into adulthood this dual identity is associated with heightened vulnerability.¹

Legislative reform that removes the current exceptions would make a significant difference to the experiences of LGBTIQ+ students - *contra* the arguments of lobby groups that they never use the exceptions in any case to expel students on the grounds of sexual orientation or gender identity. It may be true that schools like my former workplace have rarely employed the exceptions directly to expel students; but this claim is a smokescreen for the other forms of harmful treatment that do occur within faith-based schools, of the kind I have given examples of above. These schools can and do appeal to the exceptions to argue that the state has recognised their legitimate right to treat LGBTIQ+ students and staff differently; in turn, this narrative of legitimisation creates a climate of impunity in religious schools, as, regardless of whether the exceptions are ever wielded directly, their very existence functions to excuse harmful treatment of LGBTIQ+ members of the school community.

Recommendations:

- **Implementation of Proposals 1 through 6; 8; and 11 through 14, substantially as drafted.**
- **Review and redrafting or discarding of Proposals 7, 9 and 10.**

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¹ see e.g. Lytle, Blosnich, De Luca & Brownson, 2018. Association of Religiosity with Sexual Minority Suicide Ideation and Attempt. *American Journal of Preventive Medicine*, Volume 4, Issue 5, p644-651. <https://psycnet.apa.org/record/2018-19175-008>