2014/10: Should federally funded school chaplains be appointed to Australian state schools?

What they said

'Chaplains are supposedly not allowed to preach to students and yet they are employed by Scripture Union Queensland.... If that is not a conflict of interest then I don't know what is. Public schools should be secular and free from religion'

From a letter by V. Millson of Burbank, published in The Courier Mail on November 7, 2013

'School chaplaincy is pastoral care, not pedagogy. It's not about converting students, but it is about providing social, emotional and spiritual support'

Peter James, a spokesperson for the National School Chaplaincy Association

The issue at a glance

In May, 2014, two developments occurred in relation to the National School Chaplaincy Program. Firstly the federal government pledged to continue funding the program over the next four years. The program was allocated nearly \$250 million in the 2014 federal budget in order to allow it to continue to operate over this period. The government also indicated that these funds could no longer be used to employ secular counsellors in the event that a school could not find a suitable chaplain.

On June 19, 2014, the federal court ruled, for a second time, that the provisions being used to supply federal monies to the National School Chaplaincy Program were not sanctioned by the Constitution. Despite this, the federal government has indicated its determination to find alternate means whereby it can continue to fund the program. In the light of these events there has been extensive recent debate surrounding the value of the program and the

desirability of its continuance.

Background

(The information supplied below is an edited version of the Wikipedia entry titled 'National school chaplaincy program'. The full text of this entry can be accessed at http://en.wikipedia.org/wiki/National_school_chaplaincy_program)

Since 2007, the National School Chaplaincy Program (NSCP) has been funded by the Australian federal government to provide chaplains in Australian primary and secondary schools. The chaplains are to give 'support and guidance about ethics, values, relationships and spirituality'.

Chaplaincy services are provided by religious service companies which are predominantly Christian, though non-denominational, including Scripture Union Queensland, Genr8 Ministries in New South Wales and Access Ministries. On 27 September 2013 there were 2,339 chaplains and 512 Student Welfare workers in Australian schools. On 7 September 2011, as Education Minister, Garrett announced an alteration to the NSCP by requiring that new chaplains have a 'Certificate IV in Youth Work, Pastoral Care or an equivalent qualification'. Previously, no formal qualifications were required.

The alterations also offered schools the opportunity to employ a 'secular student well-being officer' instead of 'a religious support worker' (chaplain), following concerns over the appropriateness of having a religious worker in a public school. (Prior to September, 2011, schools were only able to hire a secular welfare worker under the program if they could demonstrate that their efforts to find an ordained chaplain had failed.) In May 2014, however, the provision to allow secular student well-being officers to be funded under the chaplaincy program was removed, meaning all chaplains must once more be affiliated with a religion.

In the 2014 federal budget, the government provided \$243.8 million, over a four year period, to continue the NSCP.

High Court challenges

2012 High Court challenge

The High Court case Williams v The Commonwealth of Australia & Ors [2012] HCA 23 was related to executive prerogative and spending under section 61 of the Australian Constitution. In June 2012, the High Court held that the Commonwealth's funding agreement for the program is invalid.

2014 High Court challenge

A second High Court challenge, against the amended program, was mounted by the 2012 litigant and was heard by the court in May 2014. The focus of this case was on whether the federal government has the power to fund the NSCP directly through local organisations. This second challenge also succeeded in the High Court.

Religious representation

While the NSCP is formally not religion-specific, the chaplains employed under the program are predominantly Christian. In 2011, one study stated that 96.5% of the chaplains employed under the program were Christian, while only 64% of Australians identified as Christian (based on the 2006 census).

By December 2014, the 623 schools which have hired a secular welfare worker via school chaplaincy funding will have instead to hire a chaplain as the provision to allow secular welfare workers to be employed through this program is being removed.

Internet information

On July 4, 2014, The New Daily published an opinion piece in favour of school chaplains written by Peter James, a spokesperson for the National School Chaplaincy Association. The piece is titled 'The case for: Why chaplains are good for schoolkids' and can be accessed at http://thenewdaily.com.au/news/2014/07/04/case-school-chaplains/

On July 2, 2014, The New Daily published an opinion piece by Saman Shad, a Sydney-based freelance writer, playwright and storyteller. The piece argues in favour of secular education and is titled 'Comment: Keep religion out of my child's classroom'

It can be accessed at http://thenewdaily.com.au/news/2014/07/02/keep-religion-out-of-my-childs-classroom/

On July 1, 2014, On Line Opinion published a comment by Brian Greig, a former Democrats Senator, which was critical of the National School Chaplaincy Program primarily on the grounds that many chaplains were inadequately qualifies and did not offer impartial advice to homosexual students.

The full text of this comment can be accessed at http://www.onlineopinion.com.au/view.asp?article=16450&page=2

On June 18, 2014, The Sydney Morning Herald ran a report detailing claims made by retiring Senator Louise Pratt that a number of school chaplains had made damaging remarks to homosexual students. The report is titled 'Anti-gay chaplains driving children to self-harm, says outgoing Labor Senator Louise Pratt'

The full text of this report can be accessed at http://www.smh.com.au/federal-politics/political-news/antigay-chaplains-driving-children-to-selfharm-says-outgoing-labor-senator-louise-pratt-20140618-3adyv.html

On June 17, 2014, the ABC's Religion and Ethics website posted a comment by Rodney Croome, is a member of the Tasmanian Department of Education LGBTI Issues in Education Working Group and is National Director of Australian Marriage Equality. The piece is titled 'School Chaplains can be Friends not Foes in Anti-Homophobia Fight' It can be accessed at http://www.abc.net.au/religion/articles/2014/06/16/4026248.htm

On June 1, 2014, The Courier Mail published an opinion piece on aspects of the National School Chaplaincy Program titled 'Opinion: Allocating \$245.3m for school chaplains at odds with Budget cuts'
The piece, written by Mike Bruce, is essentially critical of the program. It can be accessed at http://www.couriermail.com.au/news/opinion/opinion-allocating-2453m-for-school-chaplains-at-odds-with-budget-cuts/story-fnihsr9v-1226938435156

On May 19, 2014, Radio National's 'Life Matters' ran a segment on the federal government's budget decision to renew funding for school chaplains for the next four years.

The segment features the views of Peter James, the chief executive officer of Scripture Union Queensland, who favours the chaplaincy program, and David Stokes of the Australian Psychological Society, who believes that federal funding would be better spent extending specialist secular counselling services in schools.

A full audio recording of this program can be accessed at $\frac{\text{http://www.abc.net.au/radionational/programs/lifematters}}{\text{/school-chaplains-or-counsellors3f/5461234}}$

On May 18, 2014, The Sunshine Coast Daily ran a report titled 'School chaplain investigated for preaching to students '. The report gives details of a school chaplain who is being investigated in relation to claims made on his website which suggest he is using his position as a school chaplain for preaching.

The full text of this report can be accessed http://www.sunshinecoastdaily.com.au/news/school-chaplain-investigated-preaching-students/2261645/

On May 15, 2014, the ABC ran a news report titled, 'Budget 2014: Funding for secular counsellors cut in school chaplaincy program'

The full text of this report can be accessed at http://www.abc.net.au/news/2014-05-15/cut-to-secular-advisors-program-in-federal-budget/5455176

On March 26, 2014, The News Mail published a report titled 'Bundaberg schools back their chaplains'. The report gives the opinions of a number of school principals and others praising the work done by school chaplains. The full text can be accessed at http://www.news-mail.com.au/news/tour-backs-chaplains/2210120/

On March 20, 2014, the ABC's Religion and Ethics website posted a comment by Margaret Maddox titled, 'Too Much Faith in Schools: The Rise of Christian Schooling in Australia'. The author favours secular education in Australia, and traces critically the increasing integration of religious instruction and perspectives within the different state education systems.

The full text of this article can be accessed at http://www.abc.net.au/religion/articles/2014/03/20/3968199.htm

On November 7, 2013, The Courier Mail published a number of reader letters giving a range of views on the operation of the National School Chaplaincy Program. These letters can be accessed at http://www.couriermail.com.au/news/opinion/letters-school-chaplaincy-programs-are-a-conflict-of-interest/story-fnihsr9v-1226754507194?nk=6dbf3742ce92c16844136c1c4e18be9d

The National School Chaplaincy and Student Welfare Program Guidelines published July 2012 can be accessed at http://www.saasso.asn.au/wp-content/uploads/2013/04/National-School-Chaplaincy-and-Student-Welfare-Program-Guidelines.pdf

On June 21, 2012, The Conversation published a comment by Cathy Byrne, Sociology Tutor at Southern Cross University. The piece is titled 'School chaplaincy case: a missed opportunity for secular education' and is critical of what the author sees as the increase in religious education and influence within state schools in Australia. It sees the chaplaincy program as a part of this trend.

The full text can be accessed at http://theconversation.com/school-chaplaincy-case-a-missed-opportunity-for-secular-education-7789

In September, 2009, Edith Cowan University's School of Psychology and Social Science released a report titled 'The Effectiveness of Chaplaincy as provided by the National School Chaplaincy Association to Government Schools in Australia'

The report was produced by Dr Philip Hughes of the Edith Cowan University and Prof. Margaret Sims of the University of New England.

The report judged the program effective, though it needs to be noted it was commissioned by the School Chaplaincy Association and did not consider the effectiveness of the chaplaincy relative to secular provision.

The full text of the evaluation can be found at http://schoolchaplaincy.org.au/files/2012/09/chaplaincyeffectiveness.pdf

Scripture Union Queensland (SUQId) is one of a number of organisations which supplies chaplains to state schools in Australia. The Union's homepage, including its mission statement, can be accessed at http://www.suqld.org.au/mission-values

Scripture Union Tasmania (SUTas) is one of a number of organisations which supplies chaplains to state schools in Australia. On its Internet site it supplies a number of arguments supporting the value of the chaplaincy program to schools.

These can be accessed at http://www.onlineopinion.com.au/view.asp?article=16450&page=2

The National School Chaplaincy Association Internet site has a section given over to responding to a number of claims about the chaplaincy program it characterises as 'myths'.

This section of the site can be accessed at http://schoolchaplaincy.org.au/about-school-chaplaincy/

Arguments against federally funded school chaplains in state schools

1. State education within Australia is secular and non-denominational

Australia's public education system was founded prior to federation on three principles – that it should be universal, free and secular. The last two provisions were intended to ensure the first. It was argued in all the then colonies that if the aim were to have all Australian citizens receive an education that needed to be provided without charge and without the obstacles attendant on conflicting religious beliefs.

In an analysis published on March 20, 2014, by Marion Maddox on the ABC's Religion and Ethics site, it is explained that by the end of the nineteenth century 'New South Wales, Western Australia and Tasmania had left room for clergy or their delegates to teach children of their own denominations in public schools during school hours; while Queensland and South Australia followed the Victorian path of keeping religion out of public classtime altogether. All, however, definitively ended "state aid" to denominational schools: if families wanted religious schooling, the mostly devout Christians and Jews in our colonial parliaments decided, then parents would have to arrange it themselves.' Queensland's former premier (and later chief justice) Charles Lilley summed up the common view. He told the parliament in 1873 that, if Members wanted to fund religious schools, then either the government would have to endorse a single state religion (a course seen as unjust and divisive) or else fairness required that 'there must be established in every portion of the State endowed schools of every denomination; at the expense of the State, schools must be built, and teachers employed, for each and all of the religions professed in the community.' Lilley argued that obviously the state could afford such multiple provision, and thus the Queensland parliament legislated, in common with the other Australian states, an end to public funding of religious schools in 1875.

Critics of the National School Chaplaincy Program argue that it fundamentally undermines the long-established principle that state schools should be secular.

2. School chaplains might use their position within schools to promote their religious views to students It has been claimed that some chaplains may use their positions within schools to promote their own religious beliefs. An investigation has recently been begun into the conduct of a Brisbane school chaplain who stated on his website,

'Discipleship ... is ultimately a journey deeper into a relationship with Jesus, and to becoming more effective at seeing and establishing the Kingdom of God in our world.

It is my mission to disciple others, including kids and their families in the schools I work in, as well as those around me in church life.'

Though groups like Scripture Union Queensland (SUQId) which supplies chaplains to state schools in Queensland claim to provide psychological, emotional and spiritual guidance, but not religious instruction, the group's Internet site includes in its mission statement 'n all that we do, we seek to uphold our core VALUES: respect; stewardship; discovery; that children and young people matter; and that we work together to positively influence children's lives.

These rest upon our FOUNDATION: with Jesus as our example, we seek to model the compassion and teaching woven through the Gospel. We are committed to thoughtful reading of the Bible and prayer.'

Critics of the program argue there is little difference between 'thoughtful reading of the Bible and prayer' and religious instruction.'

In a letter published in The Courier Mail on November 7, 2013, V. Millson of Burbank stated, 'Chaplains are supposedly not allowed to preach to students and yet they are employed by Scripture Union Queensland.... If that is not a conflict of interest then I don't know what is. Public schools should be secular and free from religion.'

3. School chaplains religious beliefs may prevent them giving disinterested support to all students

It has been claimed that the religious beliefs of some school chaplains may prevent them giving disinterested advice to students, especially those students whose life choices the chaplain's religious convictions leads him or her to reject. Particular concern has been expressed as to the quality of support homosexual students might receive from school chaplains.

Outgoing Labor Senator Louise Pratt has used one of her final parliamentary speeches to call for the abolition of the school chaplaincy program, saying it is harming vulnerable gay and lesbian children.

Senator Pratt said a recent survey had found anti-gay chaplains had driven schoolchildren to self-harm and had told them to 'pray the gay away'.

Senator Pratt said an online survey by gay rights group All Out, which attracted 2200 responses, had uncovered dozens of firsthand student accounts that describe chaplains as being 'explicitly anti-gay'. One respondent said their school chaplain had described gays and lesbians as 'unnatural, indecent and perverse'. Another said a gay friend had overdosed on medical pills after their school chaplain said being gay was a 'degrading sin' that sends people to hell. Senator Pratt further stated, 'As well as the two stories I have just quoted, students described chaplains helping them to 'pray the gay away' and advising them to sleep with a member of the opposite sex to 'correct' their same-sex attraction. One very serious story involved a student being told by a chaplain that they should leave home because they had homosexual parents.'

4. Trained secular counsellors are likely to be better qualified to offer psychological support to students Critics of the school chaplaincy program have argued that many of the chaplains are under-qualified to perform counselling and support work and that these tasks would be better performed by fully qualified secular counsellors. In an opinion piece published by On Line Opinion on July 1, 2014, former Democrat Senator, Brian Greig, stated, 'To be a school chaplain it is enough simply to hold a Certificate in Pastoral Care or Theology and a diploma in Youth Work....'

Mr Greig went on to explain, 'It's true that many chaplains have some qualifications beyond this, such as teaching or family therapy, but it's not a requirement. They are not psychology graduates, professional psychiatrists or qualified counsellors...'

It was only in September 2011, that it was mandated that new chaplains have a Certificate IV in Youth Work, Pastoral Care or an equivalent qualification. Prior to that, no formal qualifications were required. Critics of the program view this as a bias in favour of getting chaplains into schools, regardless of the relevance or utility of their qualifications and that doing this potentially deprives students of access to better and more appropriately qualified secular counsellors to offer them assistance. The new provision that only chaplains (meaning those with a theological qualification) can be employed under the National School Chaplaincy Program, even when a suitably qualified chaplain cannot be found and a suitably qualified secular counsellor is available is seen as proving the inappropriate priorities of the Program.

5. The federal government has no constitutional authority to fund school chaplains

In June 2014, the High Court has upheld a challenge to the National School Chaplaincy Program, ruling the law used to maintain Commonwealth funding for chaplains is unconstitutional.

Federal funding was intended specifically for schools to hire faith-based chaplains rather than social workers. Under the program, 3700 schools are eligible for up to \$72,000 funding to employ chaplains.

In a unanimous decision, six judges on the High Court held that the federal government's agreement to fund the Scripture Union of Queensland to provide chaplaincy services to Queensland schools was unlawful.

The judges ruled that the government could not spend money on specific programs that fall outside the powers given it under the Constitution. This decision means that the federal government can only validly fund programs which are attached to a Commonwealth head of power.

The Commonwealth and the Scripture Union of Queensland had argued that the payments to chaplains fell under the Parliament's constitutional power to make laws for 'benefits to students'.

But the High Court held that the funding agreement 'does not provide material aid to provide for the human wants of

students'.

Arguments in favour of federally funded school chaplains in state schools

1. School chaplains do not promote their particular religious beliefs

School chaplains are specifically prohibited from attempting to teach their particular religious beliefs or to convert students to their religious denomination.

The Program Guidelines and Code of Conduct for the National School Chaplaincy program specifically state that no chaplain is to provide 'religious education in their schools' as part of the program. If the school decides to offer religious instruction for interested students it is recommended that a different person is used for this purpose, so as not to create role confusion in students' minds.

The Guidelines also prohibit chaplains 'initiating faith discussions with a view to coercing or manipulating students to a particular view or spiritual belief.'

The Guidelines recognise the potential for new communications media to be used by chaplains in order to teach a particular religious persuasion. This is also specifically prohibited. Chaplains are to refrain from 'using other methods such as social media – blogs and facebook, or newsletters and school websites, to proselytise/evangelise to students within their school, in their role as a Program funded school chaplain/student welfare worker.'

In an opinion piece published on July 4, 2014, in The New Daily, Peter James, a spokesperson for the National School Chaplaincy Association, stated, 'School chaplaincy is pastoral care, not pedagogy. It's not about converting students, but it is about providing social, emotional and spiritual support.'

2. School chaplains have a breadth of life experience which makes them of particular value to students Chaplains typically have much experience in helping people deal with trauma and loss. In an opinion piece published on July 4, 2014, in The New Daily, Peter James, a spokesperson for the National School Chaplaincy Association, stated, 'At times of grief and loss, a school chaplain is available to the whole school community for support, working with the rest of a school's pastoral care team as students and teachers come to terms with a tragedy or natural disaster.' Queensland North State School principal Veronica Geiger has stated, 'Our students, staff, parents and the entire North community would suffer a great loss if we didn't have Chappy Sel.

After the devastating 2013 floods, many of our students were distressed and anxious. Their emotional health and wellbeing were at risk.'

Mrs Geiger noted that some of her students and their families had lost everything to the floods and that Chappy Sel did an 'awesome job' in supporting their recovery.

In addition all chaplains have specific training in assisting students with social and emotional problems. As of 201, all chaplains working within the National School Chaplaincy program are required to have Certificate IV in Youth Work, Pastoral Care or an equivalent qualification. Many chaplains have significant qualifications beyond this.

Chaplains are also engaged members of their local communities and so are in a position to refer students, with the authorisation of the Principal, to support networks and other relevant specialists from outside the school.

Peter James has explained this function. 'All school chaplains are trained in how to recognise [psychological] issues and to refer [students] to psychologists or others. The chaplain becomes a source of referral and a support person, for the student and their family.'

3. Though state schools are secular, a majority of Australians profess some religious belief

A majority of Australians have a religious belief. The 2006 Australian Bureau of Statistics data indicate that 79 per cent of Australians declare themselves as the followers of a particular religion. About 13 million or 64% of Australians called themselves 'Christian'. Buddhism, Islam, Hinduism and other religions, though marked minorities, have grown, largely due to increased immigration from the Asian region.

This data suggests that a majority of Australians recognise a spiritual dimension to life and thus it may be of value to them to receive support from a chaplain with a similar perspective.

It has also been noted that students may have general spiritual concerns that they would like to discuss with and informed supportive adult, not with a view to being converted to a particular religious persuasion, but so as to help them form and clarify their own views.

In an opinion piece published on July 4, 2014, in The New Daily, Peter James, a spokesperson for the National School Chaplaincy Association, stated, 'Spirituality is an explicit part of the program – not teaching theology and not converting students – but being a well-trained, non-judgemental, non-coercive support to students as they pull together the various facets of their lives in meaningful ways. This requires appropriate parental and student consents.'

The National School Chaplaincy Association has stated in relation to spiritual guidance that the chaplain's role is 'Supporting students who wish to explore their spirituality [and] providing guidance on religious, values and ethical matters'.

4. All one-on-one interaction between students and a chaplain require parental consent and willing student participation. The whole school community needs to have been involved in the decision to apply for a federally-funded school chaplain; therefore, in terms of the general support services supplied by this chaplain, the consent of the broader school community is assumed.

The Program Guidelines and Code of Conduct for the National School Chaplaincy program state that 'Participation in the Program is voluntary and school communities will have supported successful applications. School communities will

have also determined the role and the choice of school chaplain/student welfare worker. Therefore general school chaplain/student welfare worker interaction within the school does not require mandatory opt-in arrangements.' More specific consent is required for one-on-one interaction between the chaplain and individual students. The Program Guidelines and Code of Conduct for the National School Chaplaincy program note that 'The Department recommends that arrangements include consent forms for prearranged one on one appointments/sessions and ongoing assistance from the school chaplain/student welfare worker, particularly where there is religious or spiritual content or where the activities require professional expertise such as counselling.'

5. It seems likely that funding provisions can be made to allow government-supported chaplains to continue to work in Australian schools

Two recent High Court decisions have directed that the federal government does not have the power to directly fund school chaplaincy programs. Supporters of the program that this decision does not represent a criticism of the work done within the program, nor concern over the potential for Church-based personnel to influence a secular education system.

The High Court's two decisions have been entirely procedural, that is, they have each been judgements that the Constitution does not give the federal government authority to fund particular on-going programs.

In an opinion piece published on July 4, 2014, in The New Daily, Peter James, a spokesperson for the National School Chaplaincy Association, stated, 'For the six sitting justices, this case was a small point of law, limited only to the school chaplaincy program: can the Commonwealth authorise direct spending for a program of support in schools – direct spending, rather than through grants to the states? The court ruled out direct spending.

But the court also said "it may be accepted some students would derive advantage" from using the services of a school chaplain. They said "it may be assumed ... chaplaincy services at a school will help some students."

The Abbott government has indicated its intention to investigate alternate methods of financing the National School Chaplaincy Program. The terms of the most recent High Court ruling would seem to suggest that grants to the states to fund the program may be a constitutionally valid solution.

Further implications

It needs to be noted that in terms of the functions designated for them, school chaplains appear to have provided an effective service.

The following observations are taken from an evaluation of the school chaplaincy program conducted in 2009 by Dr Philip Hughes of Edith Cowan University and Professor Margaret Sims of the University of New England.

NOTE re potential bias: the following research was commissioned by the National School Chaplaincy Association.

The full text of this evaluation can be accessed at http://schoolchaplaincy.org.au/files/2012/09 /chaplaincyeffectiveness.pdf

'The Chaplains and Their Work

A high proportion of chaplains are male (41%) compared with teachers (26%) and health and welfare support workers (29%). Many chaplains are young with 28 per cent being under 30 years of age and only 23 per cent 50 years of age or older. Many bring to the job experience in youth or children's work or church associated work. Twenty-one per cent have been teachers and 15 per cent are professionally trained counsellors.

The major part of the work of chaplains is pastoral care of students. Much of this takes place in personal interactions with students, sometimes in casual contexts such as in the playground, but sometimes in a more structured way in the chaplain's office.

In terms of the division of time, the average proportion of time for all chaplains is as follows.

30% informal or structured pastoral care of students;

19% classroom activities and needs-based programs, for example behaviour management;

7% informal school activities such as breakfast programs;

9% the pastoral care of families and staff;

8% school events, camps and crises;

8% with welfare staff and connecting with agencies in the referral of students;

% networking and fund-raising; and

11% professional development, administrative work and miscellaneous activities.

In the past year,

82% had run needs-based programs such as handling grief or behaviour management;

79% of chaplains said they had made off-site visits to parents and care-givers;

73% had led in school events or special ceremonies; and

49% had participated in school camps...

Chaplains deal with a wide range of issues, but most frequently with behaviour management and social relationship issues such as anger, peer relationships, loneliness and bullying. Family relationship issues are also commonly

discussed with chaplains. A second group of issues has to do with the development of the self: sense of purpose, self-esteem, and mental health. A third group of issues is the involvement of students in the community: issues of social inclusion and racism. In many places, chaplains work to integrate Aboriginal students and immigrant groups into the school community. Many chaplains are involved in the support of students "at risk"...

Overall, it was found that chaplains had undertaken the activities expected of them in terms of contributing to the provision of pastoral care very effectively. They had provided guidance on human relationships and provided support for students and staff in cases of bereavement, family breakdown and other crisis and loss situations. Their contribution was widely appreciated. Chaplains had also provided support for students in exploring their spirituality and had provided guidance on religious, values and ethical matters (although the extent to which this had occurred varied somewhat depending on the extent to which some support and guidance was requested).'

The evaluation did not address the question of whether secular provision of these services would have been more effective. This makes it very difficult to make a definitive judgement about the appropriateness of federal funding of the National School Chaplaincy Program. If it were demonstrated that greater benefits could be achieved through secular provision then the current funding arrangements would have to be judged inappropriate.

Newspaper items used in the compilation of this issue outline

The Australian: May 7, 2014, page 7, news item by Jared Owens, `Doubt cast on chaplain funding'. http://www.theaustralian.com.au/national-affairs/state-politics/doubt-cast-on-chaplain-funding/story-e6frgczx-1226907966190?nk=2d841a5e59bbe544d7b577e194dc3757

The Age: May 15, 2014, page 7, news item by Daniella Miletic, `Chaplaincy funds "should be used" for disabled students'.

 $\frac{\text{http://newsstore.smh.com.au/apps/viewDocument.ac;jsessionid=553754660E34D72283B020376FE74740?sy=afr\&pb=all_ffx\&dt=selectRange\&dr=1month\&so=relevance\&sf=text\&sf=headline\&rc=10\&rm=200\&sp=brs\&cls=540\&clsPage=1\&doclD=AGE140515DT4AE5B0T1N}$

The Australian: May 14, 2014, page 7, news item by Justine Ferrari, `Top spending outlay offers \$245m for religious advisers in schools'.

 $\underline{http://www.theaustralian.com.au/national-affairs/budget-2014/top-spending-outlay-offers-245m-for-religious-advisers-in-schools/story-fnmbxsc8-1226916655977$

The Age: May 29, 2014, page 13, news item by Preiss and Butler, 'Schools to lose secular welfare staff'. http://www.smh.com.au/federal-politics/political-news/schools-to-lose-secular-welfare-staff-under-christian-chaplaincy-drive-20140528-394sk.html

The Age: June 1, 2014, page 2, news item by Michael Lallo, `"Jesus is a person, not a swear word"'. http://www.theage.com.au/national/jesus-is-a-person-not-just-a-swear-word-video-promotes-chaplains-in-schools-funding-20140531-39b3n.html

The Age: June 8, 2014, page 4, news item by J Stark, `Chaplain plan: gay pupils at risk' (ref to counselling and discrimination against homosexuals).

http://newsstore.fairfax.com.au/apps/viewDocument.ac;jsessionid=57354A78F56021803323626416FAD247?sy=afr&pb=all_ffx&dt=selectRange&dr=1month&so=relevance&sf=text&sf=headline&rc=10&rm=200&sp=brs&cls=175&clsPage=1&docID=SAG140608H44H076S64A

The Age: June 21, 2014, page 32, letters incl, `If you want religion, then go to church / Students deserve a professional approach'.

http://www.theage.com.au/comment/the-age-letters/if-you-want-religion-then-go-to-church-20140620-3ajmf.html

The Age: June 21, 2014, page 3, news item (photo) by Jewel Topsfield, `Showdown over chaplains in schools'. http://www.smh.com.au/federal-politics/showdown-looms-over-chaplains-in-schools-20140620-zsgni.html

The Australian: June 20, 2014, page 3, news item by Nicola Berkovic, `Schools chaplain funding "invalid". http://m.theaustralian.com.au/national-affairs/schools-chaplain-funding-invalid-says-high-court/story-fn59niix-1226960512062?nk=2d841a5e59bbe54dd7b577e194dc3757

The Age: June 20, 2014, page 8, news item by Jane Lee et al, `Parent wins battle on funding of chaplains' <a href="http://newsstore.fairfax.com.au/apps/viewDocument.ac;jsessionid=2141B509FEE8BCC3355040B92B719701?sy=afr&pb=all_ffx&dt=selectRange&dr=1month&so=relevance&sf=text&sf=headline&rc=10&rm=200&sp=brs&cls=116&clsPage=1&docID=AGE140620F195Q77DK1N

(with photo of Ron Williams and background item, `Throwing book at religious study'). http://newsstore.fairfax.com.au/apps/viewDocument.ac;jsessionid=2141B509FEE8BCC3355040B92B719701?sy=afr&

 $\label{eq:pb-all_ffx} $$ $$ pb-all_ffx dt-selectRange dr=1month so=relevance sf=text sf=head line src=10 drm=200 drm$