

# Religious discrimination in the recruitment of National Student Wellbeing Program workers in Australian public schools

A Report by the Rationalist Society of Australia

August 2023

## Part 1: Introduction

### The National Student Wellbeing Program

The National Student Wellbeing Program (NSWP) exists under a [Federation Funding Agreement](#) between the Commonwealth, New South Wales, Victoria, Queensland, Western Australia, South Australia, the Northern Territory, and the Australian Capital Territory. Commencing in 2023, the Commonwealth will provide almost \$310 million over five years to the States and Territories to fund the operation of the NSWP.

The NSWP Agreement is available online:

<https://federalfinancialrelations.gov.au/agreements/national-student-wellbeing-program>.

The purpose of the NSWP is to support the provision of:

- “pastoral care services”, defined to mean “the practice of supporting the general wellbeing of students and the school community”, and
- “strategies developed in consultation with the school community, relevant school staff and school principal, that support the wellbeing of the broader school community, for example: coordinating volunteering activities and breakfast clubs, lunch time activities, excursions, school incursions, and parent/carer workshops.”

The NSWP Agreement contemplates two categories of NSWP worker: chaplains and student wellbeing officers. There is no difference in the work performed by the two categories of NSWP worker. The NSWP Agreement indicates that the tasks performed by both categories of NSWP worker are identical and that both categories of NSWP worker must have the same basic qualifications. The only difference between the two categories of NSWP worker is that the NSWP Agreement requires that chaplains be “recognised through endorsement by a recognised or accepted religious institution”. The rationale for this requirement is not stated in the NSWP Agreement.

The NSWP Agreement emphasises that “the NSWP is not a religious program and does not provide religious instruction or religious counselling to students.”

The NSWP operates in public, Catholic and independent schools. The focus of this report is the operation of the NSWP in public schools.

### Religious discrimination in the recruitment of NSWP workers

NSWP workers are not employed directly by schools (or education departments). They are engaged through outsourcing arrangements with schools entering into contracts with third party provider organisations, which hire NSWP workers. As detailed in Part 2 of this report, standard practice is that third party provider organisations will only hire NSWP workers who are Christian to work in public schools.

Religious discrimination against job applicants is prohibited by the anti-discrimination legislation of all States and Territories, except in New South Wales and South Australia. Because

the NSWP operates in public schools and “is not a religious program” the limited exceptions to those prohibitions for religious workers within religious organisations would appear not to apply.

State anti-discrimination commissioners have indicated that the hiring practices that are used for recruiting NSWP workers are legally problematic. The same outsourcing mechanism was used in the former National School Chaplaincy Program and attracted criticism from State anti-discrimination commissioners:

- In 2020, Victoria’s Equal Opportunity and Human Rights Commission [told](#) a Victorian MP: “we agree that the program may be in breach of [Victoria’s] *Equal Opportunity Act 2010*”.
- In 2020, Queensland’s Human Rights Commissioner [said](#) the practice involved “potential contraventions of the [Qld *Anti-Discrimination*] Act”.
- In 2021, Western Australia’s Equal Opportunity Commission [said](#) it was concerned that restricting youth worker/chaplain positions to religious people was “prima facie religious conviction discrimination” under Western Australia’s *Equal Opportunity Act 1984*.

The new NSWP Agreement itself appears to prohibit religious discrimination in the recruitment of NSWP workers. The NSWP Agreement provides that the States and Territories are responsible for “putting in place appropriate processes to ensure that: ... (ii) chaplains and student wellbeing officers may be of any faith or of no faith”. This obligation appears incongruent with the NSWP Agreement also providing that chaplains must be endorsed by a faith group.

This report provides an overview of the extent to which religious discrimination in the recruitment of NSWP workers exists in the NSWP as it operates in public schools in each jurisdiction. Part 2 of this report shows that religious discrimination against NSWP workers is a systemic feature of the operation of the new NSWP in Australian public schools.

## Methodology

The overview presented in Part 2 of this report adopted the following methodology:

- *Step 1: Identifying NSWP provider organisations:* The list of approved NSWP third party provider organisations was sourced from the website of each jurisdiction’s education department. The two exceptions to this approach were Victoria and Tasmania. Neither State’s education department (currently) publishes a list of NSWP third party providers. Instead, an incomplete list was compiled from internet searches identifying organisations claiming to be NSWP third party providers/advertising NSWP roles for Victorian and Tasmanian government schools.
- *Step 2: Identifying the selection criteria actually used to hire NSWP workers:* The hiring rules for each NSWP third party provider organisation were sourced from those organisations’ websites or advertisements they had posted on job search websites. Footnotes with links to sources are provided for all providers whose rules are considered.

## Part 2: Overview of NSW worker selection criteria

### New South Wales overview

The NSW Department of Education has [published a list](#) of 290 public schools and their National Student Wellbeing Program providers as at 14 June 2023.

<b>Provider</b>	<b>Has contracts with the following number of NSW public schools:</b>	<b>Has restrictive hiring policies as follows:</b>
Generate Services	138	Applicants must be a “Committed Christian” and “Attend a local faith community” <sup>1</sup> . “SU Australia (Generate) requires employees to have a commitment to Christian faith”. <sup>2</sup>
Your Dream	93	Applicants require an “Endorsement letter from local church group” <sup>3</sup>
Tamworth Chaplains Board	9	No information found. Does not appear to have a website.
Macquarie Life Church	8	“School chaplaincy fulfills the vision of Macquarie Care of ‘connecting with kindness’ while planting seeds for the greater vision of Macquarie Life Church to bring people ‘Towards Christ.’” <sup>4</sup>
GWFC Chaplaincy	7	“At GWFC, we partner with local churches to provide chaplains for local schools. This means that our chaplains already have a strong connection to the community and a network of support from within their local church.” <sup>5</sup>
Fusion Australia	5	NSWP worker selection criteria not located on organisation’s website.
Nepean Community &	3	NSWP worker selection criteria not

<sup>1</sup> <https://generate.org.au/positions/> (accessed 13 August 2023).

<sup>2</sup> <https://generate.org.au/chaplaincy/#qualifications> (accessed 13 August 2023).

<sup>3</sup> [https://yourdream.au/wp-content/uploads/2023/03/NewApplicant\\_FAQ\\_2023-2.pdf](https://yourdream.au/wp-content/uploads/2023/03/NewApplicant_FAQ_2023-2.pdf) (accessed 13 August 2023).

<sup>4</sup> <https://www.macquarielifechurch.com.au/s/School-Chaplain-Handbook-2022-2.docx> (accessed 13 August 2023).

<sup>5</sup> <https://www.gwfcchaplaincy.au/chaplaincy-blog/why-gwfc-chaplaincy-is-the-best-choice-for-schools> (accessed 13 August 2023).

Neighbourhood Services		located on organisation's website.
Power to Change	3	NSWP worker selection criteria not located on organisation's website.
STARTTS	3	NSWP worker selection criteria not located on organisation's website.
Strong Nation Community Services	2	NSWP worker selection criteria not located on organisation's website.
2Connect Youth & Community	1	NSWP worker selection criteria not located on organisation's website.
3Bridges Community Youth Zone	1	"3Bridges Community is committed to enabling a culture of inclusion and diversity, and to the principle of equal employment opportunity for all. The people we work with and provide support to, come from all walks of life and so do we. We welcome your unique contributions through your experiences, culture, opinions, ethnicity, gender identity and all that makes you an individual." <sup>6</sup>
Albert Park PS P&C Association	1	No information found. Organisation does not appear to have a website.
Anglican Church of Australia Wee Waa	1	NSWP worker selection criteria not located on organisation's website.
Anglican Diocese of Bathurst	1	NSWP worker selection criteria not located on organisation's website.
Big Heart Big Vision	1	NSWP worker selection criteria not located on organisation's website.
Bridging the Gap Sydney West	1	NSWP worker selection criteria not located on organisation's website.
Christian City Church Kingscliff	1	NSWP worker selection criteria not located on organisation's website.
Community Activities Lake Macquarie	1	NSWP worker selection criteria not located on organisation's website.
Emmaville P&C Association	1	No information found. Organisation does not appear to have a website.
Evans River K-12 School P&C Association	1	No information found. Organisation does not appear to have a website.

<sup>6</sup> <https://3bridges.bamboohr.com/careers/283> (accessed 14 August 2023).

Fresh Hope Engage	1	Applicants need “To be endorsed as Ministering Person with Churches of Christ in NSW or a willingness to undertake endorsement;” and “High spiritual integrity and a heart to serve in Gods Kingdom.” <sup>7</sup>
Great Lakes Education Christian Care Association	1	No information found. Organisation does not appear to have a website.
Life Resources Centre	1	No information found. Organisation does not appear to have a website.
Raymond Terrace Christian Education Association	1	“Applicants should be committed Christians and be in good standing with their church.” <sup>8</sup>
Reaching the Nations Christian Church	1	No information found. Organisation does not appear to have a website.
Religious Education Association of Lismore Inc	1	No information found. Organisation’s website does not appear to be active.
Tumut School Chaplaincy Services Inc	1	No information found. Organisation does not appear to have a website.

<sup>7</sup> <https://freshhope.csod.com/ux/ats/careersite/1/home/requisition/144?c=freshhope> (accessed 14 August 2023).

<sup>8</sup> <https://www.christianjobs.com.au/jobs/242797730-school-chaplain-at-raymond-terrace-christian-education-association> (accessed 14 August 2023).

## Victoria overview

The Victorian Department of Education does not (currently) publish a list of schools participating in the NSWP and does not (currently) publish a list of NSWP third party provider organisations. The Department’s [website](#) states: “The list of NSWP providers is currently being finalised.”

The following likely incomplete list of Victorian NSWP third party provider organisations was compiled from internet searches identifying organisations claiming to be NSWP third party providers/advertising NSWP roles for Victorian government schools.

<b>Provider</b>	<b>Has restrictive hiring policies as follows:</b>
Scripture Union Vic <sup>9</sup>	The online application form requires applicants to list their “Current Church/ Faith Community“ and list a referee who is “a minister/ church leader”. The online application form also requires applicants to answer the questions “What is your understanding of being Christian?” and “Briefly describe your faith journey” <sup>10</sup>
Korus Connect <sup>11</sup>	“Korus Connect requires applicants provide at least one satisfactory reference from a Minister, Priest, Pastor or Leader from the Christian Community with which they are currently involved which adheres to at least one of the three ecumenical creeds.” <sup>12</sup>

---

<sup>9</sup> “SU's chaplaincy and school programs run in over 50 schools around Victoria.”:  
<https://www.suvc.org.au/schools> (accessed 13 August 2023).

<sup>10</sup> <https://www.suvc.org.au/forms/chaplaincy-application-form> (accessed 13 August 2023).

<sup>11</sup> “School Chaplains help build communities that are connected, supported and whole; they offer comprehensive pastoral care to school communities across Victoria.”:  
<https://www.korusconnect.org.au/initiatives> (accessed 13 August 2023).

<sup>12</sup> <https://www.korusconnect.org.au/work> (accessed 13 August 2023).

## Queensland overview

The Queensland Department of Education website provides a [list](#) of the 724 state schools receiving funding under the NSWSP in 2023. The Department publishes a [list](#) of NSWSP providers (referred to as “accredited employing authorities”) but not does not publish details of how many schools each provider has contracts with.

<b>Provider</b>	<b>Has restrictive hiring policies as follows:</b>
SU Australia Ministries Ltd	“Chaplains are inspired by their Christian faith to serve those in need. They aim to model the love and compassion of Jesus Christ as they serve in schools.” <sup>13</sup>
YFS Ltd	“We respect each other’s backgrounds, perspectives and life experiences.” “We accommodate the cultural and religious needs of our diverse staff.” <sup>14</sup>
Your Dream School Programs	Applicants require an “Endorsement letter from local church group” <sup>15</sup>
The Cage Youth Foundation	NSWP worker selection criteria not located on organisation’s website.
Young Life Australia	“All staff and volunteers profess and exhibit a personal relationship in Jesus, and uphold His life and values – witnessing the whole gospel of Jesus Christ- through their words and actions.” <sup>16</sup>
Fourth Quadrant Foundation Pty Ltd	NSWP worker selection criteria not located on organisation’s website.
YUMI Education	NSWP worker selection criteria not located on organisation’s website.
Inspire Youth and Family Services Inc (Inala Youth Service)	NSWP worker selection criteria not located on organisation’s website.
ICYS Ipswich Community Youth Service Inc	NSWP worker selection criteria not located on organisation’s website.
Association of Women Educators Inc	NSWP worker selection criteria not located on organisation’s website.
Community Living Association Inc	NSWP worker selection criteria not located on organisation’s website.

<sup>13</sup> <https://www.suqld.org.au/about/faq/> (accessed 13 August 2023).

<sup>14</sup> <https://www.yfs.org.au/a-great-place-to-belong/> (accessed 14 August 2023).

<sup>15</sup> [https://yourdream.au/wp-content/uploads/2023/03/NewApplicant\\_FAQ\\_2023-2.pdf](https://yourdream.au/wp-content/uploads/2023/03/NewApplicant_FAQ_2023-2.pdf) (accessed 13 August 2023).

<sup>16</sup> <https://younglife.org.au/about-us/> (accessed 14 August 2023).



Jabiru Community Youth & Children's Services	NSWP worker selection criteria do not include any religious requirements. <sup>17</sup>
Church@theGabba	NSWP worker selection criteria not located on organisation's website.
Queensland Police Citizens Youth Welfare Association	NSWP worker selection criteria not located on organisation's website.
South Burnett CTC Inc	NSWP worker selection criteria not located on organisation's website.
Vocational Partnerships Group Inc	NSWP worker selection criteria not located on organisation's website.

---

<sup>17</sup> [https://jabiru.org.au/wp-content/uploads/Jabiru\\_StudentWellbeingWorkersFlyerAug22\\_web.pdf](https://jabiru.org.au/wp-content/uploads/Jabiru_StudentWellbeingWorkersFlyerAug22_web.pdf) (accessed 14 August 2023).

### Western Australia overview

The Western Australia Department of Education website publishes a [list](#) of the 247 public schools (as at February 2023) receiving funding under the NSW in 2023. The Department publishes a [list](#) of NSW providers (referred to as “service providers”) but not does not publish details of how many schools each provider has contracts with.

<b>Provider</b>	<b>Has restrictive hiring policies as follows:</b>
Albany Youth Support Association (AYSA)	Does not appear to hire based on religious considerations.
Anglicare WA	NSW worker selection criteria not located on organisation’s website.
Choyces	NSW worker selection criteria not located on organisation’s website.
onPsych	Does not hire based on religious considerations.
SU Australia	<p>“A chaplain will, therefore, be a person whose beliefs and lifestyle reflect a biblical understanding of, and a commitment to the teachings, life and person of, Jesus Christ.”<sup>18</sup></p> <p>“SU requires that the Chaplain:</p> <ul style="list-style-type: none"> <li>● subscribe to one or both of the creeds of the Christian church (Apostles’ Creed and/or Nicene Creed)</li> <li>● demonstrate a living and personal relationship with Jesus Christ</li> <li>● demonstrate strong Christian character evidenced by servant leadership, valuing of people in general and marginalised people in particular</li> <li>● be a respected member of a local Christian church that we recognize”<sup>19</sup></li> </ul>
YouthCARE	<p>“Job Category: Religious Worker”</p> <p>“Reporting to the YouthCARE Area Chaplain, the School Chaplain is a sensitive Christian presence in educational communities”</p> <p>Applicants must have “A demonstrated capacity to sensitively relate the Christian faith in a secular context”</p> <p>Applicants must have “Demonstrated active engagement in the life of a Christian Church that is aligned with YouthCARE’s Statement of Faith”<sup>20</sup></p>

<sup>18</sup> <https://www.suwa.org.au/schools/chaplaincy/> (accessed 13 August 2023).

<sup>19</sup> <https://www.suwa.org.au/wp-content/uploads/2019/10/Chaplaincy-Role-Statement.pdf> (accessed 13 August 2023).

<sup>20</sup> <https://yc-console.s3.ap-southeast-2.amazonaws.com/yKbT5uzqqfPK9Ho4rRVhhSvB?response-content->

### South Australia overview

The South Australia Department for Education has [published a list](#) of 356 government schools and their National Student Wellbeing Program providers for 2023.

<b>Provider</b>	<b>Has contracts with the following number of SA government schools:</b>	<b>Has restrictive hiring policies as follows:</b>
Schools Ministry Group	312	Applicants require: “a personal commitment to Christian faith and values and able to give adherence to the beliefs held in common by the supporting churches, as stated in the Nicene Creed” Applicants require “active and regular involvement in a Christian Community” <sup>21</sup>
Uniting Country SA	16	“We celebrate diversity and welcome all people regardless of lifestyle choices, ethnicity, faith, sexual orientation and gender identity.” <sup>22</sup>
Your Dream Inc	28	Applicants require an “Endorsement letter from local church group” <sup>23</sup>

---

[disposition=inline%3B%20filename%3D%22JD\\_School%20Chaplain\\_2023.pdf%22%3B%20filenam](#)  
[e%2A%3DUTF-8%27%27JD\\_School%2520Chaplain\\_2023.pdf&response-content-](#)  
[type=application%2Fpdf&X-Amz-Algorithm=AWS4-HMAC-SHA256&X-Amz-](#)  
[Credential=AKIATBMZXJ6FEFBB444Z%2F20230813%2Fap-southeast-](#)  
[2%2Fs3%2Faws4\\_request&X-Amz-Date=20230813T025238Z&X-Amz-Expires=300&X-Amz-](#)  
[SignedHeaders=host&X-Amz-](#)  
[Signature=2f5317a801768381adfd014bcd0708026000cea078817ce27ff8919955411c5](#) (accessed 13 August 2023).

<sup>21</sup>

<https://static1.squarespace.com/static/54ab222ce4b03d35acd7377c/t/6392973422050555e73dd3fa/1670551349077/4.+Job+%26+Person+Specification.pdf> (accessed 13 August 2023).

<sup>22</sup> <https://www.uksa.org.au/Pages/FAQs/Category/join-us> (accessed 13 August 2023).

<sup>23</sup> [https://yourdream.au/wp-content/uploads/2023/03/NewApplicant\\_FAQ\\_2023-2.pdf](https://yourdream.au/wp-content/uploads/2023/03/NewApplicant_FAQ_2023-2.pdf) (accessed 13 August 2023).

### Tasmania overview

The Tasmanian Department for Education, Children and Young People does not (currently) publish a list of schools participating in the NSWSP in 2023 and does not (currently) publish a list of NSWSP third party provider organisations in 2023. The Department’s [website](#) provides a list of schools participating during 2022 in the former National School Chaplaincy Program (NSCP) and a [list](#) of NSCP third party provider organisations.

The following likely incomplete list of Tasmanian NSWSP third party provider organisations was compiled from internet searches identifying organisations claiming to be NSWSP third party providers/advertising NSWSP roles for Tasmanian government schools

Provider	Has restrictive hiring policies as follows:
Scripture Union Tasmania <sup>24</sup>	“SU Tas Chaplains need to be: <ul style="list-style-type: none"><li data-bbox="639 815 1337 875">• Committed Christians who are actively involved in a local Christian church”<sup>25</sup></li></ul> Applicants must “be actively involved in a Christian community.” <sup>26</sup>

---

<sup>24</sup> “School Chaplaincy in Tasmania. SU Australia employs chaplains in many primary and secondary schools across the state.”: <https://sutas.org.au/school-chaplaincy/> (accessed 13 August 2023).

<sup>25</sup> <https://sutas.org.au/school-chaplaincy/faqs/> (accessed 13 August 2023).

<sup>26</sup> <https://sutas.org.au/school-chaplaincy/vacancies/> (accessed 13 August 2023).

### Northern Territory overview

The Northern Territory Department of Education has published a [list](#) of 12 government schools participating in the NSW in 2023. The Department has not published a list of approved NSW third party provider organisations.

The following likely incomplete list of Northern Territory NSW third party provider organisations was compiled from internet searches identifying organisations claiming to be NSW third party providers/advertising NSW roles for Northern Territory government schools.

<b>Provider</b>	<b>Has restrictive hiring policies as follows:</b>
Scripture Union NT <sup>27</sup>	Applicants will have “Mature personal faith and values consistent with SU’s ethos” <sup>28</sup>  “You also need to be able to agree to abide by SU’s Aims, Beliefs and Working Principles.” <sup>29</sup> These include: “We encourage children to follow Christ in ways that are appropriate to their age, culture and background”. <sup>30</sup>

---

<sup>27</sup> “SU Australia is a Christian organisation and approved school chaplaincy provider in the NT. We provide chaplains in numerous schools across the Northern Territory.”: <https://sunt.org.au/ministry-and-programs/chaplaincy/> (accessed 13 August 2023).

<sup>28</sup> <https://sunt.org.au/ministry-and-programs/chaplaincy/> (accessed 13 August 2023).

<sup>29</sup> <https://sunt.org.au/ministry-and-programs/chaplaincy/> (accessed 13 August 2023).

<sup>30</sup> [https://mcusercontent.com/e8191526a42bb392536bf9733/files/02docfa7-9f77-4a2d-aaco-eb74af183470/SU\\_Aims\\_Beliefs\\_and\\_Working\\_Principles\\_2\\_pages.01.pdf](https://mcusercontent.com/e8191526a42bb392536bf9733/files/02docfa7-9f77-4a2d-aaco-eb74af183470/SU_Aims_Beliefs_and_Working_Principles_2_pages.01.pdf) (accessed 13 August 2023).

### Australian Capital Territory overview

The Australian Capital Territory Education Directorate website does not appear to provide information about the National Student Wellbeing Program, although the ACT is a party to the NSW Agreement.

The following likely incomplete list of ACT NSW third party provider organisations was compiled from internet searches identifying organisations claiming to be NSW third party providers/advertising NSW roles for ACT government schools.

<b>Provider</b>	<b>Has restrictive hiring policies as follows:</b>
Scripture Union ACT (School Chaplaincy ACT) <sup>31</sup>	“Chaplains are inspired by their Christian faith to serve those in need. They aim to model the love and compassion of Jesus Christ as they serve in schools.” <sup>32</sup>

---

<sup>31</sup> “School Chaplaincy ACT is the Territory’s largest provider of chaplains in schools, placing chaplains in 20 ACT Government schools and reaching more than 8,000 students. School Chaplaincy ACT is operated by SU Queensland at the invitation of SU ACT.”: <https://suact.org.au/chaplaincy/> (accessed 13 August 2023).

<sup>32</sup> <https://www.suqld.org.au/about/faq/> (accessed 13 August 2023).