



Special Religious Education Compliance Report

Including

Annual Assurance Audits

Audits of curricula information online

4 May 2018

Fairness in Religions in School (FIRIS)

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1 Key to Abbreviations and Terms

Abbreviations and terms used throughout this report include:

the Act	the <i>NSW Education Act 1990</i>
AA	Annual Assurance
AMAs	Alternative Meaningful Activities (also known as ‘non-scripture’ in NSW Government schools)
the Department	the New South Wales Department of Education
the Minister	the NSW Minister for Education
REP	Religious Education Policy (NSW Department of Education)
REIPs	Religious Education Implementation Procedures (NSW Department of Education)
SEE	Special Education in Ethics (also known as ‘ethics’)
SRE	Special Religious Education (also known as ‘scripture’)
SREP	Special Religious Education Procedures (currently scheduled for implementation in January 2019)

2 Executive Summary

The provisions for Special Religious Education (SRE, aka 'scripture') in the *NSW Education Act 1990* establish a self-regulating system involving a multitude of organisations. Once approval to provide SRE in NSW Government schools is granted to a religious organisation, the NSW Minister for Education has no authority over the selection and authorisation of individual SRE instructors, the content of SRE curricula, or the pedagogical methods used.

A review of SRE (and Special Education in Ethics; SEE, aka 'ethics') conducted by ARTD Consultants from December 2014 to December 2015 (the ARTD Review) noted:

A closely related responsibility under self-regulation is transparency to parents, the Department, school communities and the wider public, through publication of important information and the provision of regular monitoring. (ARTD Final Report, p. 34)

SRE providers are required to submit a written Annual Assurance to the Department of Education that:

- they have procedures to ensure compliance with the *Child Protection (Working with Children) Act 2012* and have evidence that personnel approved to teach special religious education in public schools have obtained a NSW Working with Children Check (WWCC) clearance prior to commencement of duties and copies of the clearances are kept on record.
- only authorised materials and pedagogy will be used, taught sensitively and in an age appropriate manner and that a copy of the age appropriate curriculum and/or the curriculum outline used in schools is provided to the public on a website.
- a system of accredited initial and ongoing training for volunteer teachers includes training in classroom management and child protection issues is in place.¹

An audit of the Annual Assurances (AA) submitted to the Department for 2017 and by 18 March 2018 for the 2018 school year, obtained by FIRIS in accordance with the *Government Information (Public Access) Act 2009*, has identified that:

- of the 107 religious organisations included in the Department's list of approved SRE providers in NSW Government schools (17 January 2017):
 - 3 did not submit an AA for the entire 2017 school year yet did not have their approval revoked by the Minister or the Department
 - 23 failed to submit an AA by the due date (27 Jan 2017) and, of these providers, 6 submitted their AA more than five months after the due date

¹ <https://education.nsw.gov.au/teaching-and-learning/curriculum/learning-across-the-curriculum/religion-and-ethics/approved-sre-providers/criteria-for-approval> - last accessed 12.04.2018.

- 8 did not provide a URL identifying the location of their authorised curriculum in the appropriate space provided on the document.
- only 4 provided a URL direct to a curriculum outline / scope and sequence document.
- of the 107 religious organisations included in the Department's list of approved SRE providers in NSW Government schools on 24 January 2018:
 - 27 failed to submit an AA by the due date (29 January 2018)
 - 45, including three who did not provide a URL at all, did not meet the requirement to provide the online location of information regarding child protection training
 - one provider did not enter a URL in the appropriate space provided on the document for a location of their authorised curriculum
 - only four provided a URL direct to a curriculum outline / scope and sequence document

It has been a requirement of the Department's *Religious Education Implementation Procedures* (REIPs) since June 2013 that providers of SRE '*make lesson content accessible on a website or at least provide a program outline and curriculum scope and sequence documents.*'

An audit to determine SRE provider compliance with the requirement to have their curriculum and/or scope and sequence document available on a website, conducted 17 to 18 February 2018, based on the Department's list of approved providers dated 16 February 2018, identified that:

- of the 107 approved providers, 14 allegedly failed to identify or mention the curriculum used by their instructors. Of these 14 alleged non-compliant providers, 12 had not been found compliant in any of FIRIS' four previous audits
- only five of the hyperlinks provided via the Department's online list of approved providers went directly to a provider's webpage containing SRE information only
- of the 92 providers who did at least identify the curriculum used, FIRIS found 65 different curricula were mentioned
- of the 250 links to curricula found on the websites of those 92 providers, only 80 (32%) were directly linked to either a curriculum outline, syllabus outline, or a scope and sequence document.

In consideration of the findings herein - of failures of far-too-many SRE providers to meet the simple requirements of the annual assurance process - FIRIS believes that the NSW public should have little confidence that the NSW Department of Education is overseeing and managing child-protection and safety during SRE as its own procedures and policies require, thus it is not adequately mitigating potential risks of various forms of abuse of NSW public school students.

3 Background

3.1 Legislation, Policies, and Procedures

Special Religious Education (SRE) is “education in the beliefs and practices of an approved religious persuasion”. It is delivered by authorised representatives of approved religious groups to students who have nominated that religion. It is legislated in NSW Government schools under Section 32 of the *NSW Education Act 1990*. There is a Religious Education Policy and Religious Education Implementation Procedures (REIPs) and other support materials.

<https://education.nsw.gov.au/teaching-and-learning/curriculum/learning-across-the-curriculum/religion-and-ethics/about-religion-and-ethics>

3.1.1 Submission of an Annual Assurance

“The Minister for Education must approve a religious persuasion before its specific beliefs and practices are taught in NSW public schools ...

“To keep authorisation current an approved provider must provide the following through a written annual assurance to the department.

- Procedures to ensure compliance with the Child Protection (Working with Children) Act 2012.
- Evidence that personnel approved to teach special religious education in public schools have obtained a NSW working with children check (WWCC) clearance prior to commencement of duties and copies of the clearances are kept on record.
- Only authorised materials and pedagogy will be used, taught sensitively and in an age appropriate manner.
- A copy of the age appropriate curriculum and/or the curriculum outline used in schools is provided to the public on a website.
- A system of accredited initial and ongoing training for volunteer teachers includes training in classroom management and child protection issues is in place.”

<https://education.nsw.gov.au/teaching-and-learning/curriculum/learning-across-the-curriculum/religion-and-ethics/approved-sre-providers/criteria-for-approval>

The REIPs state:

It is the responsibility of an approved provider to...provide an annual assurance to the NSW Department of Education that authorised teachers are only using materials and pedagogy authorised by the provider. [p. 6]

The instructions for the completion of the *Annual Assurance of Providers of Special Religious Education* for both 2017 and 2018 (see **Appendices 1 and 2**) also state that return of the document with the required assurances will ensure that the Minister will continue to grant approval to provide SRE in NSW Government schools for the relevant year.

The Annual Assurance for 2018 added the statement:

Approved providers will lose their approved provider status if the responsibilities outlined in the annual assurance are not addressed.

3.1.1.1 Authorisation of SRE instructors

SRE providers are responsible for selecting, authorising and training individuals as SRE instructors (also known as 'SRE teachers' or 'scripture teachers').

3.1.2 Child protection

It is the responsibility of providers to:

- ensure that each SRE instructor has obtained the relevant clearance required to work with children and for each provider to verify that clearance prior to the instructor starting to deliver SRE. [AA, p. 1]
- keep records of the instructor's WWCC Clearance and verification. [AA, p. 1]
- have in place a system of authorised initial and ongoing training for their volunteer teachers that includes training in child protection and classroom management issues and to have information published on their website. [AA, p. 2]
- annually provide to the Department, a written assurance that they have procedures in place to ensure compliance with the requirements of the *Child Protection (Working with Children) Act 2012*. [REIPs, p. 5]

Commencing in 2018, providers are required to declare:

That the provider has in place a system of authorised initial and ongoing training for their teachers that includes training in classroom management and child protection. The information can be found on the providers website at:

<http://>

4 Audit of Annual Assurances

4.1 FIRIS request for access to information

On 5 February 2018, FIRIS wrote to the Department's Information Access Unit to request copies of every written Annual Assurance submitted to the NSW Department of Education by special religious education (SRE) provider for the 2017 and 2018 school years, in accordance with the *Government Information (Public Access) Act 2009*.

On 22 February 2018 FIRIS was informed that some providers had not lodged their AA for the 2018 school year. FIRIS amended its application to request the AAs for the 2018 school year lodged by the due date, 29 January 2018 (but GIPA-18-035 ended up including 11 AAs lodged after that due date but before the date that Ms Jane Simmons, (Executive Director, School Services) resolved to release the information, 18 March 2018).

4.1.1 GIPA-18-035

GIPA-18-035 contained the following information:

i. 104 AAs for the 2017 school year lodged by 102 providers

note: Two separate AAs were provided for 2017 by each of two providers:

- Fellowship Baptist Church (Moorebank)

Both dated 27 January 2017. Different curriculum URLs provided for each.

- Presbyterian Reformed Church

AA dated 16 February 2017: Curriculum url: <http://www.youthworks.net>

AA dated 31 July 2017 on 2016 AA template. Curriculum url: <http://www.cepstore.com.au/connect>

ii. 91 AAs for the 2018 school year lodged by the 107 providers

4.2 Annual Assurances for 2017

4.2.1 Due date

The due date for submission of 2017 Annual Assurances (AAs) was 27 January 2017.

4.2.2 Number of providers

On 17 January 2017 there were 107 religious organisations included in the Department's list of approved SRE providers in NSW Government schools.

4.2.3 No evidence of submission

There is no evidence in the GIPA-18-035 documentation that four providers listed as approved providers on 17 January 2017 submitted an AA to the Department for the 2017 school year: Central Life Christian Church; Churches of Christ; Faith Baptist Church, and Vision Christian Fellowship, Fyshwick, ACT. These four churches were still listed as providers on the list of approved sre providers updated on 14 February 2017.

The updated 14 February 2017 list included two new approved providers: Lighthouse Chapel International and Southwest Church of Christ Incorporated. There is no evidence in the information provided as part of GIPA-18-035 that one of these new providers, Southwest Church of Christ Incorporated, submitted an AA for the 2017 school year.

All those five churches who allegedly failed to lodge an AA for the 2017 school year were still listed on the list of approved providers updated on 19 June 2017, but two of these five churches had been excluded from the list of approved providers updated on 31 July 2017: Faith Baptist Church and Central Life Christian Church.

The other three churches – Churches of Christ, Vision Christian Fellowship, and Southwest Church of Christ Inc - remained on the list of approved providers through the rest of 2017 and were still on the list updated on 24 January 2018.

4.2.4 Failure to lodge by due date

Of the 104 AAs for 2018 included in GIPA-18-035, one SRE provider did not record the date of lodgment of their 2017 AA. Of the 103 remaining AAs:

- 80 were lodged by the due date.
- 14 were lodged between 28 January 2017 and 27 February 2017.
- 3 were lodged between 28 February 2017 and 27 March 2017.
- 4 were lodged between 28 June 2017 and 27 July 2017 (**more than 5 months after due date**)
- 2 were lodged between 28 July 2017 and 27 August 2017 (**more than 6 months after due date**)

4.2.5 Failure to identify location of required information online

Of the 104 Annual Assurances for 2017 included in GIPA-18-035, 8 providers did not identify a URL for the location of their authorised curriculum in the appropriate space.

Of the 125 URLs provided in the 104 Annual Assurances -

8	Not functioning (7 April 2018)
22	Website of a third party (excluding curriculum publishers), including <ul style="list-style-type: none"> • Inter-Church Commission on Religious Education in Schools (NSW) Inc. (ICCOREIS) • Generate Ministries • ourSRE • Youthworks • whySRE • Combined arrangements • Websites of other denominations
11	Curriculum publisher's website (more than one curriculum option)
44	Curriculum home page
9	Home page of provider
27	SRE page on provider's website
4	Direct to curriculum outline / scope and sequence

Example of questionable entries in the space provided on the AA include:

- 'Christian Publications and Education from Youthworks'
- '<http://www.armenianchurchsydney.org.au> (currently under reconstruction)'
- 'Others are available upon request'
- 'Godspace and Connect'

4.3 Annual Assurances for 2018

4.3.1 Due date

The due date for the 2018 Annual Assurance (AA) was 29 January 2018.

4.3.2 Number of providers who lodged by the due date

On 24 January 2018 there were 107 religious organisations included in the Department's list of approved SRE providers in NSW Government schools. **Eighty** lodged their AA by the due date and 27 did not. One of these AA submitters, Calvary Chapel (Syd), had been removed from the list of approved SRE providers by 18 March 2018.

Even though FIRIS amended its initial request to only include AAs for 2018 lodged by the due date, GIPA-18-035 included 11 AAs lodged *after* the due date but before the date of the decision to release the information (18 March 2018). These 11 providers were:

- Anglican Diocese of Grafton
- Armenian Apostolic Church of Australia
- Grace Evangelical Church (Newcastle)
- Association of Vineyard Churches (Cabramatta)
- New Life Christian Fellowship Narrabri Inc. (Narrabri)
- Islamic Council of NSW (Greenacre)
- Lutheran Church of Australia, NSW District (Rhodes)
- Wesleyan Methodist Church of Australia
- Greek Orthodox Archdiocese of Australia (Redfern)
- Australian Sikh Association Inc. (Glenwood)
- Uniting Church in Australia (NSW Synod)

4.3.3 No evidence of submission in GIPA-18-035

FIRIS was unable to locate evidence in the GIPA-18-035 documentation that 16 providers had submitted their AA for the 2018 school year before the date of the decision to release the information: 18 March 2018 ie. seven weeks after the due date.

Six of these had been removed from the list of approved SRE providers by 18 April 2018 -

- 2018: Anglican Diocese of Wangaratta had been removed by 16 February;
- Hilltop Church Incorporated removed by 5 March;
- Southside Christian Fellowship Incorporated removed by 20 March; *and*

- Australian Indigenous Ministries, the Presbyterian Church of Eastern Australia, and The Lighthouse Community Inc. (Bronte) were removed by 18 April 2018. The Lighthouse Community Inc. (Bondi) had been added to an updated list of providers on 2nd May.

Eleven providers which had no evidence in GIPA-18-035 for having submitted an AA by 18 March 2018 were -

- Anglican Diocese of Bathurst
- Catholic Diocese of Wilcannia-Forbes
- Coast Evangelical Church (Forster)
- The Saiva Manram (Mays Hill)
- Calvary Chapel (Newcastle)
- Cityview Church Inc (Frenchs Forest)
- Gospel Church (Carrington)
- Lighthouse Chapel International (Holroyd)
- The Lighthouse Community Inc. (Bronte/Bondi)
- Sikh Khalsa Mission Inc. (Quakers Hill)
- JET Australia Foundation (Sutherland)

4.3.4 Information regarding classroom management and child protection training

Of the 91 Annual Assurances for 2018 included in GIPA-18-035, only *46 providers entered a URL meeting the minimum requirements* requested by the Department in the Annual Assurance.

Of the 45 other submitted Annual Assurances:

- 3 did not have a URL entered into the relevant space on the form.
- 7 URLs provided did not function.
- 13 URLs were locations not on the provider's own website,
 - Including <http://www.kidsguardian.nsw.gov.au/>
- 22 URLs were locations where the required information was not found.

It should be noted that each provider's website was not audited as to whether it contained the required information. That said, FIRIS has concerns that this audit could not locate the required information on the websites of 14 of the 91 providers.

Questionable entries include:

- *We provide our own inhouse training.*
- *Hoping to arrange this with local schools in February 2018.*

4.3.5 Information regarding the location of curriculum information online

Of the 91 AAs for 2018 included in GIPA-18-035, *one provider did not enter a URL* to identify the location of their authorised curriculum in the appropriate space provided on the document.

That provider wrote:

“TBA - as this is to be centralised in 2018”

The remaining 90 AAs included 99 URLs for the location of curriculum information online.

10	Not functioning (8 April 2018)
9	Website of a third party (excluding curriculum publishers), including: <ul style="list-style-type: none"> • Inter-Church Commission on Religious Education in Schools (NSW) Inc. (ICCOREIS) • Youthworks • whySRE • Combined arrangements
4	Curriculum publisher’s website (more than one curriculum option), including: <ul style="list-style-type: none"> • Christian Education Publications
31	Curriculum home page, including <ul style="list-style-type: none"> • http://cepconnect.com.au/ • http://cepconnect.com.au/curriculum • http://www.godspace.org.au/home.html • http://www.godspace.org.au/curriculum.html
12	Home page of provider
29	SRE page on provider’s website
4	Direct to curriculum outline / scope and sequence

5 Audit of curricula information online

5.1 The responsibilities of SRE providers

5.1.1 Information about lesson content and age-appropriateness of SRE curricula

The Department's *Religious Education Implementation Procedures* (REIPs) state:

It is the responsibility of an approved [SRE] provider to...make lesson content accessible on a website or at least provide a program outline and curriculum scope and sequence documents. [p. 6]

(All five versions of the REIPs implemented since a major revision in June 2013 have contained this statement.)

The *SRE and SEE fact sheet*² states:

Providers must publish age-appropriate curriculum on their website. [p. 2]

The *Application to become an approved provider of SRE teachers in NSW Government schools* (Version updated December 2016) contains the requirement:

Provide details of where the curriculum scope and sequence is available online.

5.1.1.1 Online location of information about lesson content and assurance of age-appropriateness of SRE curricula

The instructions for the completion of the AAs for both 2017 and 2018 state that approved providers are required to provide online access to their authorised age-appropriate curriculum and/or curriculum outline and provide a website link to where this can be found.

Providers are required to provide a declaration:

That an outline of the authorised age appropriate curriculum/s used in schools is/are provided to the public via a website, and the special religious education teachers are teaching the curriculum with sensitivity and in an age appropriate manner. The curriculum/s can be found at:

<http://>_____

² The current *SRE and SEE Fact Sheet* can be downloaded from <https://education.nsw.gov.au/teaching-and-learning/curriculum/learning-across-the-curriculum/religion-and-ethics/support-materials>

5.1.1.2 Authorisation of SRE curricula

The Crown Solicitor has advised the NSW Minister for Education (the Minister) that, under the current provisions of the Act, particularly Section 32(3), *'the Minister does not have the power to control the content of SRE'*.³

Each provider has sole responsibility for authorising the curriculum used by their instructors.

The NSW Department of Education's (the Department) Religious Education Implementation Procedures (REIPs)⁴ are in alignment with the Act and state that it is the responsibility of an approved provider to authorise the materials and pedagogy used by special religious education teachers. [p. 6]

5.2 Previous FIRIS audits

In June 2016 FIRIS conducted an audit of SRE providers' compliance with the requirement to have the content of their lessons or at least a program outline and curriculum scope and sequence documents available online.

FIRIS found that 61 of the then 105 providers (58%) did not have the required information available on the website provided by the Department in its list of approved providers. When this was brought to the attention of the Department it responded by stating that *'there is no requirement for the curriculum to be hosted on **that** website, the requirement is for it to be available on **a** website.'* (emphasis added)

In July 2017 FIRIS conducted another audit to see if it was possible for parents to *at least* identify the curriculum used by SRE providers to enable them to do an internet search to find the required information, if needed.

This audit found that 29 of the then 107 scripture providers (27%) did not even mention the curriculum used by their instructors on their websites. Furthermore, internet searches failed to find *'a'* website where the necessary information might be found.

Once again, FIRIS brought this to the attention of the Minister for Education and asked for the internet addresses where the required information could be found.

Once again, the Department did not provide this information.

In September 2017 FIRIS conducted another audit. Of the then 107 SRE providers FIRIS could not identify the curricula of 25 providers (23%).

³ Please note that all correspondence sent by FIRIS and Human Rights Advocacy Australia Incorporated to the NSW Minister for Education and/or the NSW Department of Education and the replies received can be made available on request.

⁴ The *Religious Education Policy*, last updated 20 October 2016, last viewed 12 April 2018 is located at: <https://education.nsw.gov.au/policy-library/policies/religious-education-policy>
The current *Religious Education Implementation Procedures* (REIPs), last updated December 2016, are located at: <https://education.nsw.gov.au/policy-library/associated-documents/REimplementproced.pdf>
The proposed 2019 *Special Religious Education Procedures* (SREPs) are available at: <https://schoolsequella.det.nsw.edu.au/file/ef3d9746-f038-47f4-8907-6a6fa3cb74ca/1/2019-SRE-Procedures.pdf>

5.3 February 2018 FIRIS Audit

FIRIS conducted an audit on 17 and 18 February 2018 based on the Department's online approved SRE provider list dated 16 February 2018.

Once again, the main criterion was whether it was at least possible to identify the curricula used by a provider as a result of following links on the website provided by the Department in the list of approved providers. The identification of curricula would at least enable a wider internet search for the location of the required information if it was not found at the given address or if there were no links found after an exploration using the URL provided by the Department.

Another focus of the audit was whether parents/caregivers could find a program outline and/or curriculum scope and sequence document for the curriculum used by a provider.

Please see **Appendix 3** for examples of what FIRIS regarded as meeting this requirement.

Of the 106 approved providers 14 (13.2%) were found to fail to identify the curriculum used despite thorough examinations of their websites, the use of website search functions when possible, and broader internet searches based on the name of the provider and the terms 'scripture', 'SRE', 'curriculum', 'scope and sequence', and 'lesson content'.

In 2 cases the web address provided by the Department was not functioning.

There were 4 cases where a wider internet search found the information required.

Of the 14 alleged non-compliant providers, 12 had not been found compliant in any of FIRIS' previous audits.

Of the 106 links provided by the Department in its list of approved providers:

- one (1) was directly to a curriculum outline (see the third example provided in **Appendix 3**)
- five (5) were directly to the webpage of a provider containing SRE information only, including one (1) Facebook page.

Of the 92 providers who did at least identify the curriculum used, FIRIS found mention of 65 different curricula.

Of the 250 links to curricula found on the websites of the 92 providers, 80 (32%) were directly linked to either a curriculum outline, syllabus outline, or a scope and sequence document.

The most widely used curricula in primary education are *Connect* (53 mentions) and *Godspace* (41 mentions). However, 28 providers identified both *Connect* and *Godspace* as approved curricula. Of these 28 providers seven (7) also identified Access Ministries (*Launch*, *Trek*, *Search*, *Quest*) as an additional authorised curriculum provider. Of these seven (7) providers one further identified *Christ our Light and Life* as another authorised curriculum while another identified both *Godly Play* and *Seasons of the Spirit* as additional approved curricula.

The most widely used curriculum in secondary schools is *Think Faith* (18 mentions). However, of these 18 providers, one also identifies a curriculum used at a single high school, another identifies a curriculum to be used for combined arrangements, another identifies resources provided by the Bible Society, another identifies its own secondary curricula, and another identifies 4 other curricula approved for use in secondary schools.

See **Appendix 4** for the detailed audit result for the *Connect*, *Godspace* and *Think Faith* curricula.

General issues identified in the February 2018 audit included:

- Failures to specifically identify curricula and indications that curricula are determined at the local level, for example, statements such as:
 - *High School SRE teachers use curriculum to teach a range of age groups determined by the school.*
 - *The local priest may authorise specific CEP material for use in high school SRE classes.*
- Failures to specifically identify curricula used and directions to the websites of publishers or third parties, such as:
 - the Inter-Church Commission on Religious Education in Schools (NSW) Inc (ICCOREIS) which only provides examples of a few curricula used in denominational or joint-denominational settings.
 - Youthworks
 - the CEP Store
 - **NOTE:** The CEP catalogue for secondary resources (<https://www.cepstore.com.au/high-school-books>) which contains 26 sets of resources, including *Think Faith*, as well as contentious resources such as Patricia Weerakoon's *Teen Sex by the Book*, a book which the publishers have stated is not being used in NSW public schools.
- Referrals by SRE providers to combined arrangements where the curricula used was not always identified.
- Incorrect or broken links
- Outdated information

See **Appendix 5** for the detailed general audit results.

6 Comparison of AA audit and curricula online audit results

The table below compares the number of URLs for the online location of curricula supplied by SRE providers in their AA for 2018 and the number of URLs found on the websites of providers (or on other sites) for curricula identified during the audit conducted by FIRIS in February 2018.

		No. of URLs for curricula identified in February 2018 audit								
		0	1	2	3	4	5	6	7	8
No. of URLs provided in 2018 AA	0	1								
	1	9	32	16	9	7	6	3		1
	2		2 (1 provider)	6 (3 providers)		2 (1 provider)				
	3				6 (2 providers)					

Of the 91 providers:

- 1 Failed to supply a URL in the AA for 2018 and all attempts by FIRIS to identify the curriculum used by the provider since August 2016 have been unsuccessful.

This provider remained on the Department's list of approved providers dated 18 April 2018.

- 83 Provided one (1) URL in their AA for 2018

- 9 FIRIS was unable to identify the curriculum used by the provider.

- 32 Identified one (1) curriculum on their own or another's website.

- 2 Provided a direct link to their curriculum scope and sequence information on both their website and their AA, however the hyperlink provided in the Department's list of approved providers for these two providers was to their home page.

- 16 Identified two (2) curricula on their own or another's website.

- 1 Provided a direct link in the AA for 2018 to the curriculum scope and sequence document of one of the two curricula identified in the February 2018 audit and also included a direct link to the same scope and sequence documents on its website.

- 1 Provided a direct link in the AA for 2018 to the curriculum scope and sequence document for both of the curricula identified in the February 2018 audit and

also included a direct link to the same scope and sequence document on its website.

- 9 Identified three (3) curricula on their own or another's website.
None of the URLs provided were directly to a curriculum outline or a scope and sequence document.
 - 7 Identified four (4) curricula on their own or another's website.
None of the URLs provided were directly to a curriculum outline or a scope and sequence document.
 - 6 Identified five (5) curricula on their own or another's website.
None of the URLs provided were directly to a curriculum outline or a scope and sequence document.
 - 3 Identified six (6) curricula on their own or another's website.
None of the URLs provided were directly to a curriculum outline or a scope and sequence document.
 - 1 Identified eight (8) curricula on their own or another's website.
None of the URLs provided were directly to a curriculum outline or a scope and sequence document.
- 5** Provided two (2) URLs in their AA for 2018
- 1 Identified one (1) curriculum identified on their own or another's website.
None of the URLs provided were directly to a curriculum outline or a scope and sequence document.
 - 3 Identified two (2) curricula on their own or another's website.
None of the URLs provided were directly to a curriculum outline or a scope and sequence document.
 - 1 Identified four (4) curriculum on their own or another's website.
None of the URLs provided were directly to a curriculum outline or a scope and sequence document.
- 2** Provided three (3) URLs in their AA for 2018 as well as identifying three (3) curriculum identified on their own or another's website.
None of the URLs provided were directly to a curriculum outline or a scope and sequence document

Of the 91 providers, 40 (44%) supplied the same number of URLs in their AA for 2018 as the number of curricula identified by FIRIS in its February 2018 audit.

7 2015 Review of SRE and SEE in NSW Government Schools

The NSW Department of Education commissioned ARTD Consultants to conduct an independent *Review of Special Religious Education and Special Education in Ethics in NSW Government Schools* (the ARTD Review) from December 2014 to December 2015.

The final version of the *2015 Review of Special Religious Education and Special Education in Ethics in NSW Government Schools* (the ARTD Final Report) is dated 23 March 2016.⁵ It was made available to the public on 11 April 2017.

The response of the Department to the recommendations of the Review is dated 11 April 2017.⁶

The most recent response of the SRE CC to the relevant recommendations of the Review is dated 13 December 2017.⁷

FIRIS is in possession of a draft Review Report, dated 4 December 2015, obtained by application for release in accordance with the provisions of the *Government Information (Public Access) Act 2009* (GIPA-16-287).

7.1 Self-regulation and transparency

The ARTD Review identified that the Department's *Religious Education Implementation Procedures* (REIPs) set out essentially a form of self-regulation for the delivery of SRE in NSW Government schools (ARTD Final Report, p. 34).

The reviewers noted:

Self-regulation in public policy always involves rights and responsibilities. For SRE, the rights relate to the ability of providers to access schools, and determine teachers and curriculum. The responsibilities are to fit within the Department's overall commitment to the education and welfare of children, and the management of schools. A closely related responsibility under self-regulation is transparency to parents, the Department, school communities and the wider public, through publication of important information and the provision of regular monitoring. (ARTD Final Report, p. 34)

The reviewers also stated:

Given that authorisation processes are self-regulated, it is important that sufficient information about SRE curriculum is available for parents so they can decide for themselves if the values and teaching espoused by providers match their own values. (ARTD Review, pp. xx-xxi & p. 51)

⁵ <https://education.nsw.gov.au/about-us/strategies-and-reports/our-reports-and-reviews/review-of-sre-and-see-in-government-schools>

⁶ https://education.nsw.gov.au/about-us/strategies-and-reports/media/documents/doe_reponse_sre_recommendations.pdf

⁷ <https://education.nsw.gov.au/about-us/strategies-and-reports/media/documents/Consultative-committee-response.pdf> - accessed 24.04.2018.

7.1.1 Compliance with the requirement to have curriculum information available online

The reviewers identified '*poor compliance across providers with making available to the public the curriculum scope and sequence and other resources used by them in SRE.*' According to the reviewers, at the start of the review in December 2014 '*just over one-third (39%) of providers had SRE curriculum information accessible on a website (their own or associated faith group)*'. (ARTD Review, pp. xx-xxi – data restated on p. 49)

7.1.2 Combined Arrangements

The reviewers noted that where combined SRE arrangements are in place, it is not easy for parents to identify the curriculum being used. (ARTD Final Report, p. 56)

Furthermore, the reviewers determined that it was unclear to them how a parent/caregiver might find out which are the relevant curriculum scope and sequence documents where SRE is being delivered by combined Christian arrangements. (ARTD Final Report, p. 49)

7.2 ARTD Review recommendations

7.2.1 Provision of online curriculum information

7.2.1.1 Recommendation 18

Even though since June 2013 the REIPs have stated:

It is the responsibility of an approved [SRE] provider to...make lesson content accessible on a website or at least provide a program outline and curriculum scope and sequence documents. [p. 6]

the ARTD reviewers recommended that all providers place in the public domain their curriculum scope and sequence and that this be in sufficient detail for parents/caregivers and schools to be able to understand what is covered in SRE lessons.

The Department stated that a response to this recommendation was to be developed by the NSW Consultative Committee for SRE (SRE CC).

The SRE CC supported the recommendation:

The SRE Providers agree to provide access in the public domain to curriculum scope and sequence tables for their respective SRE programs. These tables will include the following components – Title of a unit of work – Sequence of units for the year – Duration of the unit – Outcomes for the students – age and/or stage

Most SRE Providers already comply with this condition of the Annual Assurance Letter to the NSW Department for Education. SRE Providers agree to post on their

websites a direct link to the syllabus outlines of SRE Program(s) they authorise for use by their SRE Teachers.

Posting copies of the various Scope and Sequence charts is not recommended as it may create problems of version control when Curriculum Developers update their syllabuses.

SRE Providers who are also Curriculum Developers will be able to use their own websites to provide access to curriculum scope and sequence. [emphasis added]

7.2.1.2 Recommendation 19

The ARTD reviewers also recommended that the Department ‘negotiates and sets clear timelines for all faith groups and providers to comply with placing their curriculum scope and sequence in the public domain.’

Response

The Department supported this recommendation and stated it will recommend that it will be part of the annual assurance process.

7.2.1.3 Recommendation 20

The reviewers recommended that the Department ‘*monitors adherence to clearly stated expectations on a regular basis (e.g. five-yearly basis)*’.

Response

The Department again responded in principle that it supported the recommendation to monitor expectations as part of the annual assurance process.

8 Issues and concerns

8.1 NSW Consultative Committee for SRE responses to ARTD Review recommendations

FIRIS believes that it was an inappropriate and inadequate response by the Department to enable the SRE Consultative Committee (the Committee) to respond to certain recommendations given that the Committee is dominated by representatives of religious organisations who meet independently under at least two other biased, umbrella-organisation blocs, and given many of the organisations they represent continue to demonstrate an inability or unwillingness to comply with minimum policy requirements.

8.2 Annual Assurance

FIRIS questions the validity of the Department's reliance on the Annual Assurance in its response to the ARTD Review recommendations and the SRE CC's statement that most SRE providers already comply with the requirement in to place curriculum information online using the Annual Assurance.

The Department's responses to Recommendations 19 and 20 of the ARTD Review are inadequate given that they were made in April 2017 and that the Department enabled three SRE providers who failed to submit an Annual Assurance for 2017 to remained as approved providers throughout the 2017 school year.

The ability or the willingness of SRE providers to be transparent and accountable to the NSW Minister for Education, the Department, and the students, parents, caregivers and citizens of NSW is questionable given that, the curriculum of nine of the 16 providers who had not submitted their Annual Assurance for 2018 before the finalisation of GIPA-18-035 (on 18 March 2018) could not be located. Moreover, of these 9 providers, seven have previously failed to have the online location of their curriculum identified in any of the four audits conducted by FIRIS between August 2016 and September 2017.

It seems that the Department takes few steps to verify the information and to correct it where appropriate. This calls into question the validity and of the Department's reliance on the Annual Assurance as the sole means of managing child protection and safety risks.

The Department's website seems to make some stipulations that are at odds with the way SRE is provided and the way various organisations from SRE providers to SRE Boards to Combined Arrangements are established and potentially involved with each other -

- Applicant [to be an sre provider] must be a religious persuasion, demonstrated by a statement of beliefs and/or doctrine and:
 - confirmation that the organisation is not subject to the direction or control of any other organisation or body
 - confirmation that the organisation is not a combined body of religious persuasions.

And

- Applicant has identifiable leaders and appropriate organisation and governance demonstrated by
 - a description of the general organisation and conduct of the persuasion's religious activities
 - a statement regarding leaders and their responsibilities
 - details of the number of members and adherents
 - details of the places at which the organisation conducts its business and services
 - confirmation that the persuasion is independent and not a member of a wider umbrella organisation
 - if it is under another organisation, details of that organisation and the status of it within it
 - a copy of the constitution or organisational documents.

<https://education.nsw.gov.au/teaching-and-learning/curriculum/learning-across-the-curriculum/religion-and-ethics/approved-sre-providers/criteria-for-approval>

FIRIS would argue that some sre providers are “subject to the direction or control of other organisations or bodies” and are “members of wider umbrella organisations”.

8.3 Provision of online curriculum information

The need for the ARTD Review to recommend that all providers place in the public domain their curriculum scope and sequence, despite that having been a requirement to do so since 2013, along with the fact that 14 providers seemingly currently still fail to do so, calls into question the appropriateness of the current system of self-regulation of SRE.

The response to Recommendation 18 of the ARTD Final Report is inadequate and questionable given that:

- for both 2017 and 2018 less than 4% of the URLs provided in the Annual Assurances were direct links to a curriculum outline or scope and sequence document

- FIRIS' *Special Religious Education Curricula Audit Report: February 2018*⁸ found that:
 - of the 106 approved providers 14 (13.2%) failed to even identify the curriculum used by their instructors, let alone provide a link to the curriculum outline or scope and sequence document, on their website, preventing parents and caregivers from doing internet searches to find the required information.
 - of the 92 providers who did at least identify the curriculum used, 65 different curricula were mentioned, and there were a total of 250 different links to curricula, of which only 80 (32%) were directly linked to either a curriculum outline, syllabus outline, or a scope and sequence document.

Despite the ARTD Review's findings of systemic failings relating to SRE provider compliance and the lack of monitoring by either providers or the Department, the Minister's comment that the ARTD review found '*no widespread or systemic evidence of problems in the present system of SRE*' demonstrates his lack of respect for the rights of parents to make an informed decision regarding SRE.⁹

FIRIS' February 2018 audit calls into question the actions taken by the Department since the publication of the Review in consideration of the Minister's reported statement:

*The Department of Education has accepted a number of recommendations to improve transparency and accountability...The changes include ensuring information about providers and their curriculums are available to inspect online, improving complaint handling procedures and ensuring age-appropriate content.*¹⁰

Furthermore, the Department's appeal to the annual assurance process in response to Recommendation 19 of the ARTD Review - that the Department sets timeframes for all faith groups and providers to place their curriculum scope and sequence in the public domain - is inadequate.

Parents/caregivers are justified in asking why compliance with this simple requirement is still so poor five years after the implementation of the *Religious Education Implementation Procedures*, two years since the first version of the ARTD Review drew attention to the problem, and 10 months since the Minister made the comments above.

Given that 12 of the non-compliant providers have been brought to the attention of the Department on at least two occasions, FIRIS questions the efficacy of the annual assurance process and the veracity of the Department's statement that:

⁸ Located at: <http://religionsinschool.com/2018/02/27/do-not-expect-respect-for-your-rights-to-information/>

⁹ <http://www.smh.com.au/national/education/nsw-government-rejects-findings-of-independent-review-into-scripture-in-schools-20170411-gvis1c.html>

¹⁰ Jason Tin, The Daily Telegraph, April 11, 2017, 'State Government rejects school principals' pleas for 'opt-in' religious education'. <http://www.dailytelegraph.com.au/news/nsw/state-government-rejects-school-principals-pleas-for-optin-religious-education/news-story/0553d0d33ee2e44d7bf04fb06e6745e4> - accessed 21.05.2017.

If the provider does not have a link on a public website, the department follows up with the provider to place the curriculum on a website within a timeframe. Providers who do not meet this timeframe will have their approved status revoked and will be removed from the list of approved providers.

These twelve instances demonstrate that the Minister and the Department are either unwilling or unable to ensure required procedural compliance.

Whatever the case may be, FIRIS places little trust in the Department's oft-repeated claim that its personnel continue '*to work closely with providers of SRE in relation to their responsibilities and expectations*'.

FIRIS believes the ongoing non-compliance by some providers, the lengths parents/caregivers need to go to find the required information on the internet, and the questionable quality of a substantial portion of the information provided, demonstrates a lack of respect by many SRE providers for the rights of parents to information regarding their curricula.

8.4 Transparency of information about SRE

In consideration of the 'confusopoly' resulting from the lack of compliance with the requirement to place curricula information online, the number of curricula used in NSW Government schools and the lack of consistency in the information regarding widely used curricula, FIRIS supports the recommendation of the ARTD Review that schools place links to the SRE curriculums on their websites.

FIRIS notes that the Special Religious Education Procedures to be implemented in 2019 state:

Schools are responsible for...providing access to current information about approved providers working in their school, including links to the approved providers' authorised curriculum scope and sequence(s) and information on alternative meaningful activities. This information needs to be provided at enrolment, on the school's website, and in the school newsletter. [p. 5]

8.5 References to publisher websites without identifying curricula

In the cases where parents/caregivers of children in secondary schools are directed to the CEP Store without a curriculum being identified, they must assume that all the 26 resources are potentially being used, including resources supposedly not used for SRE, such as Patricia Weerakoon's *Teen Sex by the Book*.

The ARTD Review noted:

Many submissions from church groups and SRE Boards objected in very broad terms to interference by the Department in curricula. Several mentioned the banning of curriculum materials by the Department in 2015 as an example of interference. (ARTD Final Report, p. 50)

The Teachers' Christian Fellowship of NSW wrote:

Lack of understanding of the provisions of the Act for SRE *The attempt to ban SRE resources shows the lack of understanding by some officers within the Department of the provisions for SRE. The content and pedagogy of SRE lessons have nothing to do with the Department. These are matters entirely for the providers as indicated in the Department's own guidelines. The religious education to be given is in every case to be the religious education authorised by the religious body to which the member of the clergy or other religious teacher belongs. That a senior Department officer would seek to ban SRE materials is outrageous.*¹¹

Nonetheless, one provider does state that when choosing CEP material '*only material complying with DoE guidelines, suitable for use in public schools, should be used in SRE classes.*

However, the provisions for SRE in the *NSW Education Act 1990* and the lack of Ministerial or departmental authority over all curricula approved by SRE providers nullify all relevant policy, procedures and guidelines, for example, the *Controversial Issues in Schools Policy and Procedures* and the *Values in Public Education Policy*.

Despite the *Student Wellbeing Literature Review* developed by the Centre for Education Statistics and Evaluation stating:

A sense of belonging to the school environment is an established protective factor for child and adolescent health, education, and social wellbeing...Particular groups of students may also be more vulnerable to experiencing low levels of connectedness, including...lesbian, gay, bisexual, transgender students. Students with low connectedness are two to three times more likely to experience depressive symptoms compared to more connected peers. [p. 5]

https://www.cese.nsw.gov.au/images/stories/PDF/student_wellbeing_LR_AA.pdf

the Department's Wellbeing Framework contains no references to how the issues of gender and sexuality should be treated in NSW public schools.

https://www.det.nsw.edu.au/wellbeing/about/16531_Wellbeing-Framework-for-schools_Accessible.pdf

¹¹ <http://www.tcfnsw.org.au/htmarticles/Banning-books.html> accessed 13 February 2017.

The *Draft 2015 Review of Special Religious Education and Special Education in Ethics in NSW Government Schools* identified an example of approved curriculum content purchased from a large Christian publisher that were deemed by the Department to be age inappropriate and insensitive to children's welfare. One was purchased from a large Christian publisher. The reviewers wrote:

The workbook contained several negative passages about abortion, that cancer is a consequence of our sin and a gift from God, that we should die for our faith if necessary, teaches the concept of "headship" and that women should submit to their husbands, abstinence only sex education, negative LGBTI messages, that sexual intimacy is only acceptable to God between a married man and woman. [p. 45-46]

This statement was amended for the Final version of the Review Report:

Examples of text in the SRE teacher workbook that the Department considered insensitive are: negative passages about abortion, passages saying having cancer is a consequence of sin and a gift from God and that people should die for their faith, if necessary. The text also contained messages about sex education, which is not appropriate or the role of SRE. [49-50]

Although one of the providers who refers parents/caregivers to the websites of curriculum publishers writes:

Note to SRE teachers: The DoE also require that curriculum material be taught with 'sensitivity and in an age appropriate manner'. Below is a helpful link for SRE teachers, from the Baptist Church of NSW and ACT regarding sexuality and gender issues (written at the time of the Marriage Plebiscite).

<http://mailchi.mp/e98ea800795c/important-information-for-all-our-sre-teachers-september22-2017?e=2fddcc670b>

FIRIS is concerned at the seeming lack of an explicit policy statement that SRE curricula are not to include material related to sexuality and gender.

8.6 Combined arrangements

FIRIS is extremely concerned at the 'confusopoly' created by the existence of combined arrangements in NSW Government schools.

Combined arrangements are not SRE providers. The curricula being used in a combined arrangement must be authorised for use by at least one of its member churches who should be an approved provider or a member of an umbrella approved provider, but that seems at odds with what is pointed out in 8.2 above.

As identified by the ARTD Review and our audit, information regarding combined arrangements is difficult for parents to find. For example, FIRIS has been unable to determine the member churches of the combined arrangements mentioned by providers in this audit in order to identify the provider/s authorising the curricula being used.

Parents/caregivers ought to be able to identify the member churches of combined arrangements in order to ensure that all churches are approved SRE providers. Parents ought to be able to identify the curricula being used in their children's schools.

9 Conclusions

The failure of far-too-many providers to lodge a simple Annual Assurance before the due date at the beginning of both 2017 and 2018 (see Appendices 1 and 2, next page), and the omissions and inconsistencies in information in an extremely disconcerting number of Annual Assurances that were lodged for both the 2017 and 2018 school years demonstrates that far-too-many of the 100-plus providers have little interest in or respect for accountability, and that the current system of self-regulation of SRE is woefully inappropriate, particularly as a significant aspect is compliance with the *Child Protection (Working with Children) Act 2012*.

That three providers who seemingly failed to lodge an Annual Assurance for 2017 were allowed to provide SRE in NSW Governments throughout the 2017 school year calls into question the efficacy of the annual assurance process and Department's appeal to the annual assurance process in response to Recommendations 19 and 20 of the ARTD Final Report. It also calls into question the veracity of the Department's oft-repeated statement in correspondence to FIRIS that its personnel continue '*to work closely with providers of SRE in relation to their responsibilities and expectations*'.

That the Department has little interest in holding SRE providers accountable is also demonstrated by the apparent failure to verify the information provided in the Annual Assurances *per se*, so SRE providers could be required to correct it where necessary to ensure that information required is provided to the schools and the public.

This audit demonstrates that the current system of self-reporting by SRE providers is manifestly inadequate for managing a multi-provider and multi-layered network and program present in the vast majority of NSW government schools. It demonstrates rank failure to ensure that the rights of both parents/caregivers and school-children to accurate and honest information.

The current provisions for SRE in the *NSW Education Act 1990* and the associated policies and procedures prevent the NSW Minister for Education and the NSW Department of Education from developing an appropriate and rigorous system to oversee and manage child-protection and safety and to mitigate risk for various forms of abuse of NSW public school students.

Appendix 1



Education
Public Schools

DGL17/768 - TAB A

Annual Assurance of Providers of Special Religious Education 2017

The Department of Education is seeking a written assurance that your organisation currently has in place processes that satisfy the requirements for teaching Special Religious Education (SRE) in NSW Government schools for the 2017 school year.

The Child Protection (Working with Children) Act 2012 (the Act) applies to all persons who undertake child-related work. The Act requires a person, who is employed or engaged in work that will ordinarily involve direct contact with children to obtain a NSW Working with Children Check (WWCC) Clearance prior to commencement of duties.

The Department of Education regards the conduct of SRE in NSW Government schools to be child-related work.

1. SRE Teacher

Any worker who your organisation intends to engage as a teacher of SRE must apply for a WWCC Clearance. It is the responsibility of the provider to ensure that each teacher has obtained this clearance and for the provider to verify that clearance prior to the teacher starting work. It is also the responsibility of the provider to keep records of the teacher's WWCC Clearance and verification. SRE teachers are not permitted to work on an application number.

A volunteer under the age of 18 is exempt from needing a WWCC. The department requires that volunteers under the age of 18 complete the department's **Working with Children Check – Declaration for Volunteers and Contractors** form to declare that the person is not a disqualified person within the meaning of section 18 of the Act. The Declaration must be completed and delivered to the approved provider prior to the teacher commencing duties.

The approved provider must submit to the school a list of the names and contact details of local representatives and authorised teachers before the commencement of SRE in 2017.

Additionally, providers will be required to supply the date of birth of their SRE personnel to the school as soon as practicable but before 31 March 2017. The addition of the date of birth to the list will allow schools to check the department's NTBE (Not to be Employed) database. Authorised teachers will be permitted to deliver SRE in Term 1 2017, even if date of birth information is not provided. Further information regarding principal responsibilities associated with cross-referencing authorised teachers on the department's Electronic Casual Pay Claim (eCPC) will be provided to principals in Term 1 2017.

All information must be provided on documentation identifying the approved provider (e.g. a letter with the provider's letterhead), otherwise principals will need to request the information be resent.

The approved provider must ensure that SRE teachers present photo identification upon request by the school. SRE teachers must also be issued by the approved provider a name badge that includes the name of the authorising approved provider. The name badge must be worn at all times whilst on a school site.

More information can be found at: <http://www.kidsguardian.nsw.gov.au/Working-with-children/working-with-children-check>

2. Child protection training and classroom management training

DGL17/768 - TAB A

Approved providers are required to have in place a system of authorised initial and ongoing training for their volunteer teachers that includes training in child protection and classroom management issues. This information is to be published on the provider's website.

3. Combined arrangements

Where a SRE teacher participates in a combined arrangement for SRE, the teacher must be authorised by an approved provider of SRE in NSW Government schools.

4. Curriculum

Approved providers are required to provide online access to their authorised age-appropriate curriculum and/or curriculum outline and ensure SRE teachers are teaching the curriculum with sensitivity and in an age appropriate manner. Please provide a website link to where this can be found.

The curriculum delivered through a combined arrangement must be the publically available curriculum that is authorised by at least one of the approved providers.

5. Verification required to be provided to NSW Government schools

Before a teacher of SRE can work in a NSW Government school, it is the provider's responsibility to verify that the relevant requirements as outlined in section 1 of this document have been met by completing the attached form and return it by email to: SREcontact@det.nsw.edu.au by 27 January 2017.

Information about SRE related matters can be accessed on the website <https://education.nsw.gov.au/curriculum/religion-and-ethics>

Your reply to this letter with the required assurances will ensure you have approval to provide SRE in NSW Government schools for 2017.

Thank you for your support of SRE in NSW Government schools.

Yours sincerely

Jason Miezis

Director, Early Learning and Primary Education

For more information contact

Learning and Teaching Directorate
 Josh Chenery
 SRE/SEE Officer
 Level 3, 1 Oxford Street, Darlinghurst NSW
 2010
 9244 5484
SREcontact@det.nsw.edu.au
www.dec.nsw.gov.au
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Education
Public Schools

DGL17/768 - TAB A

Annual Assurance of Providers of Special Religious Education 2017

This form is to be returned by 27 January 2017 to:
Joshua Chenery, Special Religious Education & Special Education in Ethics Officer
EMAIL: SREcontact@det.nsw.edu.au

On behalf of the named provider below, I declare to the Department of Education as follows:

1. That all special religious education teachers engaged by this provider have either obtained Working with Children Check Clearance numbers, and evidence including verification of clearance is kept on record, or if under 18, have undertaken the appropriate declaration to the effect that they are not disqualified persons within the meaning of section 18 of the *Child Protection (Working with Children) Act 2012*, and copies of the declarations are kept on record.
2. That the provider has in place a system of authorised initial and ongoing training for their teachers that includes training in classroom management and child protection, and that this information is published on the providers' websites.
3. That an outline of the authorised age appropriate curriculum/s used in schools is/are provided to the public via a website, and the special religious education teachers are teaching the curriculum with sensitivity and in an age appropriate manner. The curriculum/s can be found at:

<http://> _____

I warrant to the Department of Education that I am authorised to make this declaration on behalf of _____ (Name of Provider), and I acknowledge that the Department will rely on both the information I have provided and this warranty.	
Name:	
Position:	
Signature:	Date:
Address:	
Telephone:	
Email:	
Provider Website:	

Appendix 2



Education
Public Schools

Annual Assurance of Providers of Special Religious Education 2018

The Department of Education is seeking a written assurance that your organisation currently has in place processes that satisfy the requirements for teaching Special Religious Education (SRE) in NSW Government schools for the 2018 school year.

The Child Protection (Working with Children) Act 2012 (the Act) applies to all persons who undertake child-related work. The Act requires a person, who is employed or engaged in work that will ordinarily involve direct contact with children to obtain a NSW Working with Children Check (WWCC) Clearance prior to commencement of duties.

The Department of Education regards the conduct of SRE in NSW Government schools to be child-related work.

1. SRE Teacher

Any worker your organisation intends to engage as a teacher of SRE must apply for a WWCC Clearance. It is the responsibility of the provider to ensure that each teacher has obtained this clearance and for the provider to verify that clearance prior to the teacher starting work. It is also the responsibility of the provider to keep records of the teacher's WWCC Clearance and verification. SRE teachers are not permitted to work on an application number.

A volunteer under the age of 18 is exempt from needing a WWCC. The department requires that volunteers under the age of 18 complete the department's **Working with Children Check – Declaration for Volunteers and Contractors** form to declare that the person is not a disqualified person within the meaning of section 18 of the Act. The Declaration must be completed and delivered to the approved provider prior to the teacher commencing duties.

The approved provider must submit to the school a list of the names, date of birth and contact details of local representatives and authorised teachers before the commencement of SRE in 2018. This will allow schools to check the department's NTBE (Not to be Employed) database. All information must be provided on documentation identifying the approved provider.

The approved provider must ensure that SRE teachers present photo identification upon request by the school. SRE teachers must also be issued by the approved provider a name badge that includes the name of the authorising approved provider. The name badge must be worn at all times whilst on a school site.

More information can be found at: <http://www.kidsguardian.nsw.gov.au/Working-with-children/working-with-children-check>

2. Child protection training and classroom management training

Approved providers are required to have in place a system of authorised initial and ongoing training for their volunteer teachers that includes training in child protection and classroom management issues. This information is to be published on the provider's website.

3. Combined arrangements

Where a SRE teacher participates in a combined arrangement for SRE, the teacher must be authorised by an approved provider of SRE in NSW Government schools.

4. Curriculum

Approved providers are required to provide online access to their authorised age-appropriate curriculum and/or curriculum outline and ensure SRE teachers are teaching the curriculum with sensitivity and in an age appropriate manner. Please provide a website link to where this can be found.

The curriculum delivered through a combined arrangement must be the publically available curriculum that is authorised by at least one of the approved providers.

5. Verification required to be provided to NSW Government schools

Before a teacher of SRE can work in a NSW Government school, it is the provider's responsibility to verify that the relevant requirements as outlined in this document have been met by completing the attached form and return it by email to: SREcontact@det.nsw.edu.au by 29 January 2018.

Information about SRE related matters can be accessed on the website <https://education.nsw.gov.au/teaching-and-learning/curriculum/learning-across-the-curriculum/religion-and-ethics>.

In response to the recommendations from the 2015 Review of Special Religious Education and Special Education in Ethics, the Special Religious Education Procedures have been updated and will be available in early 2018. Providers have additional responsibilities which includes publishing on the providers website:

- the authorised curriculum scope and sequence
- complaints handling procedures
- and processes to authorise SRE teachers (minimum requirements, qualifications and basic training).

The provider understands that all changes must be implemented by the provider as soon as possible but no later than 31 October 2018.

Your reply to this letter with the required assurances will ensure you have approval to provide SRE in NSW Government schools for 2018. Approved providers will lose their approved provider status if the responsibilities outlined in the annual assurance are not addressed.

Thank you for your support of SRE in NSW Government schools.

Yours sincerely

Rod Megahey

A/Director, Early Learning and Primary Education

For more information contact

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 SRE/SEE Officer
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www.dec.nsw.gov.au
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Education
Public Schools

Annual Assurance of Providers of Special Religious Education 2018

This form is to be returned by 29 January 2018 to:
Joshua Chenery, Special Religious Education & Special Education in Ethics Officer
EMAIL: SREcontact@det.nsw.edu.au

On behalf of the named provider below, I declare to the Department of Education as follows:

1. That all special religious education teachers engaged by this provider have obtained Working with Children Check Clearance numbers and evidence including verification of clearance is kept on record. If under 18, special religious education teachers have undertaken the appropriate declaration to the effect that they are not disqualified persons within the meaning of section 18 of the *Child Protection (Working with Children) Act 2012* and that copies of the declarations are kept on record.
2. That the provider has in place a system of authorised initial and ongoing training for their teachers that includes training in classroom management and child protection. The information can be found on the providers website at: <http://>_____.
3. That an outline of the authorised age appropriate curriculum/s used in schools is/are provided to the public via a website, and the special religious education teachers are teaching the curriculum with sensitivity and in an age appropriate manner. The curriculum/s can be found at: <http://>_____.
4. That the provider is aware that there is a revised Special Religious Education Procedures which will be available early 2018. The provider understands that all changes must be implemented by the provider as soon as possible but no later than 31 October 2018.

I warrant to the Department of Education that I am authorised to make this declaration on behalf of _____ (Name of Provider), and I acknowledge that the department will rely on both the information I have provided and this warranty.

Name:	Position:
Signature:	Date:
Telephone:	Email:
Address of organisation:	
Provider Website home page:	

Appendix 3

Below are examples of what was FIRIS deemed meeting the criteria of having a curriculum outline available online.

Scripture Classes

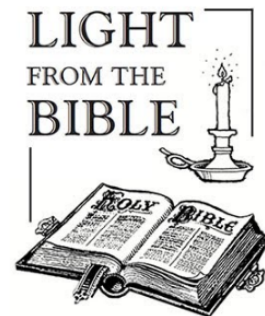
For Special Religious Education (SRE) in NSW schools the Church of the Living God uses an approved series of workbooks called, Light from the Bible. This series consists of three levels, Infants School, Primary School and High School.

THE INFANTS LEVEL develops the children's understanding of God and who He is. We see how powerful God is as demonstrated in the creation of the earth and all the beautiful things we see and enjoy in our daily lives. Then we look at how important children are to God as His created beings and how sensitive God is to their fears and feelings. He is only a prayer away.

THE PRIMARY LEVEL looks at how God wants to dwell with people. What we mean to God as His sons and daughters and the purpose God created the heaven and earth. We look at our responsibilities in looking after the earth and our friends and family. All the lessons have an academic content with questions and puzzles from a text, and other age-related activities.

The HIGH SCHOOL curriculum answers students' questions: why does God allow suffering; how to find peace, comfort and satisfaction; how to make a difference; how to discover meaning in the journey of life, using Christian role models. Its purpose is to inspire hope in students and encourage them to fulfil their potential, believing each of them as an individual is special to God. Our courses seek to motivate and strengthen them to think before they act and make their own choices according to Christian values, and equip them to withstand the pressures that can drive them to despair, suicide and drugs.

All curriculums are Bible-based and age-relevant material expressed in a contemporary manner with activities they are used to in their classrooms. We look at Bible history, believing in God in today's world and faith in the Lord Jesus Christ. Christ is our example of good behaviour, kindness, compassion and strength.



The aim of the Special Religious Education (S.R.E.) program is to enable students to study the Scriptures and learn to apply the truths to their own lives in the present world.

The Lesson Series presented includes:

- Beginnings
- The Lives of The Patriarchs
- Joseph
- Moses Chosen Deliverer
- Moses the Lawgiver
- Joshua
- The Judges
- Ruth
- Life of David 1
- Life of David 2
- Esther
- Daniel
- Life of Christ 1
- Life of Christ 2
- Life of Christ 3
- Life of Christ 4
- Life of Peter
- Acts 1 - The Early Church
- Acts 2 - Paul

The order of topics is not prescriptive and may be influenced by students' needs, interests and level of understanding. An expanded curriculum is available.

HIGH SCHOOL CURRICULUM

covering a 40 week school year:

This curriculum has been developed to give the student an understanding of the place of man in creation and in society and give him the tools to have a vital personal relationship with a living God thus finding and fulfilling his destiny. The core values taught within this course enable a person to find solutions to their everyday problems.

(2 classes given on each subject)

1. Where did the Bible come from?
2. The Bible and archaeological discoveries.
3. What does the Bible say about hygiene and disease?
4. The Bible as a moral and ethical code of conduct.
5. The Bible as a book of history.
6. Creation fact or fiction?
7. What does the Bible have to say about Jesus?
8. Who is Jesus?
9. Core life values inherent in the teachings of Jesus?
10. Why did they crucify Jesus?
11. What was the mission of Jesus?
12. Who were the disciples and what made them different?
13. What impact did the early disciples have upon the societies of their day?
14. Why did Christianity spread as quickly as it did?
15. What is a missionary?
16. Who/what constitutes a church?
17. Has the church lost its relevancy in society?
18. Why does the church do missionary work?
19. Famous Christians and the mark they have made on Society.
20. How does the world view the church of today - different church denominations - different beliefs and directions - how can we understand it all?

Appendix 4

Connect

Below is a breakdown of the links provided for the 53 mentions of *Connect* found during the audit.

In the description of the route taken to find the required information ‘>’ signifies the need to press ‘Enter’ in order to go to another page, ‘|’ signifies a link provided in a drop down selection menu, and the bold numerals represent the number of new pages visited.

- 24 CEP Connect Curriculum (<http://cepconnect.com.au/curriculum>)
Curriculum > **1.** View the Connect syllabus and lesson aims > **New Connect Cycles A to C Overview** (<http://cepconnect.com.au/images/uploads/Connect-Syllabus.pdf>)
- 5 CEP Connect Catalogue (<https://www.cepstore.com.au/connect>)
1. Click here to see the Connect syllabus and lesson aims > **New Connect Cycles A to C Overview** (PDF) (<https://www.cepstore.com.au/Content/Images/uploaded/Connect-Syllabus.pdf>)
- 6 CEP Connect (<http://cepconnect.com.au/curriculum.%20>)
Home > **1.** Curriculum > **2.** View the Connect syllabus and lesson aims > **New Connect Cycles A to C Overview** (<http://cepconnect.com.au/images/uploads/Connect-Syllabus.pdf>)
- 4 Direct to **New Connect Cycles A to C Overview** (PDF)
1 <http://www.whysre.com.au/images/files/Connect-Syllabus.pdf>
3 <https://www.cepstore.com.au/Content/Images/uploaded/Connect-Syllabus.pdf>
- 3 CEP Connect (www.cepconnect.com.au)
Home > **1.** Curriculum > **2.** View the Connect syllabus and lesson aims > **New Connect Cycles A to C Overview** (<http://cepconnect.com.au/images/uploads/Connect-Syllabus.pdf>)
- 3 *whySRE?* homepage (<http://www.whysre.com.au/cepcurriculum>)
Home > **1.** SRE Curriculum | CEP Curriculum Overview > **2.** Click here to see the Connect syllabus and lesson aims > **New Connect Cycles A to C Overview** (PDF) (<http://www.whysre.com.au/images/files/Connect-Syllabus.pdf>)
- 2 Christian Education Publications (CEP) home page (<https://www.cepstore.com.au/>)

Home > **1. Primary School** | **2. Years 1 to 6 – Connect** > **3. Click here to view the Connect syllabus and aims** > **New Connect Cycles A to C Overview** (PDF)

<https://www.cepstore.com.au/Content/Images/uploaded/Connect-Syllabus.pdf>

- 2 CEP Store Primary School Curricula Catalogue (<https://www.cepstore.com.au/primary-school-books>)

Primary School > **1. Years 1 to 6 – Connect** > **2. Click here to view the Connect syllabus and aims** > **New Connect Cycles A to C Overview (PDF)**

<https://www.cepstore.com.au/Content/Images/uploaded/Connect-Syllabus.pdf>

- 1 whySRE? CEP Curriculum Overview (<http://www.whysre.com.au/sre-curriculum/cep-curriculum-overview>)

1. Click here to see the [Connect syllabus and lesson aims](#) > **New Connect Cycles A to C Overview** (PDF) (<http://www.whysre.com.au/images/files/Connect-Syllabus.pdf>)

- 1 CEP Connect Samples (<http://cepconnect.com.au/samples>)

Connect Samples > 1. Curriculum > **2. View the Connect syllabus and lesson aims** > **New**
Connect Cycles A to C Overview (<http://cepconnect.com.au/images/uploads/Connect-Syllabus.pdf>)

- 1 CEP SRE and RI Curriculum Info (<https://www.cepstore.com.au/sre-ri-curriculum-info>)

SRE and RI Curriculum Info > **1. Connect** is a Bible-based curriculum designed to engage students week by week through music, drama reading and writing, puzzle solving , drawing and asking questions > **2.** Click here to view the Connect syllabus and aims > **New Connect Cycles A to C Overview** (<https://www.cepstore.com.au/Content/Images/uploaded/Connect-Syllabus.pdf>)

- 1 Incorrect link to Access Ministries resources

Godspace

Below is a breakdown of the links provided for the 41 mentions of *Godspace* found during the audit.

In the description of the route taken to find the required information ‘>’ signifies the need to press ‘Enter’ in order to go to another page, ‘|’ signifies a link provided in a drop down selection menu, and the bold numerals represent the number of new pages visited.

- 16 Godspace Homepage (<https://www.godspace.org.au/home.html>)
 Home > **1. Curriculum** > **2. Overview of three-year curriculum** > **Summary of 3 year curriculum 2017-2019** (https://www.godspace.org.au/curriculum_3_year_summary.html)
 Home > **1. Scope and sequence** > **Being updated COMING Feb 12 2018**
- 16 Godspace Curriculum (<http://www.godspace.org.au/curriculum.html>)
 Curriculum > **1. Overview of three-year curriculum** > **Summary of 3 year curriculum 2017-2019** (https://www.godspace.org.au/curriculum_3_year_summary.html)
- 3 Direct to **Summary of 3 year curriculum 2017-2019**
 (https://www.godspace.org.au/curriculum_3_year_summary.html)
- 2 Godspace Scope and Sequence (http://www.godspace.org.au/scope_%26_sequence.html)
 Scope and sequence > **Being updated COMING Feb 12 2018**
 One includes a photograph of the overview page from a Godspace resource, most likely the Green Two Lesson Manual.
- 2 No link provided
- 1 Godspace Curriculum Purple 2017 (https://www.godspace.org.au/curriculum_P.html)
- 1 Link to 'Summary of 3 year curriculum' for 2014-2016

Think Faith

In the description of the route taken to find the required information '>' signifies the need to press 'Enter' in order to go to another page, '|' signifies a link provided in a drop down selection menu, and the bold numerals represent the number of new pages visited.

7 **About Think Faith** (PDF)

3 separate locations

https://www.youthworks.net/images/uploads/general/About_Think_Faith.pdf

https://www.youthworks.net/images/uploads/general/TF_General_Introduction_jan15b.pdf

https://thinkfaith.com.au/files/About_Think_Faith.pdf

6 ourSRE (Generate Ministries) Curriculum (<http://oursre.org.au/content/oursre-curriculum/gjq8h5>)

ourSRE Curriculum > **1. Think Faith the New curriculum for high school SRE** > **2. Think Faith home page** > **3. Download and read all about *Think Faith* (PDF)** > ***About Think Faith* (PDF)**

- 2 Think Faith website (<https://thinkfaith.com.au/>)

Think Faith > **1. Download and read all about *Think Faith* (PDF)** > ***About Think Faith* (PDF)**

- 1 whySRE home page (<http://whysre.com.au/>)

whySRE home page > **1. SRE Curriculum | CEP Curriculum Overview** > **2. Click here to see the Think Faith syllabus** > ***About Think Faith* (PDF)**
(https://www.youthworks.net/images/uploads/general/About_Think_Faith.pdf)

- 1 CEP Store – Think Faith subscription (<https://www.cepstore.com.au/think-faith-subscription>)

No clear link to curriculum outline evident.

- 1 About Generate Ministries (<http://generate.org.au/content/about/ginfqh>)

About Generate Ministries > **1. Go SRE | SRE Curriculum** > **2. Think Faith the New curriculum for high school SRE** > **3. Think Faith home page** > **4. Download and read all about *Think Faith* (PDF)** > ***About Think Faith* (PDF)**

Appendix 5

Other providers

Failure to identify curricula

- 1 Statement regarding secondary curriculum:

High School SRE teachers use curriculum to teach a range of age groups determined by the school.

Counted as compliant in the audit because of the information provided regarding the curricula used in primary schools.

References to publisher websites without identifying curricula

- 1 Statement regarding secondary curriculum:

The local priest may authorise specific CEP material for use in high school SRE classes.

- 1 Statement that provider uses curricula developed by Godspace, Youthworks and the CEP Store.
- 1 Failure to identify curriculum used and directing of parents/caregivers to the Youthworks SRE page (<https://www.youthworks.net/sre>).
- 2 Failure to identify curriculum used and directing of parents/caregivers to the CEP Store (<https://www.cepstore.com.au/>).
- 1 Failure to identify the secondary SRE curriculum used and direction of parents to the CEP catalogue for secondary resources (<https://www.cepstore.com.au/high-school-books>).

If a parent/caregiver of a child in primary school visits the Youthworks home page (<https://www.youthworks.net/>) and follows the route

Home > SRE > Authorised curriculum > Click here (<http://cepconnect.com.au/images/uploads/Connect-Syllabus2011-11.pdf>) to view the authorised Primary SRE program for the Sydney Anglican Diocese.

They will most likely conclude that *Connect* is the curriculum being used.

If a parent/caregiver of a child in secondary school visits the Youthworks home page (<https://www.youthworks.net/>) and follows the route

Home > SRE > Authorised Curriculum > Click here (<https://thinkfaith.com.au/>) to view the authorised High School SRE program for the Sydney Anglican Diocese

they will most likely conclude that the secondary curricula being used is *Think Faith*.

If a parent/caregiver of a child in primary school visits the CEP website (<https://www.cepstore.com.au/>) and follows the route

Home > Primary School

they will most likely conclude that the curricula being used are *Beginning With God*, *Connect* and *Big Questions*.

If a parent/caregiver of a child in secondary school visits the CEP website (<https://www.cepstore.com.au/>) and follows the route

Home > High School

they find the CEP catalogue for secondary resources (<https://www.cepstore.com.au/high-school-books>) which contains 26 sets of resources, including *Think Faith*. However, it also includes contentious resources such as Patricia Weerakoon's *Teen Sex by the Book*, a book which the publishers have stated is not being used in NSW public schools.

Failure to provide links to required information

- 3 Identification of curricula used but the websites provided do not contain a curriculum outline, syllabus outline or a scope and sequence document.

Combined arrangements

There were five referrals by SRE providers to combined arrangements.

- 1 Failure to identify curricula and directing parents to the website of a combined arrangement where curricula are identified.
- 2 Failure to identify curricula stating that the curricula are authorised by a single combined arrangement.
- 1 Identification of one curriculum but referral of parents/caregivers to the website of a combined arrangement where other curricula are mentioned.

Combined arrangement refers to SRE as 'Christian Studies'.

- 1 Failure to identify curricula and directing parents to the website of a combined arrangement which also fails to mention the curricula used.

General

- 1 Link to curriculum takes parents/caregivers to Youthwork's 'SRE Accreditation Page' (<https://www.youthworks.net/sre/sre-accreditation-training>) Facebook pages for parents to obtain information from.
- 1 Reference to the *Bible Society - Good News Beads* but link provided does not work.
- 1 Website under construction but provider deemed compliant because of information available in the recent past.
- 1 Information provided for 2017 only.
- 1 Link to scope and sequence document broken.
- 1 One curriculum identified but then provider directs parents/caregivers to the Inter-Church Commission on Religious Education in Schools (NSW) Inc (ICCOREIS) website at www.iccoreis.asn.au and the Youthworks website to find out information regarding the curricula the provider uses across NSW.

The issues faced by a parent trying to identify the curriculum used in their child's schools when visiting the Youthworks website have been discussed above.

If a parent/caregiver visits the ICCOREIS website and follows the route

Home > Teaching SRE | Curriculum

will only find examples of a few curricula used in denominational or joint-denominational settings.