



# Office of the Anti-Discrimination Commissioner

*Celebrating Difference, Embracing Equality*

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12 December 2008

Ms Cassandra Dawes  
Project Officer  
Race Discrimination Unit: Education and Partnerships Section  
Australian Human Rights Commission  
GPO Box 5218  
SYDNEY NSW 2001

By email: [frb@humanrights.gov.au](mailto:frb@humanrights.gov.au)

Dear Ms Dawes,

***Re: Freedom of Religion and Belief in the 21<sup>st</sup> Century Submission***

Thankyou for the opportunity to comment on the *Freedom of Religion and Belief in the 21<sup>st</sup> Century* project.

By way of background, the Office of the Anti-Discrimination Commissioner (OADC) administers the Tasmanian *Anti-Discrimination Act 1998* (the ADA). The ADA prohibits discrimination, inciting hatred and other specified conduct and provides for the investigation and conciliation of, and inquiry into, complaints in relation to such discrimination and conduct. My other roles and functions as Commissioner include consulting and inquiring into discrimination; disseminating, preparing and publishing guidelines; and undertaking research and educational programs to promote attitudes, acts and practices against discrimination and prohibited conduct.

As a general statement of principle, the OADC believes that all people should be free to practice their religious beliefs, as long as such practices adhere to Australian laws. The OADC has a strong view that religious beliefs are not a valid reason to discriminate against others.

The OADC also believes it is important to ensure that issues of race discrimination and religious discrimination are not conflated. It is the OADC's experience that some people have tended to conflate particular religions, such as Islam, with race. Race and religious belief or affiliation and religious activity are separate grounds under the ADA. The definition of race in s3(d) of the ADA includes ethno-religious origin, but any complaints without a race element are adequately covered by the attributes of religious belief or affiliation and religious activity.

The OADC comments as follows in relation to specific questions for consideration.

## 1. Evaluation of 1998 HREOC Report on Article 18: Freedom of Religion and Belief

### 1. What are areas of concern regarding the freedom to practice and express faith and beliefs, within your faith community and other such communities?

The OADC receives complaints of discrimination and inciting hatred on the basis of religious belief or affiliation and religious activity. While several complaints on these grounds are received each year, they are not among the most complained about attributes. These complaints may demonstrate areas of concern regarding the freedom to practice and express faiths and beliefs in the Tasmanian community.

*Youssef v Khani* [2006] TASADT 8:

During the course of a meeting, the respondent made comments to the complainant including “*Fuck Allah*”, “*Fuck your prophet Mohammed*” and “*Fuck Moslems*”. The Tasmanian Anti-Discrimination Tribunal (the Tribunal) held this constituted discrimination on the basis of religious belief, but not inciting hatred because it was a private meeting and there was no public act.

*McIntosh v TAFE Tasmania* [2003] TASADT 14:

The complainant was a practising Muslim and alleged his employer did not provide an adequate prayer room and that he was required to take leave at Easter and Christmas. The Commissioner dismissed the complaint on the basis that a room to pray in was provided which, although not ideal, was the only available room. While it was admitted that leave was required to be taken at Christmas and Easter, this was required under the relevant teaching award. Further, the complainant’s requests for leave on Islamic holy days was granted. The Tribunal upheld the Commissioner’s decision to dismiss the complaint.

*AS:*

The complainant, a Muslim taxi driver, was insulted by a passenger, including comments such as, “*What the fuck, Muslim. What are you doing here in Australia?*” Other similar comments were made at a bottle shop in front of a bar attendant. In an unreported decision, the Tribunal held that the complainant was discriminated against on the basis of race, religious belief or affiliation and religious activity and also that the respondent had incited hatred on the basis of race, religious belief or affiliation and religious activity.

*E:*

The complainant was a practising Muslim and alleged that he was told he was trying to “convert” someone when he was only talking to them; he was called a “*Muslim poofster*”; comments were made that Muslims needed to be sent back to their own countries; and at a fundraiser barbecue he asked if the sausages were beef and was told that they were, but later the same person came over to him laughing and said they were “*full of pig*”. The complaint was resolved at conciliation.

S:

The complainant was non-Jewish and attended a synagogue. The complainant was told that she was not welcome and she believed this was because of her religious belief (non-Jewish). The complaint was dismissed because the respondents provided reasons as to why they did not want the complainant there, which were unrelated to her religious belief. The respondents also provided information showing that non-Jewish people were welcome at the synagogue and that they encouraged interfaith dialogue.

The OADC is currently undertaking a questionnaire regarding racial and religious discrimination, harassment, intimidation, abuse and attack. It should be noted that the majority of returned surveys have reported instances of racial, rather than religious, discrimination, harassment, intimidation, abuse or attack. Common examples have been egg throwing from cars at people of Asian or African descent. Other common examples have been racial abuse at bus stops or on busses. Accounts have also been given of bus drivers not stopping for people of African descent, even though the bus wasn't full.

While this study has not yet been completed, returned questionnaires have included the following accounts of religious discrimination, harassment, intimidation, abuse or attack:

*A man in a car shouted at a woman and her two daughters, all wearing hijabs.*

*A policeman acted aggressively towards a church group and tried to attack the prophecy board used to show someone's testimony about how they were healed from HIV by God's power.*

Just as concerning is the number of complaints the OADC has received where discrimination has been motivated by religious beliefs. It is of concern that religious beliefs are impacting on people in areas of public life; that religious beliefs are a reason for discrimination against people on the basis of other attributes.

K:

The complainant alleged discrimination on the basis of marital status. His application for the position of principal at a religious school was unsuccessful because his marriage was not recognised by the church because the church had not annulled his wife's previous marriage. The complaint has been referred to the Tribunal for inquiry.

S:

The complainant alleged discrimination on the basis of marital status, relationship status and parental status. His employment was terminated when his employers discovered he had a child and was living with his partner outside of marriage, which was contrary to their religious beliefs. The complaint was resolved at conciliation.

2. Have new issues emerged since this report was published in 1998 relating to expression of faith?

The OADC notes that of the complaints made on the basis of religious belief or affiliation or religious activity, the majority relate to alleged discrimination or inciting hatred against Muslims.

In the unpublished decision of *AS* (above), the Tribunal noted when considering the inciting hatred test<sup>1</sup> that factors that could have led to a person being incited against the complainant on the grounds of religion included that the incident took place only three months after September 11 and the feeling towards Muslims as a result.

This suggests that September 11 has contributed towards ill feeling towards Muslims and, as a result, there may be an increased chance of being subjected to discrimination or inciting hatred. Although the OADC has no data on this point, it may be that this would affect the expression of faith by Muslims.

3. Is there adequate protection against discrimination based on religion or belief, and protection of ability to discriminate in particular contexts?

The ADA prohibits discrimination on the basis of the prescribed attributes in s16, including religious belief or affiliation and religious activity. Religious belief or affiliation is defined in s3 as holding or not holding a religious belief or view, and religious activity is defined in s3 as engaging in, not engaging in, or refusing to engage in religious activity.

Two types of discrimination are prohibited under the ADA, direct and indirect discrimination. Direct discrimination occurs when a person is treated less favourably than another person because of his or her religious belief or affiliation and/or religious activity: s14. Indirect discrimination occurs when a condition, requirement or practice disadvantages a person or a group of people because of their religious belief or affiliation and/or religious activity and that condition, requirement or practice is unreasonable in the circumstances: s15.

Discrimination on the basis of religious belief or affiliation and religious activity is unlawful in the areas of employment, education and training, provision of facilities, goods and services, accommodation and membership and activities of clubs.

In the OADC's view, this adequately protects people from discrimination on the basis of their faith in areas of public life.

The ADA contains exceptions relating to discrimination on the basis of religious belief or affiliation and religious activity. Exceptions permit conduct that would otherwise be unlawful discrimination.

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<sup>1</sup> Whether a hypothetical listener or observer, an ordinary reasonable person, could understand from the conduct of the respondents that he or she was being incited to hatred towards, serious contempt for, or severe ridicule of a person on the grounds of his or her race: *John Fairfax Publications Ltd v Kazak* [2002] NSWADTAP 35 at [14, 16]; *Burns v Radio 2UE Sydney Pty Ltd & Ors* [2004] NSWADT 267 at [14].

## **51. Employment based on religion**

- (1) A person may discriminate against another person on the ground of religious belief or affiliation or religious activity in relation to employment if the participation of the person in the observance or practice of a particular religion is a genuine occupational qualification or requirement in relation to the employment.*
- (2) A person may discriminate against another person on the ground of religious belief or affiliation or religious activity in relation to employment in an educational institution that is or is to be conducted in accordance with the tenets, beliefs, teachings, principles or practices of a particular religion if the discrimination is in order to enable, or better enable, the educational institution to be conducted in accordance with those tenets, beliefs, teachings, principles or practices.*

## **52. Participation in relation observance**

*A person may discriminate against another person on the ground of religious belief or affiliation or religious activity in relation to –*

- (a) the ordination or appointment of a priest; or*
- (b) the training and education of any person seeking ordination or appointment as a priest; or*
- (c) the selection or appointment of a person to participate in any religious observance or practice; or*
- (d) any other act that –*
  - (i) is carried out in accordance with the doctrine of a religion; and*
  - (ii) is necessary to avoid offending the religious sensitivities of any person of that religion.*

The OADC is concerned that the exceptions may be too broad, particularly s51(2). It is difficult to see how holding the same religious belief as a school should be required to teach Maths, English or History, for example.

The ADA also contains general exceptions, which permit discrimination in the following circumstances.

## **23. Charities**

*A person may –*

- (a) include a discriminatory provision in a document or instrument that provides exclusively for charitable benefits wholly or partly for persons with a prescribed attribute; and*
- (b) do any act that is required to give effect to that provision.*

## **24. Actions required by law**

*A person may discriminate against another person if it is reasonably necessary to comply with –*

- (a) any law of this State or the Commonwealth; or
- (b) any order of a commission, court or tribunal.

## **25. Disadvantaged groups and special needs**

*A person may discriminate against another person in any area if it is for the purpose of carrying out a scheme for the benefit of a group which is disadvantaged or has a special need because of a prescribed attribute.*

## **26. Equal opportunities**

*A person may discriminate against another person in any program, plan or arrangement designed to promote equal opportunity for a group of people who are disadvantaged or have a special need because of a prescribed attribute.*

### **4. How are federal and state and territory governments managing incitement to religious hatred, and the question of control and responsibility?**

Section 19(d) of the ADA prohibits a person, by a public act, inciting hatred towards, serious contempt for, or severe ridicule of a person or a group of persons on the ground of religious belief or affiliation or religious activity. It is part of civil law and there is no criminal equivalent.

It is important to note that inciting hatred on the ground of religious belief or affiliation and religious activity is a separate ground of complaint to inciting hatred on the ground of race, unlike some other jurisdictions. The OADC is of the view that this is the preferable approach, as race and religion are separate concepts.

There is an exception to inciting hatred in s55 of the Act.

## **55. Public purpose**

*The provisions of section 19 do not apply if the person's conduct is –*

- (a) a fair report of a public act; or
- (b) a communication or dissemination of a matter that is subject to a defence of absolute privilege in proceedings for defamation; or
- (c) a public act done in good faith for –
  - (i) academic, artistic, scientific or research purposes; or
  - (ii) any purpose in the public interest.

The OADC is of the view that the ADA provides adequate protection against incitement to hatred on the basis of religion while ensuring that freedom of expression, in good faith, is maintained.

### **5. How well have the recommendations of Article 18: Freedom of Religion and Belief been implemented by the various state and federal governments?**

Since the introduction of the ADA in 1998, discrimination and inciting hatred on the ground of religion has been prohibited in Tasmania, in line with the suggestions in the *Article 18: Freedom of Religion and Belief* report.

## **2. Religion and the State – the Constitution, roles and responsibilities**

### 1. Is this section (116) of the Constitution an adequate protection of freedom of religion and belief?

The OADC notes that private organisations do not have to abide by s116 of the Constitution. For example, religious schools wanting teachers of a particular religion may be permitted to include a religious test for applicants, absent discrimination laws, although the Commonwealth would not be permitted to require a particular religious belief as a qualification for any Commonwealth office. The OADC is of the view that s116 is inadequate in that it does not protect individuals applying for positions with private organisations from being subjected to religious requirements.

### 2. How should the Australian Government protect freedom of religion and belief?

The OADC supports protection from discrimination on the basis of religious belief or affiliation and religious activity by way of anti-discrimination legislation at both state and federal levels.

The OADC also supports the introduction of a Charter of Rights, again both at state and federal levels. The OADC supports the inclusion of a right to freedom of religion and belief, with a broad definition to include non-belief, on the proviso that there are relevant exceptions ensuring that freedom of religion cannot form a basis to unlawfully discriminate against others in areas of public life. The OADC further supports a model that enables private organisations to opt in and be subject to a Charter.

### 3. When considering the separation of religion and state, are there any issues that presently concern you?

The main issue of concern to the OADC is religious organisations citing religious beliefs as a reason to be exempt from discrimination laws. Currently in Tasmania, the Catholic Church is seeking an amendment to the ADA to include an exception that would permit religious schools to refuse enrolments to students not of the school's faith. The OADC finds this particularly concerning as public funding is provided to private schools, including religious schools. Please find attached the OADC's submission in relation to this matter for a full account of the OADC's concerns.

Another issue of concern is that the OADC has received anecdotal reports that a religious organisation funded to provide settlement services to new arrivals will not provide information about contraception due to the religious beliefs of the organisation.

Other anecdotal reports suggest that new arrivals with different religious beliefs feel a sense of obligation to the service provider and feel that they need to attend the same church. In the OADC's view, this is a subtle form of conversion.

The OADC is of the view that if funding is to be provided to religious organisations to provide such services, there should be strict guidelines regarding the non-discriminatory provision of the service.

4. Do religious or faith-based groups have undue influence over government and/or does the government have undue influence over religious or faith-based groups?

A recent issue of concern is that the Tasmanian Government chose to include the Catholic Church's proposal for an exception to refuse enrolment of students on the basis of religious belief as part of an administrative review of the ADA. The proposed exception proposes a significant limitation to the operation of the substantive provisions of the ADA and it is inappropriate to include it in a review of administrative provisions. In the OADC's view, this suggests that certain religious groups in Tasmania have some influence over government.

5. Would a legislated national Charter of Rights add to these freedoms of religion and belief?

The OADC believes that a national Charter of Rights has the potential to add to freedom of religion and belief. If a Charter is enacted, it is probable that it will require the legislature to scrutinise and consider whether proposed legislation is compliant with Charter rights (the ACT and Victorian Charters require either the Minister introducing a bill or the Attorney-General to prepare a statement of compatibility).

A scrutiny process is likely to result in less legislation breaching human rights,<sup>2</sup> including the right to freedom of religion. This is important because under the ADA, s24 permits discrimination if it is reasonably necessary to comply with a law of Tasmania or a law of the Commonwealth. Accordingly, a Charter of Rights is likely to strengthen freedom of religion at least in this regard.

6 – 9. Roles and responsibilities

The OADC strongly supports a co-operative approach to promote interfaith dialogue and supports educational programs addressing tolerance of different religions and atheism in all schools. The OADC believes that awareness of religious diversity should be encouraged from primary school onwards, as it is an integral step to ensure interfaith harmony and inclusion in society.

The OADC supports the establishment of interfaith reference groups at both state and federal levels. The OADC believes such groups will promote and enhance harmony.

**3. Religion and the State – practice and expression**

1. What are some consequences of the emergence of faith-based services as major government service delivery agencies?

In addition to the comments made in 3.3 above, the OADC is of the view that the religious beliefs of an organisation should not inhibit the provision of services and

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<sup>2</sup> It should be noted, however, that in both the ACT and Victoria parliamentary sovereignty is maintained and legislation can be enacted that is not compliant with Charter rights.

that services must be provided in a non-discriminatory way. This is consistent with the principle of the separation of church and state.

The OADC is further of the view that non-discriminatory practices must be reflected in funding guidelines.

2. How should government accommodate the needs of faith groups in addressing issues such as religion and education, faith schools, the building of places of worship, religious holy days, religious symbols and religious dress practices?

The OADC is of the view that students of any faith be permitted to attend religious schools funded by the government and that schools not be permitted to refuse to enrol students on the basis of their religious beliefs. Please see the attached submission outlining the OADC's concerns in this area.

The OADC is of the view that people should be allowed to wear religious dress and symbols in employment, as what dress and symbols a person wears does not generally have a bearing on their ability to perform the inherent requirements of a job. Not allowing an employee to wear religious dress or symbols may be discrimination on the basis of religious belief or activity. However, in some circumstances, there may be occupational health and safety factors – such as working with machinery, which means that particular clothing or religious jewellery would be inappropriate in the workplace.

The OADC is also of the view that religious dress should be accommodated in schools and sporting activities. To refuse to allow religious dress may constitute discrimination. A flexible uniform policy can accommodate all people and allow, for example, women to wear the hijab, but it may be reasonable to require that the religious dress complement the colours of the uniform.

The OADC has received one complaint raising issues about leave for holy days, *McIntosh v TAFE Tasmania* [2003] TASADT 14 (above at 1.1). The OADC is of the strong view that employees should be able to access leave entitlements for religious holy days, subject to the inherent requirements of the position. To unreasonably refuse leave may amount to discrimination on the basis of religious belief or activity.

3. Is current legislation on burial practice and autopsy practice adequate? Are any other of your religious practices inhibited by law, procedural practice or policy (i.e. education or health)?

The OADC notes that s24 of the ADA permits discrimination on the basis of religious belief or affiliation and religious activity if it is necessary to comply with a law of the State or Commonwealth. Accordingly, if a person discriminates against another person on the ground of a particular religious belief because of the operation of a law, it will not be unlawful discrimination.

The OADC is not able to comment further on this issue, as there have not been any complaints received regarding burial and autopsy procedures.

#### **4. Security issues in the aftermath of September 11**

##### 2. How should the government balance physical security and civil liberties?

The OADC believes a Charter of Rights would assist in this process, particularly if it contains provisions requiring the scrutiny of proposed legislation to see whether it is compatible with Charter rights.

##### 3. Consider and comment on the relationship between law and religious or faith-based communities, and issues such as legal literacy, civil liberties, dissemination of law to new immigrant communities, and the role and conduct of the judiciary, courts and police.

From experience, the OADC is aware that new arrivals of diverse race and religious faiths are often reluctant to raise concerns with people in authority, including the police, for fear of persecution, often stemming from treatment received in their homelands. It is also apparent from the questionnaire currently being conducted by the OADC (see 1.1 above) that many people do not report incidents to the police or other authorities because they believe nothing will be done about it.

The OADC encourages community education to make people aware of their rights and responsibilities. The OADC believes that if people are aware of their rights and responsibilities they are less likely to come before the courts and, if they are subjected to unlawful conduct, that they will be more likely to bring it to the attention of the police or other relevant bodies.

The OADC currently conducts community education sessions upon request. However, the OADC strongly supports including education sessions regarding legal rights and responsibilities, including discrimination, as an integral part of the settlement program.

##### 5. Can you provide any examples of social exclusion in regard to religion? How and why do issues of social exclusion develop?

The complaints received by the OADC, noted in 1.1 above, provide some examples of exclusion, or at least attitudes held by individuals that could potentially lead to exclusion. While the OADC recognises that how issues of social exclusion develop is a complex issue, the OADC comments generally that there can be elements of ignorance about new arrivals, particularly arrivals from countries that have not had a strong presence in Tasmania, such as the Sudanese arrivals in the late 1990s. Members of the Sudanese community in Tasmania have diverse religious beliefs and comprise both Christians and Muslims. However, it may be that issues of social exclusion are related more to observable differences, such as race – particularly colour, than religion.

The OADC also comments generally that media portrayal of Muslims after events such as September 11, the Bali Bombings and the Cronulla riots, government policies, and actions and statements of politicians may contribute to the development of social exclusion issues among the general populace.

It is the OADC's view that if people are educated from an early age about difference and diversity, issues of social exclusion are less likely to develop.

## **5. The interface of religious, political and cultural aspirations**

### 5. What do you think should be the relationship between the right to gender equality and the right to religious freedom in Australia?

The OADC is of the view that private faith should not interfere with other human rights, including gender equality, in public areas of life.

The OADC also notes that Australia has obligations under the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW), ratified in 1983. The *Sex Discrimination Act 1984* (Cth) gives effect to Australia's obligations under CEDAW. Discrimination on the basis of sex is unlawful under the ADA in Tasmania.

### 8. Is there a role for religious voices alongside others in the policy debates of the nation?

The OADC believes all people should be able to publicly air their opinions in policy debates, including religious voices, subject to reasonable limitations on freedom of expression such as inciting hatred.

## **6. Technology and its implications**

### 6. Are there religious or moral implications in the development of new technologies such as the Internet or mobile phones, especially in regard to religious vilification and hatred?

The OADC notes that new technology is beneficial in that providing information about different faiths may be disseminated to a large audience. However, there may be problems of vilification of religious groups or, conversely, religious groups expressing views vilifying groups on the basis of attributes contrary to their religious belief (for example, on the basis of sexual orientation).

As previously mentioned, the ADA prohibits inciting hatred, which must include a public act. Public act is defined in s3 of the ADA as including any form of communication to the public, any conduct observable by the public and the distribution or dissemination of any matter to the public.

Although no complaints have been received involving new technology, it is likely that the definition of public act would include written postings on Internet sites or chat rooms, emails, text messages sent to many people and videos posted on Internet sites such as You Tube and My Space.

## **7. Religion, cultural expression and human rights**

### 5. Are there issues in regard to participation in the faith community for people with disabilities?

In Tasmania, discrimination on the basis of disability is unlawful, including in the area of the provision of facilities, goods and services. If there is no disability access to churches, synagogues and mosques etc, a complaint of discrimination may be lodged.

#### 6. How is diverse sexuality perceived within faith communities?

The OADC has received reports from the community of religious beliefs leading to discrimination on the basis of sexual orientation, particularly homosexuality.

The OADC is also concerned in relation to the proposed exception to the Tasmanian legislation to permit religious schools to refuse enrolment of students who do not adhere to the school's faith. As noted by the OADC in the attached submission:

*“Other potential ramifications of the exception are that applicants may be excluded for other discriminatory reasons. For example, although an applicant identifies with a particular religion, if he or she is gay, pregnant and unmarried, or has divorced parents or parents in a same-sex relationship, the school may argue that these circumstances are contrary to the tenets of its religion and may be refused enrolment. Again, it will be up to a particular school to determine how to assess whether an applicant adheres to the tenets of a particular religion”.*

#### 7. How can faith communities be inclusive of people of diverse sexualities?

The OADC is of the view that if it is a matter of a religious organisation providing services, education or employment, the question of a person's sexual orientation is completely irrelevant. There is no reason to question what a person's sexuality is if they are applying for a job, are a client or a customer. It is unlawful to discriminate against a person on the basis of his or her sexual orientation in these areas.

The OADC believes that faith communities can be inclusive of people of diverse sexualities by treating them with respect and in the same way as everyone else. In this regard, education and dialogue between different groups is important and the OADC strongly supports such initiatives.

#### 8. Should religious organisations (including religious schools, hospitals and other service delivery agencies) exclude people from employment because of their sexuality or their sex and gender identity?

The OADC is of the strong view that religious organisations should not be allowed to exclude people from employment because of their sexuality or their sex and gender identity. To do so would be to permit discrimination on the basis of sexual orientation and gender identity.

The OADC is of the view that not permitting religious organisations to exclude people on the basis of their sexuality or gender identity does not conflict with freedom of religion. This is because, in private, people are free to practice their religion and religious beliefs. However, in the public sphere when religious organisations are providing employment and service delivery, it is important to ensure that currently

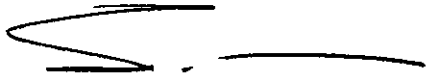
unlawful discrimination is not made lawful. This would impinge on many other people's human rights of non-discrimination.

10. (a) Are there religious groups, practices and beliefs that you think are of concern to Australians?  
(b) Should these be subjected to legislative control and should they be eligible for government grants and assistance?

The OADC has earlier noted its view that religious organisations that receive funding to provide services should be required to comply with state and federal laws, including anti-discrimination legislation. The OADC is of the view that religious organisations should be eligible for grants and assistance on the proviso that employment and services are provided in a non-discriminatory way. The OADC believes this will ensure that religious groups will not be subject to either greater or less restrictions than any other group; they will be required to act in the same manner as any secular group providing services.

I trust the OADC's submission assists in the *Freedom of Religion and Belief in the 21<sup>st</sup> Century* project and ultimately to work towards a more cohesive and harmonious society. Please contact Ms Catherine Edwards, Complaints Manager, if clarification or further information is required.

Yours sincerely,



Sarah Bolt  
**Anti-Discrimination Commissioner**