

Education (General Provisions) and Other Legislation Amendment Bill 2024

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SUBMISSION:

***Inquiry into the *Education (General Provisions)*
and Other Legislation Amendment Bill 2024
(Qld)***

Committee Secretary
Education, Employment, Training and Skills Committee
Queensland Parliament

Parliament House
George Street
BRISBANE QLD 4000

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25 March 2024

Dear Committee Secretary,

On behalf of Answers in Genesis (**AIG**), I welcome the opportunity to make a submission to the Queensland (**QLD**) Parliament's Education, Employment, Training and Skills Committee (**Committee**) in relation to its [Inquiry](#) into (**Inquiry**) the [Education \(General Provisions\) and Other Legislation Amendment Bill 2024](#) (QLD) (**Bill**) introduced into the QLD Parliament on 6 March 2024.¹

AIG² is an apologetics ministry dedicated to enabling Christians to defend their faith and to proclaim the gospel of Jesus Christ effectively. AiG produces home schooling material which is used in Australia. The supporter base of AiG includes many parents who homeschool their children.

Our submission particularly relates to the amendments proposed by the Bill to the [Education \(General Provisions\) Act 2006](#) (QLD) (**EGP Act**), particularly the provisions in Chapter 9, Part 5 of the EGP Act which sets out the requirements and eligibility for home education registration.

Our submission also discusses other documents associated with the Bill, including the [Explanatory Notes](#), [Explanatory Speech](#), [Statement of Compatibility \(SOC\)](#) and [written advice of the QLD Department of Education \(DOE\)](#).

This submission has the approval of AIG as a national organisation in Australia.

AIG would be very willing to meet with the Committee to discuss these submissions.

Yours Sincerely,

Dan Flynn

Executive Director | Answers in Genesis | Australia

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¹ See <https://www.legislation.qld.gov.au/view/html/bill-first/bill-2022-052/lh>.

² See <https://answersingenesis.org/>.

EXECUTIVE SUMMARY

AIG has a keen interest in home education in Australia (including in QLD) and its regulation by Government. In particular, AIG is a parent ministry for many outreaches and publications which relate to Biblical curriculum. It also runs ministries which are particularly directed to the home education context and which aim to equip educators. For example, among other things, AIG is a parent ministry for:

- Answers Bible Curriculum, a chronological Bible curriculum to equip churches and homeschools;
- Answers VBS, a Vacation Bible School curriculum; and
- Answers Academy, a Biblical worldview private school located in Northern Kentucky, USA.

These AIG ministries are well-established in the USA, and AIG is also in the process of establishing its ministries within Australia, including to equip Australian home educators. AIG aims to have Biblical foundations taught right across education platforms, including home education. As such, AIG has a particular interest in the Bill's proposals to amend the regulation of home education in QLD.

Our submission therefore particularly addresses those clauses in Part 4 of the Bill amending the EGP Act regarding home education (particularly Chapter 9, Part 5 of the EGP Act). It also addresses Schedule 1 amendments to EGP Act nomenclature, aimed at 'modernising' 'gendered language'. We submit that:

1. **Home education regulation should not be enhanced:** There is no evident need to enhance regulation of home education in QLD, as existing regulation is sufficient. Increasing home education registrations points to the viability of, and sufficiency of the existing supports for, high-quality home education.
2. **The new Guiding Principles should be clarified or removed:** We have concerns about the new Guiding Principles that home education should be provided in a way that is in the best interests of the child, taking into account their safety and wellbeing. They must not be used to require parents to justify why home education is in their child's best interests or lead to Government overreach of parental rights.
3. **Home education programs should not be prescribed:** We strongly oppose prescription of home education programs, including the national curriculum. It may disincentivize home education, dilute its distinctives, and wrongly prevent parents from using programs better adapted to their circumstances, worldview or personal/religious beliefs. It may be disruptive for existing home educators, and is ultimately unnecessary given existing requirements that children receive a high-quality home education and Government oversight of parent reporting. The Bill also already proposes other changes to enhance the rigor around home education programs.
4. **Parent reporting requirements should not be strengthened, and provisional registrations should potentially remain:** We are open to some of the other relatively minor amendments in the Bill to home education regulation, but oppose the strengthening of parent reporting requirements because existing provisions are sufficient. We also query whether the separate time-limited provisional registration application process should be retained, as it seems of potential benefit to parents.
5. **'Gendered language' should remain:** At this stage, we do not comment on the other amendments regarding school education, except to oppose 'modernising' the EGP Act to remove any 'gendered language'. This is unnecessary and inappropriate given different views on gender in modern society.

Recommendations:

AIG recommends that the QLD Government:

1. Abandon its policy objectives regarding enhancing the regulation of home education in QLD.
2. Remove the new Guiding Principles regarding home education or insert notes to mitigate concerns, e.g. stating that home education is generally in a child's best interests or recognising parental rights.
3. Omit those sections of the Bill which prescribe home education programs and strengthen parent reporting requirements, and also consider retaining provisional registration application provisions.
4. Omit those sections of the Bill which remove 'gendered language' in the EGP Act.

Our submissions are discussed in more detail below.

SUBMISSIONS

1. There is no evident need to enhance regulation of home education in QLD, as existing regulation is sufficient. Increasing home education registrations points to the viability of, and sufficiency of the existing supports for, high-quality home education.

The Bill has overarching policy objectives to “improve the regulation of education in [QLD]”. This is to be achieved by legislative amendments which (among other things) “modernise and improve education services” by “enhancing the regulation of home education” and “streamlining” its registration process.³

From the outset, we disagree that regulation of home education should be enhanced. In our view, the existing system is already subject to sufficient regulation. While we will not labour this point, given the extensive consultation which preceded the Bill and informed its policy objectives,⁴ we consider that the home education system is currently working well and there is no evident need to enhance its regulation.

The Explanatory Notes suggest that the Bill amends the EGP Act home education provisions to ensure that it “continues to provide contemporary support for quality home education, particularly given the steady increase in home education registration in recent years”.⁵ Essentially, it argues that increasing home education registrations justify further regulation. However, we contend that the sharp increase in registrations in recent years points to the fact that the system is defined well and there is sufficient support for the delivery of quality home education already. Evidently, many parents and caregivers have been drawn to the home education system as a viable alternative to enrolling their children at formal schools. According to the Explanatory Speech, there has in fact been a 195% increase in students registering for home education since 2019. There are currently just over 10,000 students registered for home education in QLD.⁶ Evidently, home education is becoming an increasingly attractive option. In our view, the Government should focus on addressing any factors relating to education at formal schools which may be increasingly driving parents towards home education, rather than changing the regulation of a home education system which is evidently flourishing in the context of the current regulation.

As such, we recommend that the Government abandon its policy objectives regarding enhancing the regulation of home education in QLD. However, recognising that the Bill is predicated on policy objectives with this aim, we will also briefly address some of the Bill’s specific amendments below.

2. We have concerns about the new Guiding Principles that home education should be provided in a way that is in the best interests of the child, taking into account their safety and wellbeing. They must not be used to require parents to justify why home education is in their child’s best interests or lead to Government overreach of parental rights.

The Guiding Principles in s7 of the EGP Act are amended by Bill clause 18. This includes amendments to s7(b) regarding the way that education should be provided generally, but also to insert a new s7(da) with new Guiding Principles specifically regarding home education. In particular, they state that home education “should be provided in a way that ... is in the best interests of the child ... taking into account their safety and wellbeing; and ... ensures the child or young person receives a high-quality education”.⁷

It is obviously vital to protect the best interests of children and their safety and wellbeing, including in home education contexts. However, we are cautious about this amendment for several reasons. Firstly, we query why it is necessary to insert new Guiding Principles specific to home education, in light of the existing ones regarding parents and education generally. For example, the Guiding Principles in s7(b) as

³ See Page 1 of the Explanatory Notes.

⁴ According to Pages 2 and 23 to 24 of the Explanatory Notes.

⁵ See Page 8 of the Explanatory Notes.

⁶ See page 480 of the Explanatory Speech.

⁷ See page 37 of the Bill and pages 11 and 30 of the Explanatory Notes.

amended by the Bill would already require education to be provided in a way that “provides positive learning experiences”, promotes “a safe and supportive learning environment”, etc.. Any practical implications of new s7(da) also seem unclear. A Government media release states that the amendments will *require* home education to be provided in a way that is in the best interests of the child, without clarifying further.⁸ The Explanatory Speech simply states that the change “makes explicit that a child or young person’s best interests must be central to the significant choice of home education”. It otherwise only seems to indicate that the amendments which the Bill secures are themselves in the best interests of children.⁹ Otherwise, Government material does not, for example, seem to elaborate on when home education may be provided in a way that is *not* in a child’s best interests taking into account their safety and wellbeing. However, it is implicit in new s7(da) that home education may be provided in such a way.

Ultimately, there is a tension between parental rights and Government oversight here. Parents have a critical role in determining what is the best interests of their child. We caution against any approach that ever requires parents to justify why home education is in a child’s best interests, casts home education as generally not in a child’s best interests, or leads to Government overreach in determining what is in a child’s best interests in how home education occurs. We emphasise that parents should always be able to home educate their children (with appropriate Government oversight) simply because they are their children, not because they need to prove it is in their child’s best interests. We are also wary of potential ideological interpretations of the concepts of ‘best interests’, ‘safety’ and ‘wellbeing’, particularly in a context where the national curriculum might now be prescribed (discussed below) – e.g. of Government overreach where parents’ teaching of the national curriculum reflects worldviews or personal/religious beliefs that differ from the approach of the national curriculum. Essentially, QLD home education should reflect the approach of the *International Covenant on Civil and Political Rights*, which explicitly enshrines the liberty of parents to ensure the religious and moral education of their children in conformity with their own convictions.¹⁰ For example, no parent should be seen as jeopardising a child’s best interests, safety or wellbeing just because they teach in a way that aligns with their beliefs. As DOE itself states, “home education legislation is about respecting your right as a parent to home educate your child”.¹¹

To mitigate such concerns, we recommend that the Government consider removing the new Guiding Principles regarding home education or else consider inserting notes about them, e.g. to state that home education is generally in a child’s best interests or recognising the importance of parental rights.

3. We strongly oppose prescription of home education programs, including the national curriculum. It may disincentivize home education, dilute its distinctives, and wrongly prevent parents from using programs better adapted to their circumstances, worldview or personal/religious beliefs. It may be disruptive for existing home educators, and is ultimately unnecessary given existing requirements that children receive a high-quality home education and Government oversight of parent reporting. The Bill also already proposes other changes to enhance the rigor around home education programs.

Clause 68 of the Bill, amending EPG Act s217, prescribes new requirements for the educational program for a child registered for home education. Notably, it must now “be consistent with an approved education and training program”. Per clause 68(5), this means the national school curriculum; a senior subject syllabus for a senior subject; a vocational education and training course; or a combination of these things.¹²

We are particularly concerned about this aspect of the Bill and strongly oppose this change. In our view, the Government should *not* prescribe particular educational programs. As a DOE fact sheet [here](#) confirms, in choosing to home educate, parents accept responsibility for planning, implementing, and monitoring

⁸ For example, this QLD Government statement: <https://statements.qld.gov.au/statements/99849>.

⁹ Pages 480 to 481 of the Explanatory Speech: https://documents.parliament.qld.gov.au/events/han/2024/2024_03_06_WEEKLY.pdf#page=58.

¹⁰ See particularly Article 18: <https://www.ohchr.org/en/instruments-mechanisms/instruments/international-covenant-civil-and-political-rights>.

¹¹ Page 3 of DOE fact sheet: <https://education.qld.gov.au/schools-and-educators/other-education/Documents/home-education-fact-sheet.pdf>.

¹² See Page 8 of the Explanatory Notes and pages 69 and 70 of the Bill.

their child's educational progress.¹³ Home education is entirely predicated on this concept, and prescribing a particular curriculum greatly disempowers parents in planning their child's learning. It also dilutes a key distinctive of home education – the ability to use a flexible curriculum. As research commissioned by DOE in 2022 (DOE Research)¹⁴ confirms [here](#), home education, for many, is “about being able to provide more personal, individual learning”. Factors such as “greater flexibility, more or better learning opportunities” and “being able to provide better quality education experiences”, also feature highly. In fact, “a common reason for home educating includes the child being able to learn ... with a flexible curriculum that meets their needs”.¹⁵ Prescribing particular programs undermines this. While parents could still tailor their child's education using the national curriculum, this may not suit many families. As DOE itself states, some parents may find a ‘ready-made’ curriculum “an unnecessary or limiting approach to home education”.¹⁶ Parents should of course be *able* to use the national curriculum if they wish, but should not be *required* to do so. The inverse may disincentivize home education for parents who would be prevented from using other high-quality programs better adapted to their circumstances, worldview or personal/religious beliefs. When it comes to reasons to home educate, the DOE Research quantified that 41% of parents say it aligns with their educational philosophy, 27% because it aligns with their family's beliefs, and 48% because of philosophy or faith.¹⁷ Clearly, many parents are motivated to home educate because it better accords with their beliefs than formal schooling. Some parents may also have specific concerns about the national curriculum. For example, the DOE Research itself states that COVID-19 was “a catalyst for interest in home education”, including because of “lockdowns exposing parents to the curriculum (which was often viewed negatively e.g. ‘is this what they are learning?’)”.¹⁸ We strongly believe that parents with such concerns about the content contained in the national curriculum should be able to select other high-quality content.

In any case, it is unnecessary to prescribe particular programs. According to Home Education Australia (HEA), most registered families are succeeding with homeschooling, even if they are not following the national curriculum.¹⁹ Parents are clearly capable of developing and adapting other programs. This is evident even just from the increased popularity of home education in QLD: ever more parents are finding it a viable option. In our view, the existing requirement in s217 of the EGP Act which requires parents to ensure their child receives a ‘high-quality education’ is sufficient to mitigate concern about what home educated children are taught, together with parent reporting requirements which ensure the requisite Government oversight. DOE publishes an extensive list of things that may demonstrate a child receives a high-quality education, so this requirement is far from tokenistic.²⁰ There is no compelling rationale for otherwise prescribing a particular program to be used when other high-quality programs exist. Doing so simply makes home education far less adaptable to a child's particular needs. It would also be disruptive for existing home educating families who are unfamiliar with the national curriculum but forced to follow it.²¹ The other amendments proposed by clause 68 to s217, e.g. that the educational program must “be suitable for the child having regard to the child's age, ability, aptitude and development”, “provide the child with a comprehensive course of study in a diverse range of subjects or learning areas”, and “include subjects or learning areas that are the study of English and mathematics”, also clearly enhance the rigor around home education programs in any case. There is no need to also prescribe a particular curriculum.

The Explanatory Notes do point out that most Australian jurisdictions require home education programs to meet the jurisdiction's approved curriculum requirements, apart from the Australian Capital Territory

¹³ Page 1 of DOE fact sheet: <https://education.qld.gov.au/schools-and-educators/other-education/Documents/home-education-fact-sheet.pdf>.

¹⁴ See <https://education.qld.gov.au/schools-educators/other-education/home-education>.

¹⁵ See Pages 3 and 12: <https://education.qld.gov.au/schools-and-educators/other-education/Documents/research-insight-report.pdf>.

¹⁶ Page 2 of DOE fact sheet: <https://education.qld.gov.au/schools-and-educators/other-education/Documents/home-education-fact-sheet.pdf>.

¹⁷ See page 14 of the research report.

¹⁸ See page 41 of the research report.

¹⁹ See Canberra Times: [This link](#) and Yahoo! News: [This link](#).

²⁰ See <https://education.qld.gov.au/schools-educators/other-education/home-education/registration>.

²¹ Noting that the transitional arrangements in the new s555 inserted by clause 117 seem to make it clear that children registered for home education before commencement will be subject to the new requirements, including the amended s217 in Chapter 9, Part 5, Division 4.

(which refers to a 'high-quality education') and Tasmania (which refers to 'prescribed standards').²² However, this does not evidence any actual need to improve the quality of home education programs in QLD. It also confirms that QLD is not the only jurisdiction to adopt a 'high-quality education' approach.

HEA has reportedly also pointed out that the mandate could lead to more parents taking homeschooling "underground", meaning their children would not be registered with the regulatory body.²³ Media sources have also discussed how more regulation risks further disenfranchising families and could lead to a rise in unregistered students. There are reportedly believed to already be "thousands" of illegally unregistered home educated students,²⁴ which is concerning enough without any increase. If this occurs, the Bill would have a counter-productive effect in its aim to enhance the regulation of home education.

We recommend the Government omit the sections of the Bill which prescribe home education programs.

4. We are open to some of the other relatively minor amendments in the Bill to home education regulation, but oppose the strengthening of parent reporting requirements because existing provisions are sufficient. We also query whether the separate time-limited provisional registration application process should be retained, as it seems of potential benefit to parents.

Strengthening parent reporting requirements

The amendments will have the effect of strengthening parent reporting requirements by clarifying that "the annual report must provide evidence of the educational progress of the registered child", and requiring that "where an application for registration is made within 12 months of the child's previous registration ceasing for any reason – the application must be accompanied by a written report evidencing the educational progress for the child during the previous registration".²⁵ This is achieved by clauses such as 61 and 68 of the Bill. Clause 68 also contains amendments to clarify that the written report is to be "for the period the child is registered for home education", and "in relation to each subject or learning area that is part of the educational program used for the child's home education".²⁶

While we are relatively less concerned about these aspects of the Bill, they would make parent reporting more onerous. As the SOC points out, they may even impinge on the right to privacy and reputation.²⁷ In our view, it is sufficient that parents are already required by s217 to give to the chief executive a written report on the educational progress of the child while undertaking home education. It seems unnecessary for them to more particularly provide "evidence satisfactory to the chief executive that demonstrates the educational progress" under clause 68, particularly as they are already required to ensure that their child is receiving a high-quality education, and also given the additional proposed requirements discussed above regarding educational programs. There is no evident need to increase the burden on parents of home educated children in this way. To also specifically require that the report must be in relation to each subject or learning area only adds to our concerns. That seems a significant increase in parent reporting requirements and we are not aware that any identifiable problem exists in this area.

We recommend the Government omit the sections of the Bill which strengthen reporting requirements.

²² See page 25 of the Explanatory Notes. It also states that jurisdictions requiring that home education meet their approved curriculum requirements "tend to rely on the Australian Curriculum or learning areas associated with the Australian Curriculum, or require alignment with their own curriculum (which across all jurisdictions is based on the Australian Curriculum)."

²³ See Canberra Times: [This link](#) and Yahoo! News: [This link](#).

²⁴ See ABC News: <https://www.abc.net.au/news/2024-01-22/homeschool-surges-queensland-post-pandemic-restrictions/102015880>.

²⁵ See Pages 8 and 36 of the Explanatory Notes.

²⁶ See page 37 of the Explanatory Notes.

²⁷ See page 15 of the SOC: <https://documents.parliament.qld.gov.au/tp/2024/5724T308-00A0.pdf>.

Removing the separate time-limited provisional registration application

The Bill²⁸ removes the separate time-limited provisional registration application. The Explanatory Notes say this provides “for a single and simplified home education registration process with the appropriate oversight”. It will also align QLD with the approach in most other states and territories, as all states have one application process and, apart from Tasmania, do not provide for provisional registration.²⁹

In our view, it may be preferable to retain the existing provisions, as provisional registration seems of potential benefit to parents. Currently, as a QLD Government website explains [here](#), parents are able to register their child for home education for a period of 60 days without providing a summary of the educational program or any reporting requirements.³⁰ We do not think this lacks “appropriate oversight” given that the time period is limited to just 60 days. However, the amendments will effectively require parents to now provide a summary of the educational program at the time of application for registration under s208 of the EGP Act. Though this may ensure the child “has immediate access to a high-quality program of education” as the Explanatory Notes point out,³¹ it also means that parents will no longer be able to apply for provisional registration even if they know they will only home educate for a short time.

In our view, the Government should consider retaining provisional registration application provisions.

Other proposed changes regarding home education

The Bill also proposes other changes regarding home education, including amendments with effects of:³²

- Removing registration certificates: Removing certificates of registration and associated obligations to reduce unnecessary regulatory burden for parents. The requirement to issue a certificate of registration to the applicant is replaced with a requirement for the chief executive to give the applicant a notice stating specified information, to ensure parents continue to have a written notice to evidence registration and conditions on registration.³³
- Extending the age eligibility: Extending the age eligibility to enable a child to be registered for home education until 31 December in the year the child turns 18, consistent with the schooling sector.³⁴ Effectively, clause 23 will extend the age of a child who is eligible for registration by 12 months.³⁵
- Prescribing new timeframes for internal reviews: Prescribing timeframes for internal review processes related to home education decisions by removing the reference to “school” days, in order to avoid unnecessary delays on decisions, given the home education sector is not restricted to school terms.³⁶ The Explanatory Notes state that the new timeframes specified (45 days and 60 days respectively) are approximately equivalent to the timeframe given for an application for review of a decision, or a review decision thereof, that do not relate to home education.³⁷
- Removing the requirement for statutory declaration verification: ‘Streamlining’ the home education registration application process by amending s208 to remove the requirement for information in, or accompanying, an application for home education registration to be verified by a statutory declaration, and also amending s211 to omit the provision for the chief executive to require requested information or documents to be verified by a statutory declaration.³⁸
- Reducing response time for further information/documents: Amending s211 in other ways, such as to set the minimum period in which an applicant must give further information or a document requested by the chief executive for deciding an application at 14 days (rather than the current 28

²⁸ This is apparently achieved by clauses such as 23, 24, 27, 56, 57, 58, 59, 60 (in particular), 62, 64, 66, 73 and 112 of the Bill.

²⁹ See page 8 of the Explanatory Notes. See also pages 25 and 26 of the Explanatory Notes.

³⁰ See <https://education.qld.gov.au/schools-educators/other-education/home-education/registration>.

³¹ See Page 8 of the Explanatory Notes.

³² See Page 8 of the Explanatory Notes.

³³ See Pages 8 and 36 to 37 of the Explanatory Notes. This is apparently achieved by clauses such as 65, 67, 69, 70, 71 and 72 of the Bill.

³⁴ See Page 8 of the Explanatory Notes.

³⁵ See page 31 of the Explanatory Notes. This is apparently achieved by clauses such as 23 and 25 of the Bill.

³⁶ See Page 8 of the Explanatory Notes. This is apparently achieved by clauses such as 106 and 107 of the Bill.

³⁷ See page 42 of the Explanatory Notes.

³⁸ See page 36 of the Explanatory Notes. This is apparently achieved by clauses 61 and 63 of the Bill.

days), and apparently also to only allow the chief executive to extend the period for the applicant to comply with a request to provide such within the initial period set by the chief executive.

- Reducing the timeframe for application decisions: Reducing the time period in s215, from 90 days to 45 days, for when a failure of the chief executive to decide an application for the registration of a child for home education is taken to be a decision to refuse to grant the application.³⁹

We are less concerned about these aspects of the Bill, particularly the amendments which have the apparent intent of reducing unnecessary regulatory burdens on parents and extending the age eligibility for home education registration. We also acknowledge that the Explanatory Notes state that some of these changes will bring QLD into line with the regulatory approach in most other states and territories.⁴⁰ At this stage, we do not oppose these changes, but do particularly question the need to reduce and limit the relevant timeframes as they relate to parents at least, potentially making compliance more difficult.

5. At this stage, we do not comment on the other amendments regarding school education, except to oppose ‘modernising’ the EGP Act to remove any ‘gendered language’. This is unnecessary and inappropriate given different views on gender in modern society.

The Bill’s policy objectives include amending the EGP Act and other legislation to ‘modernise’ education services by removing the use of ‘gendered language’ and acknowledging “wellbeing, inclusion and diversity”.⁴¹ The Bill apparently achieves this by:⁴²

- Amending the Guiding Principles with a “commitment to an inclusive and equitable state education system”. In particular, clause 18 of the Bill amends s7(b) of the EGP Act so that education should be provided in a way that “promotes an inclusive, safe and supportive learning environment”.
- Amending nomenclature in the EGP Act, as many sections of it currently use ‘gendered language’ by referring to he, she, his, him or her.⁴³ The Bill amends such sections in Schedule 1 Part 1 to remove or replace the ‘gendered language’.⁴⁴ For example, the reference to ‘his or her’ in s5(1)(a)(i) and the reference to ‘him or her’ in s5(1)(a)(ii) are both replaced with ‘child or young person’.⁴⁵

We have some reservations about the proposal to vaguely acknowledge ‘inclusivity’ in the Guiding Principles, given that ‘modern’ interpretations of this concept are often underlaid by gender affirmative models that do not accord with a Christian worldview. These reservations seem warranted in light of the Bill’s further proposal to amend nomenclature in the EGP Act, which we specifically oppose at least.

The Explanatory Notes term these “minor and consequential amendments”⁴⁶ but we consider them significant in light of our strong convictions regarding gender. In particular, AIG is a Christian ministry which advocates for an understanding of gender based on the authority of the Christian Bible. We publish many articles relating this topic.⁴⁷ In summary, AIG’s view is that God only created two binary genders, male and female (although a very small percentage of the population do have gender/sex abnormalities such as intersex chromosomal disorders), and that gender is not separable from biological sex. This is clear from a medical and scientific perspective – our biology confirms God’s design of gender/sex in the Bible. As such, AIG rejects that gender can be fluid, chosen, based on a person’s subjective feelings about their gender, or changeable in any way including by a person identifying as another gender or undertaking hormonal or

³⁹ See page 36 of the Explanatory Notes. This is apparently achieved by clause 66 of the Bill.

⁴⁰ See pages 25 and 26 of the Explanatory Notes. Including removing the certificate of registration; and providing for time periods to be expressed in days rather than “school” days.

⁴¹ See Page 1 of the Explanatory Notes.

⁴² See pages 11 and 30 of the Explanatory Notes.

⁴³ Listed as 5(1)(a)(i), 5(1)(a)(ii), 5(2)(d), 7(b), 75(3), 124(1)(b), 168(4), 182(5), 330(3), 386(3), 387(6), 387(9), 421(1), 424(2), 425(2) and 426(4)(e).

⁴⁴ See page 166 onwards of the Bill.

⁴⁵ See page 11 of the Explanatory Notes.

⁴⁶ See page 51 of the Explanatory Notes.

⁴⁷ For example, see <https://answersingenesis.org/family/gender/biology-gender/>, <https://answersingenesis.org/family/gender/transgenderism-attack-on-image-of-god/>, <https://answersingenesis.org/family/gender/male-and-female-his-image/> and/or <https://answersingenesis.org/family/gender/gender-in-culture-cutting-through-chaos/>.

surgical treatments. AIG advocates that biological sex is a core part of how humans were created and that both sexes have important roles. AIG encourages Christians to contend in public for these Biblical truths.

While some Australians may not agree with AIG's views, there is no need to amend the EGP Act to remove 'gendered language' in any case. The Explanatory Notes allege that the use of such language "does not align with contemporary practice and approaches to gender and sex", and that the amendments reflect "current policy and practice" and result in "clarity and accuracy".⁴⁸ However, many Australians, religious or otherwise, do not agree with gender fluidity ideology. Biological views regarding gender and sex have existed throughout history. Many conservative and religious communities and other modern Australians continue to hold them today. These changes only reflect one view of current policy and practice reflective of modern gender fluidity ideology, not a view which is based on a proper scientific/medical perspective.

In any case, the passage of legislative amendments is not the place for political activism on this topic. It is inappropriate to use amending legislation as a vehicle to promote one particular view of gender when such different views exist as a matter of ongoing debate across modern society. As such, we recommend that the Government omit those sections of the Bill which remove 'gendered language' in the EGP Act.

⁴⁸ See page 11 of the Explanatory Notes and page 19 of the Explanatory Notes.