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Submission to the Joint Standing Committee on Foreign Affairs, Defence and Trade regarding their Inquiry into the status of the human right to religion or belief

Summary

The Victorian Multicultural Commission (VMC) welcomes the opportunity to make a submission to the Inquiry. We are the primary conduit between multicultural communities and government and through the establishment of the state-wide Multifaith Advisory Group (MAG) one of the main links between our Multifaith and Religious communities to government.

The VMC provides independent advice to the Victorian Government, operating under its remit, as outlined under the *Multicultural Victoria Act 2011*. The successful functioning of Victoria's unique multicultural multifaith society remains one of our state's greatest assets and strengths. The VMC Chairperson has declared that the 'diversity of our multifaith community has become one of the highest priorities of the VMC's work'.ⁱ

Multiculturalism is also acknowledged at the highest levels as one of our most successful contemporary public policies.ⁱⁱ As a policy of recognition and equity, multiculturalism complements the ethos, standards and obligations contained in the various international instruments on cultural, linguistic and religious diversity.ⁱⁱⁱ The United Nations *Declaration on the Rights of Persons Belonging to National or Ethnic, Religious and Linguistic Minorities* considers the protection of the rights of ethnic, religious and linguistic minorities as contributing to the political and social stability of the States in which they live. This speaks to the ability of the modern state to be socially cohesive through acknowledgement of cultural and religious difference. It positions the realisation of these rights as an important part of the development of any society.^{iv}

Our national commitment to multiculturalism has been challenged through progressively diverse patterns of migration. As the range of source countries for new migrants expands, our national cultural and religious diversity duly increases, creating a tension in the relationship between justice and security. An aspect of this inquiry therefore relates to its ability to examine hard questions relating to the intersection of multiculturalism and multifaith with issues of democracy, human rights, and regional security.

The VMC appreciates this opportunity to contribute to the national dialogue on human rights. Our submission includes information gained directly from communities through our consultations and stakeholder engagement, regional advisory council members, VMC Commissioners, and VMC research projects.

The focus of our submission relates to:

- the strength of multiculturalism as a means to progressively extend human rights norms,
- the limited protection for the human right to freedom of religion or belief under Australia's domestic law, and
- the balance between religious freedom and the right to equality and non-discrimination.

Introduction

Victoria is a national leader at the forefront of human rights protections in Australia. The *Charter of Human Rights and Responsibilities Act 2006* (Vic) protects the human rights of all Victorians, including religious and cultural freedoms. Victoria's anti-discrimination law, the *Equal Opportunity Act 2010* (Vic), protects people from discrimination and harassment in areas of public life, including victimisation or vilification due to a person's race or religion. The *Racial and Religious Tolerance Act 2001* (Vic) (the Act) promotes racial and religious tolerance by prohibiting certain conduct involving the vilification of persons on the ground of race or religious belief or activity and provides a means of redress.

The aim of the Act is to promote full and equal participation of every person in a society that values freedom of expression and is an open and multicultural democracy.^v Vilifying conduct is contrary to democratic values because of its effect on people who, as a result of being vilified, feel isolated from the community and may be less likely to participate in the community as a result.^{vi}

Protection of that right is limited however, under Australian domestic law, despite our international legal obligation. Democracy, based on the rule of law, is ultimately a means to achieve security, economic and social progress and development, and respect for human rights.^{vii} The Australian Constitution (s.116) provides partial protection by restraining the legislative power of the Commonwealth. There is also some protection against discrimination or religious vilification on the basis of religion in federal law (the *Racial Discrimination Act 1975*, and the *Fair Work Act 2009*).

Victoria's demographics are reflective of the state's multicultural and multifaith make-up. First insights from the 2016 Census reveal that, while the 'typical' Australian's parents were both born in Australia, at least one of the 'typical' Victorian's parents was born overseas.^{viii} This also demonstrates the increasing diversity of communities within Victoria. In 2011 and 2006, the 'typical' Victorian's parents would have both been born in Australia.^{ix} While initial census insights provide information on the 'typical' Australian, it also demonstrates that there is nothing typical about Australians diverse communities. In terms of overseas migration to Victoria it is important to note that migrants are overwhelming young when compared to the Australian population.^x (Please refer to **Appendix 1** for further detail.)

Victoria's religious affiliation statistics also provide an indicator of cultural identity and ethnicity. 66.8% of the Victorian population nominated a religion (compared with 68.3% for Australia), while 24% said they had no religion (compared to 22.3% for Australia). Growth areas related to Western (Roman) Catholic (+73,209 persons), Islam (+43,487 persons), Hinduism (+40,854 persons), and Buddhism (+36,166 persons).^{xi}

Victoria's deep commitment to multiculturalism is guided by the Principles of Multiculturalism set out in the *Multicultural Victoria Act 2011* (Vic), Section 4. Religious diversity is encompassed within the terms 'diverse' and 'diversity', defined in Section 3. Principles relevant to this submission are:

- a) *all individuals in Victoria are entitled to mutual respect and understanding regardless of their diverse backgrounds;*
- b) *all individuals and institutions in Victoria should promote and preserve diversity within the context of shared laws, values, aspirations and responsibilities; and*
- g) *all individuals and institutions should recognise Victoria's diversity as an asset and a valuable resource benefiting Australia.*

The Victorian Government Multicultural Policy Statement (2017) acknowledges that Victoria's diversity is our greatest strength, and encourages the whole community to recognise this.^{xii} Victoria's policy approach is to assist people with diverse backgrounds to successfully participate and contribute to our state. This entails a commitment to all Victorians that they are able to 'express their own unique cultural and religious identity with dignity, confidence and safety'.

Responses to Terms of Reference

1. The enjoyment of freedom of religion or belief globally, the nature and extent of violations and abuses of this right and the causes of those violations or abuses.

Victoria is a multicultural multifaith migrant destination. Therefore, the VMC deals with the aftermath of atrocities and violations committed overseas when migrants (including skilled and humanitarian entrants) arrive in Victoria traumatised from pre-settlement experiences. For example, young women from the local Assyrian community told the VMC how much they value religious freedom as an important human right. It is these aspects we want to bring before the Inquiry in this submission.

The VMC has held a number of roundtable discussions with the Assyrian community in Victoria. The resilience of the community, through shared experiences of genocide, pain, and suffering prior to re-settlement in Victoria, is remarkable. Many fled to neighbouring countries to escape persecution from Sunni and Shiite militias during the Iraq War and, more recently, by ISIS. The VMC has learned that family and friends remaining overseas continue to face faith based persecution living in volatile situations, without access to employment or education, and suffering financial hardship and exploitation.

Our Victorian Assyrian communities also continue to suffer through feelings of empathy and understanding for their community and loved ones overseas who are still experiencing human rights abuses, while they themselves have found safe refuge. They feel a deep responsibility (sometimes referred to as 'survivor guilt'), and do what they can to assist including raising funds to send small teams to visit their people in camps and neighbouring countries. The UNHCR confirms that 640,000 Syrians fled across the border into Jordan, the majority escaping with little more than the clothes they were wearing.^{xiii} Sending assistance overseas places additional financial pressure on families and the community here, and impacts upon their own settlement experience.

Thus, the VMC is acutely aware that the potential for human rights abuses increases with so many displaced people on the move across the globe. The United Nations High Commissioner for Refugees (UNHCR) confirms that 65.3 million people were forcibly displaced worldwide in the past 12 months. 53% of refugees worldwide came from three countries – Somalia (1.1m), Afghanistan (2.7m) and Syria (4.9m).^{xiv} In 2016 Victoria settled 10,131 individuals on the Bridging Visa E (BVE) program, with many emanating from these areas of conflict.^{xv}

Unfortunately, abuses of the human right to freedom of religion or belief can continue on Australian soil, through vilifying conduct. For example, Muslim communities regularly report instances of ‘Islamophobia’ to the VMC, especially involving women and young girls facing abuse in public places and on public transport due to religious visibility (i.e. wearing hijab or burqua). This same religious visibility also has negative impacts when endeavoring to gain and maintain employment.

The VMC has learned through its consultations with Muslim communities that it is important to counter damaging narratives, such as ‘Islamophobia’. Muslim residents have told the VMC that ‘fear of the unknown brings out Islamophobia’ and that media sources spread these ‘negative stories’. We need also to be mindful of religious freedom abuses that arise through systemic discrimination. For example, according to Muslim tradition, bodies must be buried as quickly as possible, preferably before sundown, shrouded in a cloth and facing Mecca. Some communities face barriers when seeking to conduct traditional Muslim burials, and the community’s religious requirements can also be ignored when autopsies are necessary.^{xvi}

The importance therefore of ‘healthy open dialogue’, raised at a recent VMC community consultation, cannot be overstated. The VMC regularly informs the public discourse as a means to inform the broader community on interfaith and intercultural matters. It is also a means to display solidarity with our multicultural communities who have suffered through violations or abuses that curtail or have curtailed their human right to freedom of religion or belief. Our work in Victoria is to actively engage in order to promote healthy open debate through regular media representations and at a wide variety of community engagements.

Recommendation

The VMC recommends that the Inquiry considers:

- *how to better support and aid migrants who are dealing with the aftermath of atrocities and violations committed overseas on arrival in Australia; and*
- *building capacity through a strong national narrative that supports a socially cohesive multicultural multifaith discourse promoting enjoyment of the human right to freedom of religion or belief.*

2. Action taken by governments, international organisations, national human rights institutions, and non-government organisations to protect the freedom of religion or belief, promote religious tolerance, and prevent violations or abuses of this right.

Multiculturalism offers strong leverage to extend human right norms through the promotion of religious tolerance and informing policy debates on violations and abuses. Despite successive Australian multicultural policies there is no legislation which enshrines multiculturalism in the

Australian context. As an example, the *Canadian Multiculturalism Act 1988* contains human rights freedoms, including religion.

WHEREAS the Constitution of Canada provides that every individual is equal before and under the law and has the right to the equal protection and benefit of the law without discrimination and that everyone has the freedom of conscience, religion, thought, belief, opinion, expression, peaceful assembly and association and guarantees those rights and freedoms equally to male and female persons. [Preamble to the Canadian Multiculturalism Act 1988]

The VMC plays a key role in protecting religious freedom and promotes religious tolerance by promoting participation, understanding, cohesion and harmony across Victoria. The VMC actively promotes intercultural and interreligious dialogue through a number of channels, that include interfaith, community events celebrating religious diversity, regular community consultations and religious roundtables. The VMC promotes the dialogue of inclusion and belonging, and conducts independent research as mechanisms to strengthen multiculturalism and extend human rights.

For example, the VMC was a founding member of the Victorian Government Multifaith Advisory Group (MAG) in 2008. The MAG facilitates regular dialogue between the Victorian Government and the state's faith leaders and community leaders. An annual multifaith service at Rod Laver Arena provides opportunity for broader participation, and brings Victoria's faith communities together.

Existing mechanisms, such as the MAG interfaith dialogue, are also helpful in building relationships between religious organisations. The network plays a role in seeking to ensure that individuals and communities are not discriminated against or maligned because of their faith. The MAG also supports religious inclusion and social cohesion at a state level.

In 2016 the VMC conducted a research project in Bendigo to better understand local community attitudes and inform positive multicultural engagement programs following anti-mosque protests. The protests began initially against a Greater Bendigo City Council planning decision, to issue a permit to the Australian Islamic Mission to build a local mosque. Through the research the VMC was able to support Council's democratic decision-making, to promote the benefits to the community of the development, and to support intercultural understanding in Bendigo.

The nature of the anti-mosque/anti-Islamic protests in Bendigo were qualitatively different from other contentious planning scenarios because they comprised a mass mobilisation of individuals and political groups against a particular group of people in society. The protests extended beyond the scope of planning decision-making by aiming to exclude Muslim people from experiencing the same rights and freedoms as others in Australian society to practice their faith.

The *Charter of Human Rights and Responsibilities Act 2006* (Vic), especially section 14, guided decision-makers throughout the process including to the Victorian Court of Appeal, who held that the human rights of the proposed users of the mosque were relevant to the making of the decision.^{xvii}

Under Victoria's town planning framework, a place of worship does not discriminate between religions. All faiths are entitled to facilities and services to meet their needs, including places of

worship to practise their faith.^{xviii} The VMC supported this assessment and visited Bendigo to provide support for the community through a particularly difficult period.

Key findings of the research related to the social impacts of the protests on the community of Greater Bendigo. The research identified the need for strong and authoritative leadership to facilitate healing within the community and to provide direction for the multicultural future of Bendigo, especially religious freedom. Developing social infrastructure, such as a place of worship, emerged as a public good however, whether the building has a spire, minaret or dome, it is for the benefit of all in the community.

Notwithstanding the social impacts of the protests, the Bendigo mosque development opened up space for vibrant debates on the politics of diversity, especially around notions of religious freedom, democracy, leadership, social networks and information sharing. Despite the negativity of relations during the time of the protests, greater intercultural understanding has emerged. Events also enabled people to gain a better understanding of how some people have to live their lives under pressures of discrimination and racism.

The VMC also actively promotes interfaith dialogue through community events that celebrate religious and faith based festivals, events vital in their ability to create bridges between cultures. Each year the VMC brings diverse communities together for a week of intercultural celebration during Cultural Diversity Week. The week provides all Victorians with an opportunity to celebrate our shared cultural, linguistic and religious diversity. The week also marks the United Nations Day for the Elimination of Racism and affirms the VMC belief in the human right to cultural and religious freedoms for all Victorians.

The VMC promotes the ability for people to share their cultural and religious heritage, especially in terms of building understanding, trust and respect.^{xix} Community consultations have provided a measure to gauge the VMC's work in this area. For example:

- The Assyrian community reported a strong interest in organising community events, cultural, religious and sporting activities where the community can come together for enjoyment and to support each other.
- Young people at Shepparton from Iraqi, Afghani and Iranian communities suggested that 'celebration, festival, sharing, clothes and food, to promote awareness of learning about other cultures' foster understanding and inclusion. The literature supports their view, describing the values expressed in public events as being reflective of an openness and general invitation to belong.^{xx}
- Promoting social cohesion in Bendigo will continue to be a priority for the VMC through fostering inclusive events and social gatherings as a means of positively engaging community members in intercultural conversations.

Recommendation

The VMC recommends that the Inquiry considers:

- *developing a multicultural act at the federal level that enshrines multiculturalism in the Australian context; and*

- *resourcing the Australian Intercultural Council (DSS) to further consider their role of strengthening interfaith dialogue and opportunities to do so in contemporary Australia, bearing in mind the increased religious diversity which makes 'interfaith dialogue harder but more important'.*^{xxi}

3. The relationship between the freedom of religion or belief and other human rights, and the implications of constraints on the freedom of religion or belief for the enjoyment of other universal human rights.

Democratic rights and human rights are wholly intertwined. Australia's democracy has core defining values that include:

- freedom of election and being elected;
- freedom of assembly and political participation;
- freedom of speech, expression and religious belief;
- rule of law; and
- other basic human rights.^{xxii}

Thus, religious freedom is integrally linked to the enjoyment of democratic rights, as well as other human rights. The issue is also one of balance. Freedom of religion or belief interacts with other fundamental freedoms including freedoms of thought, conscience, speech and association, as well as property rights.^{xxiii} Any right that might intersect with religious freedom therefore, must be carefully balanced against this freedom so that neither is privileged and does not impair the enjoyment of the other.^{xxiv}

Policies and initiatives that are firmly grounded in human rights are essential to ensuring the inclusion of individuals or communities that are vulnerable and or disadvantaged.^{xxv} Engaging communities and empowering young people are important strategies in seeking to ensure that balance is achieved. The VMC has found that constraints to religious freedom felt by individuals and groups manifest in discrimination and bias which in turn affects enjoyment of democratic, social, cultural and economic rights.

Together with the Victorian Equal Opportunities and Human Rights Commission (VEOHRC), the VMC recently co-hosted a roundtable discussion with key community stakeholders in the multicultural sector on the nature of racism and discrimination in Victoria. Findings from the consultation included information about religious visibility which affects Victorians of all ages and cultures in public places, at places of worship, and in labour markets and workplaces. Islamic women are particularly visible and their personal security is violated.^{xxvi} Rights to liberty and security of person can be infringed when religious visibility, an aspect of religious freedom, is violated.

The VMC works to challenge these racist and faith related incidences which infringe the human rights of sub-groups. We do this by engaging in public discourse to counter the narratives of religious hatred, seeking to introduce balance and better inform the discourse. The VMC Chairperson engages regularly in public discourse on key and often contentious issues affecting our multicultural communities through written editorials, and regular mainstream media appearances. More recently,

the majority of media requests have focused on issues affecting members of our Muslim community, such as the perception expressed by a community leader ‘that you cannot be a devout practising Muslim and Australian citizen’, and that ‘Sharia law threatens Australian values and laws’.

Recently, leaders from the Islamic community asked for a facilitated public debate on ‘Islamophobia’ where they could engage in an open public forum to express their views and challenge existing perceptions relating to their faith. The VMC Chairperson approached the Australian Broadcasting Corporation ABC requesting a dedicated segment on ABC Radio Melbourne’s Conversation Hour with Jon Faine, to discuss freedom of religion. The discussion resulted in an unprecedented number of talkback callers expressing negative views, demonstrating the further need for more balanced open public discourse and leadership.

The importance of strong leadership cannot be underestimated therefore in human rights debates. In this respect the VMC is supportive of the Australian Human Rights Commission (AHRC) view that the inquiry gives consideration to a mechanism for ensuring an appropriate balance is maintained between the right to freedom of religion and other human rights.^{xxvii} Narrow protections at the Federal level could be addressed through Human Rights and Anti-Discrimination legislation as proposed in 2012. We agree with the AHRC that this could be an instrument for ensuring an appropriate balance, at the national level between freedom of religion or belief and other human rights.^{xxviii}

Recommendation

The VMC recommends that the Inquiry considers:

- *driving productive diversity through the Australian Intercultural Council as a means to address barriers to employment and experiences in workplaces, especially in relation to matters of religious freedom; and*
- *developing Human Rights and Anti-Discrimination legislation as proposed in 2012, as a means to ensure an appropriate balance, at the national level between freedom of religion or belief and other human rights.*

Appendix 1

The following tables cover the Settlement Date range from 1 January 2016 to 31 December 2016.

Age of Permanent Settlers (All Streams)

The table below demonstrates the younger age profile of migrants to Australia. By comparison the Australian Bureau of Statistics (ABS) 2016 Census of Population and Housing demonstrates that the median age of the 'typical' Australian is 38 years.

Age	Migration Stream			Grand Total	% of Total
	Humanitarian	Family	Skilled		
00-05	4,864	4,423	21,203	30,490	11.6%
06-11	3,309	3,023	6,322	12,654	4.8%
12-15	1,795	2,516	2,453	6,764	2.6%
16-17	854	1,695	851	3,400	1.3%
18-24	2,677	19,372	37,708	59,757	22.8%
25-34	4,047	35,758	62,560	102,365	39.0%
35-44	3,243	9,134	14,641	27,018	10.3%
45-54	2,101	5,332	2,558	9,991	3.8%
55-64	1,178	5,228	315	6,721	2.6%
65+	784	2,158	68	3,010	1.1%
Grand Total	24,852	88,639	148,679	262,170	100.0%

Source: Australian Government, Department of Social Services, Settlement Data, 2017.

Top 10 Countries of Birth of Permanent Settlers (All Streams)

The table below demonstrates the two countries with the largest cohort of humanitarian entrants to Australia - Iraq and Syria - for the period 1 January 2016 to 31 December 2016.

Country of Birth [^]	Migration Stream			Grand Total	% of Total
	<i>Humanitarian</i>	<i>Family</i>	<i>Skilled</i>		
India	204	10,097	37,800	48,101	18.3%
China Peoples Rep	100	14,004	23,094	37,198	14.2%
Philippines	5	6,564	8,360	14,927	5.7%
United Kingdom	7	4,727	8,797	13,531	5.2%
Vietnam	5	6,327	2,614	8,946	3.4%
Iraq	8,142	458	83	8,683	3.3%
Pakistan	363	1,719	6,480	8,562	3.3%
Nepal	290	999	6,908	8,197	3.1%
Syria	7,397	245	120	7,762	3.0%
Australia**	215	122	5,665	6,002	2.3%
Other	8,126	43,377	48,757	100,260	38.2%
Grand Total	24,852	88,639	148,678	262,169	100.0%

Source: Australian Government, Department of Social Services, Settlement Data, 2017.

Top 10 Ethnicities of Permanent Settlers (All Streams)

The table below demonstrates the numbers in the humanitarian stream arriving in Australia from 1 January 2016 to 31 December 2016. The ethnicities highlighted all contain high numbers of minorities most often persecuted for their religious beliefs.

Ethnicity	Migration Stream			Total Settlers	% of Total
	<i>Humanitarian</i>	<i>Family</i>	<i>Skilled</i>		
Arab (NFD)	3,975	24	0	4,000	1.5%
Assyrian	3,608	0	0	3,608	1.4%
Syrian	3,163	5	0	3,168	1.2%
Iraqi	2,578	0	0	2,578	1.0%
Chaldean (Iraq)	1,987	0	0	1,987	0.8%
Hazara (Afghan)	1,382	0	5	1,387	0.5%
Karen (Burma)	983	0	0	983	0.4%
Chin (Burma)	785	0	0	785	0.3%
Armenian	611	0	0	611	0.2%
Nepalese	583	7	13	603	0.2%
Other	5,197	88,603	148,660	242,460	92.5%
Grand Total	24,852	88,639	148,679	262,170	100.0%

Source: Australian Government, Department of Social Services, Settlement Data, 2017.

Endnotes

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- ⁱⁱ Ozdowski, D. S. (2001, March 29). *Human Rights and Multiculturalism: Speech by Dr Ozdowski*. Retrieved April 4, 2017, from Australian Human Rights Commission: <https://www.humanrights.gov.au/news/speeches/human-rights-and-multiculturalism-speech-dr-sev-ozdowski-2001>
- ⁱⁱⁱ Kymlicka, W. (2007). *Multicultural Odysseys. Navigating the New International Politics of Diversity*. Oxford: Oxford University Press.
- ^{iv} Kymlicka, 2007.
- ^v Victorian Equal Opportunity and Human Rights Commission, What is the Racial and Religious Tolerance Act 2001? Retrieved 12 April 2017: <http://www.humanrightscommission.vic.gov.au/the-law/racial-and-religious-tolerance-act>
- ^{vi} Vilification is behaviour that incites hatred, serious contempt for, or revulsion or severe ridicule of a person or group of people because of their race or religion.
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- ^{ix} Ibid
- ^x Australian Government Department of Social Services, Settlement Reports 1 January 2016 to 31 December 2016. Retrieved 11 April 2017: <http://data.gov.au/dataset/8d1b90a9-a4d7-4b10-ad6a-8273722c8628/resource/1d07f86d-5e61-44f4-a2c4-227324ae6fb4/download/settlement-data-reports-january-to-december-2016.docx>
- ^{xi} ABS Census 2011
- ^{xii} Victorian Government. (2017, February). Victorian and Proud of it. Victoria's Multicultural Policy Statement. Retrieved March 30, 2017, from Victorian Multicultural Commission: <https://proud.vic.gov.au/wp-content/uploads/2017/02/Victorian-And-Proud-of-it-MPS-180207.pdf>
- ^{xiii} The UN Refugee Agency, Australia for UNHCR, Get the facts about our impact. Retrieved 11 April 2017: <https://www.unrefugees.org.au/emergency-response/syria/>
- ^{xiv} UNHCR, 2017. Retrieved 4 April 2017: <http://www.unhcr.org/en-au/figures-at-a-glance.html>
- ^{xv} Australian Government Department of Immigration and Border Protection, *Onshore Processing Statistics*. Retrieved 4 April 2017: <https://www.border.gov.au/ReportsandPublications/Documents/statistics/ima-bve-dec-16.pdf>
- ^{xvi} Ozdowski, 2001.
- ^{xvii} *Hoskin v Greater Bendigo City Council* [2015] VSCA 350
- ^{xviii} *Rutherford & Ors v Hume CC* (includes Summary) (Red Dot) [2014] VCAT 786
- ^{xix} Victorian Government, 2017.
- ^{xx} Allen, M., Spandler, H., Prendergast, Y., & Froggett, L. (2015, March). Landscapes of helping; Kindliness in neighbourhoods and communities. Retrieved March 31, 2017, from Joseph Rowntree Foundation: <https://www.jrf.org.uk/report/landscapes-helping-kindliness-neighbourhoods-and-communities>
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- ^{xxii} The Democratic Audit of Australia, Museum of Australian Democracy, Old Parliament House, Canberra. Retrieved 6 April 2017: <https://moadoph.gov.au/democracy/democratic-audit/>
- ^{xxiii} Australian Human Rights Commission, 2015.
- ^{xxiv} Australian Human Rights Commission, 2015.

^{xxv} United Nations General Assembly, Seventieth session Agenda items 16 and 117, *Culture of peace*, The United Nations Global Counter-Terrorism Strategy, 24 December 2015.

^{xxvi} Victorian Multicultural Commission, 2015.

^{xxvii} Australian Human Rights Commission, 28 February 2017, Submission into the status of the human right to freedom of religion or belief (Sub.12).

^{xxviii} AHRC, 2017.