

29 Faith communities

Introduction

Faith-based communities and organisations play an important role in the lives of many Victorians. These communities and organisations offer a vital opportunity to reach people who are affected by family violence, many of whom might not use formal family violence service pathways to seek help. It is therefore important that faith-based communities address barriers to the disclosure, prevention of or recovery from family violence and make it clear that religion cannot be used by perpetrators and others to condone or excuse abusive behaviour.

The first section of this chapter discusses evidence before the Royal Commission about the importance of faith communities in interacting with people affected by family violence; these communities are well placed to educate their members, influence attitudes and individuals' behaviours, respond to violence, provide support to victims, and facilitate referrals.

In its community consultations the Commission heard from leaders of a number of faith communities—as well as from women and from people working in the family violence field—about the support that faith communities can provide to people affected by family violence. The Commission also heard, however, that women experiencing family violence can face barriers to seeking help within their faith communities as a result of particular religious beliefs and practices.

The second section of this chapter outlines some of the issues leaders and members of faith communities raised. Spiritual abuse and the use of faith to support or condone violence are concerns in some communities. The Commission also heard that training for faith leaders in recognising and responding to family violence is inadequate. This lack of awareness of and knowledge about how to respond to disclosures of family violence limits communities' ability to support those experiencing such violence. Several examples of initiatives led by different faith communities, with the aim of preventing and responding to family violence, are also documented.

The chapter concludes with the Commission's views and recommendations relating to the need to facilitate and resource a multi-faith approach to improving information, training and responses to family violence in all faith communities and to ensure that family violence services take account of the needs of women from faith communities who seek their support.

Context and current practice

A wide range of faiths are practised by people in Victoria. In the 2011 census 67.7 per cent of Victorians indicated a religious affiliation. In terms of numbers, the most prominent faith communities are Western Catholic (26.6 per cent), the Anglican Church of Australia (12.3 per cent), the Uniting Church (4.7 per cent), Buddhism and Greek Orthodox (both 3.1 per cent) and Islam (2.9 per cent).

A comparison of census data for 2006 and 2011 reveals different trends for the top-ranking religions: the predominance of Christian faiths has declined slightly, whereas the number of Victorians of non-Christian faith has increased considerably. For example, the number of adherents of Buddhism increased by 27.1 per cent; the number of those adhering to Islam increased by 39.7 per cent; the number of Hindus increased by 96.5 per cent, and the number of Sikhs increased by 224.6 per cent.¹

Although there is no data on the prevalence of family violence in particular faith communities, anecdotal evidence suggests that such violence is causing increasing concern among those communities and their leaders.²

As noted in Chapter 28, both culture and faith can add complexity to a victim's experience of family violence and their ability to gain access to services. Importantly, however, the difficulties culturally and linguistically diverse communities and faith communities face are often distinct. People might share the same cultural practice yet come from different faith traditions.

The role of faith and faith-based responses to family violence was mentioned at a number of community consultations with women and people working in the family violence field and in submissions to the Commission. The comments predominantly related to the Christian, Jewish and Muslim faiths.

With the assistance of the Office for Multicultural Affairs and Citizenship, the Commission arranged a faith leaders consultation that was attended by representatives of the Anglican, Catholic, Jewish, Hindu, Muslim, Coptic Orthodox and Russian Orthodox communities.³ The consultation provided valuable insights into the experiences of faith leaders. All the leaders recognised that no faith community is immune from family violence by reason of their particular faith. The consultation also afforded the Commission an opportunity to hear about work being done in some communities to prevent and respond to such violence.

The importance of faith-based responses to family violence

Faith communities are 'vital settings' for dealing with family violence for a number of reasons:⁴

- ▷ They have an ability to reach and engage people who might not approach formal service providers in the family violence system.⁵
- ▷ They are places where people can go to find 'solace, meaning, comfort and support',⁶ and they can create supportive social networks for their members who are affected by family violence.
- ▷ They can provide education to their members about family violence.⁷
- ▷ Faith leaders occupy a position of authority in their community and have the ability to influence the behaviour of community members.⁸
- ▷ They can sensitively introduce ways of seeing the roles of men and women in society to members of their own communities, without being seen as 'outsiders'.⁹

Along with friends, family members and work colleagues, ministers of religion feature among the groups of people identified as the most common source of support following a woman's most recent physical assault by her cohabiting partner and in cases of assault generally.¹⁰

An international study commissioned by the United Kingdom's Department for International Development looked at the available literature and held consultations with a variety of experts from around the world on the topic of faith-based prevention and response activities. While noting that the existing literature primarily focuses on particular regions and particular religions,¹¹ the report stated:

The literature and experts agree ... that faith communities are present at grassroots level, all over the world, have existed for generations, are present before, during and after political unrest, and are insiders within the communities they serve. They are thus an integral part of a holistic response to SGBV [sexual and gender-based violence], able to carry out long-term interventions that aim to impact the root causes of SGBV. Particularly faith leaders, as moral authorities, have the potential to influence an entire community.¹²

In view of the authority faith leaders possess and the trust their communities place in them, these leaders are ideally positioned to influence community attitudes and provide strong leadership in relation to family violence:

The influential and respected position held by community and religious leaders provides an opportunity to foster genuine leadership on family violence, particularly in CALD communities. Religious leaders are in the unique position of being asked to provide spiritual guidance and support both to survivors and perpetrators of family violence.¹³

Our experience has shown that congregants who are victims of abuse often disclose to their rabbi; therefore, rabbis play a vital role in enabling vulnerable community members to move forward to create positive change in their lives and the lives of their families.¹⁴

Many faith-based organisations also deliver important services to victims and perpetrators of family violence through their community service agencies. In some instances, however, the beliefs of certain faith groups can become barriers to gaining access to those services.¹⁵

Faith-based initiatives

The faith leaders who participated in the Commission's consultation acknowledged that family violence is a problem facing all faith communities. They also agreed that much could be learnt from the experience of responding to family violence across faith traditions and by drawing on common teachings about compassion, respect and dignity.¹⁶ In relation to Islam, the Australian Muslim Women's Centre for Human Rights stated that the faith is 'a powerful and effective framework towards [family violence's] eradication'.¹⁷

Faith leaders spoke of the diversity that exists between and within faith communities and acknowledged the need to tailor responses to family violence to meet the requirements of their particular communities.¹⁸

Experience suggests that the most effective way of dealing with family violence in faith communities is on a faith-by-faith basis. Drawing on his experience working on the Northern Interfaith Respectful Relationships Project, Mr Scott Holmes, Project Manager, Health Promotion at YMCA Victoria, gave evidence that:

... it is probably much more productive to actually work from a faith by faith basis so that each of those faith traditions can be dealing with the issue in the context of their sacred text, their cultural backgrounds, their world views and so forth.¹⁹

A number of faith communities have been doing important work on preventing and responding to family violence. The Commission was told about the following initiatives:

- ▷ Anglicans Helping to Prevent Violence against Women, launched in October 2011, is a model of primary prevention that seeks to reduce the prevalence of violence by building a culture of equal and respectful gender relationships in Anglican organisations and local churches. The Anglican community has delivered active bystander training, peer mentoring and training in violence prevention in a number of parishes.²⁰
- ▷ The CHALLENGE Family Violence project, a partnership between the City of Casey, Cardinia Shire Council, the City of Greater Dandenong and Monash Health, provided training to local faith leaders and supported them in producing a resource entitled *Creating Equality and Respect: An Interfaith Collaboration on Preventing Family Violence*, which is designed to assist faith leaders in preventing family violence in their communities.²¹
- ▷ The Northern Interfaith Respectful Relationships project was a partnership between Darebin City Council and VicHealth and involved initiatives such as forums and workshops for faith leaders to raise awareness of family violence, production of a manual and tool kit, promotion of White Ribbon Day activities among the faith communities, and a peer mentoring program.²²
- ▷ In partnership with the Rabbinical Council of Victoria, the Jewish Taskforce Against Family Violence published *Will My Rabbi Believe Me? Will He Understand? Responding to Disclosures of Family Violence in a Rabbinic Context*, which is designed to help rabbis respond appropriately to disclosures of family violence.²³ The taskforce also provides training for rabbis about family violence and training to Victoria Police, Domestic Violence Victoria and maternal and child health nurses about Jewish cultural and religious traditions.²⁴ Faith leaders told us this training has been very useful in helping mainstream services respond more sensitively to Jewish women experiencing family violence.²⁵
- ▷ The Islamic Council of Victoria has assigned an imam to visit a different mosque each week to speak about family violence and stress that it is not acceptable.²⁶

Challenges and opportunities

This section outlines some of the challenges and other matters leaders and members of faith communities raised with the Commission and provides several examples of initiatives led by different faith communities with the aim of preventing and responding to family violence.

Faith leaders' views on family violence

In the majority of cases where women had sought assistance from faith communities in which the leaders, the commission was told the leaders were predominantly or exclusively men.

Some women received valuable support after they had disclosed family violence.²⁷ For example, one woman told us her priest helped her secure sole custody of her children and was of great emotional support to her, which was particularly important since she had no family in Australia.²⁸

For many women, however, the response was inadequate. The Commission heard that some faith leaders were uninformed and ill-equipped to respond to such disclosures: 'often the advice given wasn't helpful because the faith leader didn't know what kind of advice to give'.²⁹

My mother was repeatedly advised by elders in our church that she should stay with my father when she approached them for advice or when things at home had become intolerable.³⁰

At some point in our marriage I went to speak to our religious leader and ask advice about my husband's abusive behaviour. The religious leader advised me that perhaps if the house was cleaner when my husband got home, or if I cooked better, he might not be so angry. As a result of confiding to my religious leader, I was referred to a counselling service that advised me on how to be a more obliging and obedient wife.³¹

In other examples provided to the Commission, faith leaders colluded with perpetrators of family violence:

I was manipulated to stay within my marriage by five different ministers and respective congregations ... One church assisted my ex-husband to hide assets. Another minister phoned my friends and warned them to have nothing to do with me, [and] reveal where I was hiding. Another declared I was protected by God because I didn't die in the assault and to drop the AVO and return to my marriage because I married in sickness and in health, and he was only 'sick'. I was told I am my husband's property ... to be obedient so he wouldn't have to hit me, don't place demands, allow him to try and be a man, and be more loving etc, to the point of one congregation member coaching him in how to respond/act regarding psych evaluations and questioning ... I am gravely concerned about the lack of skills for lay ministers, counsellors and psychologist in the area of family violence counselling. One church-sponsored counsellor said 'Be gentle with him, he's trying to be a man'.³²

Some women felt pressured to remain in abusive relationships because of attitudes towards marriage and divorce:

[Family violence] was never, ever spoken of in my church. All that was spoken of was that a wife should submit to her husband. That women should submit to men. That women were not to speak in church. Not to lead prayer or deliver Scripture ... Divorce was considered unacceptable. Abuse was never spoken of so I have no idea whether it would have been an acceptable reason for someone to leave a marriage. I doubt that it would have been. Marriage vows were taken for better or worse. No matter what. You should just pray harder if things were difficult.³³

There was also a perception that ‘religious leaders simply reinforce the patriarchy’.³⁴ This view, which was expressed during the community consultations, has also been noted in recent research:

Most of the faith leaders are male and their reading and interpretation of holy scriptures often carry a decidedly patriarchal bias. Many participants argue that it is because there is an interweaving and cross-contamination of religion and patriarchal culture. Thus religion, and the way faith leaders interpret and teach it, echoes the patriarchal cultural ideas of male and female roles and power dynamics ... The way it is done actually at times facilitates and justifies [sexual and gender-based violence], for beliefs that justify and enable violence are preached and condoned. These include beliefs such as that wives should be submissive, and that women are the property of men.³⁵

In some faith communities the decision not to inform a secular authority of family violence is based on the stigma and shame associated with such a disclosure. The Commission heard that women can be pressured to ‘keep everything in the community’ and that if they seek outside help they are ‘shunned, stigmatised, isolated’.³⁶ One woman said that, although she was brought up to believe her faith leader would help in a time of crisis, she felt she could not turn to him because ‘if you spoke out you were committing a sin’.³⁷

The Casey Multi-Faith Network reported:

We have felt that faith communities often don’t want to be associated with issues related to family violence for fear of stigma or other such apprehensions. We have often found that faith communities want to brush such issues as family violence under the carpet and either do not want to deal with the problems, or want to hide them.³⁸

The Commission heard that in parts of the Jewish community there is ‘heavy reliance on keeping individual problems, such as family violence and child sexual abuse, within the community itself so as not to be seen to bring shame onto the community for exposing these problems to the non-Jewish community’.³⁹

Equipping faith leaders

The Commission heard that many faith leaders have received no training in dealing with family violence or were trained long ago. Mr Holmes noted during his evidence:

... the faith leader might think that they can care for both the victim and the perpetrator equally and not understand that there’s differences of power going on in those relationships and that they may not be the best person to care for both the victim and perpetrator, or indeed either, and need to refer elsewhere. So there is a role there to try to ensure that faith communities have best practice in terms of how to deal with their members who are experiencing family violence.⁴⁰

Some faith leaders were trained in countries where the understanding of relationships and gender roles was different from that in Australia.⁴¹ As a result of increased migration, some faith communities are now more culturally diverse, and faith leaders might not be properly equipped to understand the cultural practices of new communities aligned with a particular faith and where these practices might be misused. As was noted during the Commission’s consultation with faith leaders:

We also need to improve the cultural competence of the clergy to understand these issues [cultural dimensions of family violence, such as dowry]. Many clergy also come from other cultures and don’t fully understand what the issues are. More education and more opportunities for upskilling within the clergy are needed. We also need to have women in pastoral leadership roles as sometimes women won’t feel comfortable coming to a priest in what they perceive to be a very patriarchal system. Access to appropriate pastoral carers is really important.⁴²

In addition, a reluctance in some communities to discuss sex and related matters can inhibit discussion about sexual and family violence:

Addressing SGBV [sexual and gender-based violence] within and through faith communities is thus challenging, for one has first to deal with the refusal to even mention the topic. This refusal to mention or discuss SGBV often extends to the underlying causes of SGBV as well such as patriarchy, power and gender inequality.⁴³

Ms Joumanah El Matrah, Australian Muslim Women's Centre for Human Rights gave evidence about the importance of attitudes to gender equality among faith leaders and suggested this should be the focus of further training:

... while religious leaders may not agree with violence against women, a great number of religious leaders do see men and women as unequal and the idea of men being superior to women is one of the lead contributors to violence against women. Unless that shifts, no amount of support to them to eradicate violence is going to work.⁴⁴

Faith leaders also emphasised the importance of theological training to aid with contemporary interpretation of religious texts that might otherwise be seen to condone violent and controlling behaviour.⁴⁵

Using faith to support or condone the use of violence

The Commission heard that some men use faith to excuse their behaviour. Ms El Matrah gave evidence about the concept of 'spiritual abuse', which she explained as 'the use of religion to justify gender inequality and to justify violence against women'.⁴⁶ Spiritual abuse can occur in all faith communities and can include the following:

- ▷ using religion to dominate, exercise authority and claim superiority
- ▷ using someone's religious or spiritual beliefs to manipulate the person
- ▷ providing to someone incorrect religious information in order to promote the provider's own interests and needs
- ▷ preventing someone from practising their religious and spiritual beliefs
- ▷ ridiculing someone's religious or spiritual beliefs
- ▷ refusing a religious divorce.⁴⁷

The Commission heard that refusing a religious divorce is a particular concern in the Jewish and Muslim communities. Some men use their capacity to refuse a religious divorce as a means of manipulating or otherwise exerting control over women.

In the Orthodox Jewish community religious divorces are arranged by a rabbinic tribunal and entail the delivery of a divorce document called a *gett* from the husband to the wife.⁴⁸ Jewish Care Victoria told the Commission:

A woman who is refused a [gett] is referred to as an *agunah* (a chained woman). Gett refusal is often another form of abuse as it enables one party (the man) to exercise inappropriate power and control over the other. Without a [g]ett, the divorce is not recognised under Jewish law even if Australian courts grant the divorce.⁴⁹

If a man refuses to give his wife a *get*, she will be prevented from remarrying according to Jewish Law and from subsequently having children who can participate fully in the religious community.⁵⁰

In connection with the Muslim community, the Commission heard the following:

In some communities [polygamy] occurs more than others. They just get a second wife who is often from Australia too. It's just a religious marriage, after the first civil one. There's no way the first wife can challenge it. If the man doesn't want to give her a divorce she just has to live with it. The second wife doesn't have any rights either. It then sets up two women for abuse instead of one.⁵¹

Even having a civil divorce doesn't ensure the man will agree to an Islamic [religious] divorce ... Another woman got her Islamic divorce but now he has disappeared and she can't get her civil divorce.⁵²

Isolation from mainstream support services

As noted, faith communities can reach people who might not approach formal service providers in the family violence system. Women from some faith communities can feel isolated from mainstream services such as specialist family violence services, legal services and police. As described in Chapter 28, social isolation is a barrier for many women of culturally and linguistically diverse backgrounds. In the context of faith communities, the following are perceived barriers for women seeking access to mainstream services:

- ▷ lack of knowledge about their rights and about the service system as a whole—especially in communities that do not use mainstream media and communication networks
- ▷ reluctance to seek help outside their own community
- ▷ a belief that mainstream services are not sensitive to their needs and, in particular, that refuge and crisis accommodation will not provide for or support the continuation of their religious and cultural practices. For example, women might be concerned they will not be able to satisfy kosher dietary requirements in a refuge or continue to send their children to the same school and attend the same place of worship.⁵³

These barriers can force women to feel they must choose between their safety and their faith.⁵⁴

The way forward

Despite the challenges experienced in faith-based responses to family violence, faith settings are an integral part of the community response to family violence. Faith leaders and organisations have direct and influential contact with many members of the Victorian community, and their guidance and intervention are often sought when family violence is being experienced. The trust communities have in their faith leaders enables these leaders to play an important role in educating communities about family violence, reinforcing community standards in relation to respect, dignity and non-violence, and providing practical advice and assistance to people in need.

The faith leaders the Commission consulted demonstrated a strong commitment to addressing the family violence that occurs in their communities. They also acknowledged, however, that they and their colleagues and communities require assistance to understand how to prevent, recognise and respond appropriately. Training for faith leaders in recognising and responding to family violence is generally inadequate. This lack of awareness and knowledge of how to respond to disclosures of family violence limits their ability to support women experiencing such violence.

As was evident in the personal accounts the Commission received, some attitudes and practices, and inadequate or ill-informed responses by faith leaders, risk exposing victims to further and sustained abuse by their family members. Women experiencing family violence can face barriers to seeking help within their faith community because of particular religious beliefs (for example, about divorce or gender roles). These barriers can force women into making a choice between their safety and their faith.

The Commission welcomes the different initiatives by faith communities, as outlined above. These communities should be supported in strengthening and building on this work and be equipped to respond sensitively and appropriately to disclosures of family violence, to maximise victims' safety, to refer victims and perpetrators to relevant services, and to challenge violence-supporting attitudes and behaviours. Faith communities should consider how to record the existence of these programs and to regularly assess how well they are working.

The Victorian Multicultural Commission is established under the *Multicultural Victoria Act 2011* (Vic), and its functions include promoting full participation by Victoria's diverse communities in the social, cultural, economic and political life of the state and access by the state's diverse communities to services made available by governments and other bodies.⁵⁵ 'Diversity' is defined to include religious diversity, as well as cultural, racial and linguistic diversity.⁵⁶ The Commission notes the work done by the Victorian Multicultural Commission in developing responses to family violence.

The Office of Multicultural Affairs and Citizenship has a continuing role in supporting faith communities in Victoria, including supporting them in developing responses to family violence. It convenes the OMAC Multifaith Advisory Group, which facilitates continuing dialogue between the Victorian Government and Victoria's faith leaders and communities. The Advisory Group consists of about 25 senior representatives of Victoria's diverse faith communities—including various Christian, Jewish, Muslim, Sikh, Hindu, Buddhist and Baha'i communities.⁵⁷

The Victorian Multicultural Commission and the OMAC Multifaith Advisory Group are well placed to assist faith communities in their efforts to prevent and respond to family violence. In light of this, we make a recommendation for these bodies to work in partnership with family violence practitioners and women from faith communities to develop training packages on family violence and sexual assault for faith leaders and communities.

We also acknowledge the importance of mainstream family violence services understanding and being sensitive to people's religious and cultural needs. It therefore proposes that the recommended review of practice standards for specialist family violence services and men's behaviour change programs be informed by representatives of, and women from, faith communities.

Recommendation 163

The Office of Multicultural Affairs and Citizenship Multifaith Advisory Group and the Victorian Multicultural Commission, in partnership with expert family violence practitioners, develop training packages on family violence and sexual assault for faith leaders and communities [within three years]. These packages should build on existing work, reflect leading practice in responding to family violence, and include information about referral pathways for victims and perpetrators. The training should be suitable for inclusion as part of the pre-service learning in various faith training institutes, as well as the ongoing professional development of faith leaders.

Recommendation 164

The Department of Health and Human Services consult with the Office of Multicultural Affairs and Citizenship Multifaith Advisory Group, the Victorian Multicultural Commission and women from faith communities as part of its review of standards for specialist family violence service providers (including men's behaviour change programs), to ensure that these standards and the associated services take account of the needs of people in faith communities who experience family violence [within two years].

Recommendation 165

Faith leaders and communities establish processes for examining the ways in which they currently respond to family violence in their communities and whether any of their practices operate as deterrents to the prevention or reporting of, or recovery from, family violence or are used by perpetrators to excuse or condone abusive behaviour.

Endnotes

- 1 Office of Multicultural Affairs and Citizenship, 'Victoria's Diverse Population: 2011 Census' (2013).
- 2 Faith leader consultation, Melbourne, 2 September 2015.
- 3 A number of invitees from other faith communities were unable to attend the consultation on the day.
- 4 Transcript of Holmes, 10 August 2015, 2439 [26].
- 5 Jewish Taskforce Against Family Violence, Submission 820, 2.
- 6 Statement of Holmes, 26 June 2015, 13 [64].
- 7 See, eg, Anglican Diocese of Melbourne, Submission 173, 5–8.
- 8 Statement of Holmes, 26 June 2015, 13 [65].
- 9 Elisabet le Roux, 'A Scoping Study on the Role of Faith Communities and Organisations in Prevention and Response to Sexual and Gender-based Violence: Implications for Policy and Practice' (Stellenbosch University, Unit for Religion and Development Research, September 2015) 53.
- 10 Peta Cox, 'Violence Against Women: Additional Analysis of the Australian Bureau of Statistics' Personal Safety Survey, 2012' (Horizons Research Paper No 01, Australia's National Research Organisation for Women's Safety, October 2015) 113.
- 11 le Roux, above n 9, 7.
- 12 Ibid 8.
- 13 Brotherhood of St Laurence, Submission 818, 13, (citations omitted).
- 14 Jewish Taskforce Against Family Violence, Submission 820, 20.
- 15 For example, the barriers that can arise for lesbian, gay, bisexual, transgender and intersex people seeking to access these services are discussed in Chapter 30.
- 16 Faith leader consultation, Melbourne, 2 September 2015.
- 17 Australian Muslim Women's Centre for Human Rights, Submission 728, 11.
- 18 Faith leader consultation, Melbourne, 2 September 2015.
- 19 Transcript of Holmes, 10 August 2015, 2440 [21]–[25].
- 20 Anglican Diocese of Melbourne, Submission 173, 7. See also, Faith leader consultation, Melbourne, 2 September 2015.
- 21 City of Casey, Submission 354, 4; Borderlands Cooperative, 'Challenge Family Violence Project: Making Things Happen to Prevent Violence Against Women – Interim Evaluation Report (4), November 2014 to May 2015' (1 May 2015), produced by the State of Victoria in response to the Commission's Notice to Produce dated 5 June 2015.
- 22 Statement of Holmes, 26 June 2015, 14 [71]–[72], 15 [75].
- 23 Jewish Taskforce Against Family Violence, Submission 820, 2.
- 24 Ibid.
- 25 Faith leader consultation, Melbourne, 2 September 2015.
- 26 Ibid.
- 27 Department of Social Services (Cth), 'Hearing Her Voice: Report from the Kitchen Table Conversations with Culturally and Linguistically Diverse Women on Violence Against Women and Their Children' (September 2015) 36.
- 28 Community consultation, Melbourne, 6 May 2015.
- 29 Community consultation, Sandringham, 29 April 2015.
- 30 Anonymous, Submission 263, 1.
- 31 Statement of 'Jones', 13 July 2015, 2 [10].
- 32 Anonymous, Submission 230, 1.
- 33 Anonymous, Submission 200, 5.
- 34 Community consultation, Morwell, 13 May 2015.
- 35 le Roux, above n 9, 47–8.
- 36 Community consultation, Geelong 2, 28 April 2015.
- 37 Community consultation, Morwell, 13 May 2015.
- 38 Casey Multi-Faith Network, Submission 400, 2.
- 39 Jewish Care Victoria, Submission 761, 2.
- 40 Transcript of Holmes, 10 August 2015, 2439 [15]–[24].
- 41 Faith leader consultation, Melbourne, 2 September 2015.
- 42 Ibid.
- 43 le Roux, above n 9, 48.
- 44 Transcript of El Matrah, 11 August 2015, 2639 [31]–2640 [6].
- 45 Faith leader consultation, Melbourne, 2 September 2015.
- 46 Transcript of El Matrah, 11 August 2015, 2638 [12]–[14].
- 47 Australian Muslim Women's Centre for Human Rights, Submission 728, 12–13.
- 48 Jewish Care Victoria, Submission 761, 6.
- 49 Ibid.
- 50 Tayla Faigenbaum and Ann Wollner, Submission 484, 2.
- 51 Community consultation, Northcote 2, 6 July 2015.
- 52 Ibid.
- 53 Jewish Care Victoria, Submission 761, 2, 4.
- 54 Ibid 7.
- 55 *Multicultural Victoria Act 2011* (Vic) s 7.
- 56 Ibid s 3.
- 57 Victorian Multicultural Commission, *Consultative Structures* <<http://www.multicultural.vic.gov.au/projectsand-initiatives/promoting-harmony/consultative-structures>>.