

# **Submission on Review of the Victorian Change or Suppression (Conversion) Practices Prohibition Act**

24 March 2026

Submission of  
Te Kāhui Tika Tangata  
New Zealand Human Rights  
Commission



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Human Rights Commission on Review of the Victorian  
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## Introduction

1. Te Kāhui Tika Tangata New Zealand Human Rights Commission (**HRC**) welcomes the opportunity to make a submission to the Victorian Law Reform Commission on the review of the Victorian Change or Suppression (Conversion) Practices Prohibition Act (**Change or Suppression Act**) 2021.
2. The first part of this submission provides background information on the development, scope, and implementation of New Zealand’s Conversion Practices Prohibition Legislation Act 2022 (**CPPLA**).<sup>1</sup> The subsequent parts set out data and insights drawn from the HRC’s experience administering the civil response pathway, as well as additional sources of information relevant to conversion practices in Aotearoa New Zealand.

## Background

3. New Zealand’s Conversion Practices Prohibition Legislation Act 2022 followed years of community organising and advocacy. As detailed in the HRC’s 2024 *Insights Report*, public awareness and pressure for legislative reform grew significantly from 2018.<sup>2</sup> The New Zealand Labour Party formally adopted a policy to ban conversion practices in late 2020. After a petition to Parliament accelerated political action, a Bill was introduced in July 2021.
4. The Victorian Change or Suppression Act served as a model for New Zealand’s Bill. The similarities between the two are clear, including direct references to the Victorian legislation in sections 5 and 9 of the CPPLA. However, the Change or Suppression Act is significantly broader in scope than the CPPLA.
5. The level of public engagement on the New Zealand Bill was at the time unprecedented. Almost 107,000 written submissions were made to the Justice Select Committee—more than three times the number received for any other Bill in Aotearoa’s history up to that point.<sup>3</sup>
6. The HRC made a detailed submission, including 15 recommendations aimed at strengthening the Bill’s focus on survivors.<sup>4</sup> The HRC’s recommendations were not adopted in the Select Committee’s proposed amendments.<sup>5</sup> One of the HRC’s key recommendations, based on the Change or Suppression Act, was to include a five-year review mechanism like the present Victorian review. The New Zealand Ministry of Justice’s Regulatory Impact Assessment stated that the legislation would be reviewed as part of standard regulatory stewardship processes and timeframes, with the possibility of an earlier review if issues emerged through

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<sup>1</sup> Conversion Practices Prohibition Legislation Act 2022.

<sup>2</sup> Human Rights Commission. (2024). [Conversion Practices in Aotearoa New Zealand: Insights and Recommendations from a Human Rights Perspective](#) at 17.

<sup>3</sup> Phil Smith. (17 October 2021). [Submission rising: Parliament’s feedback flood](#). This figure has since been exceeded in relation to a small number of other Bills.

<sup>4</sup> Human Rights Commission. (2021). [Submission on the Conversion Practices Prohibition Legislation Bill](#).

<sup>5</sup> Justice Select Committee. (2022). [Final Report Conversion Practices Prohibition Legislation Bill](#).

monitoring.<sup>6</sup> To the HRC's knowledge, no such review has occurred since the CPPLA came into force.

7. The CPPLA passed into law on 18 February 2022. Its civil liability provisions, along with the HRC's associated functions, came into force six months later.<sup>7</sup>
8. Under the CPPLA, a person may make a complaint to the HRC under the Human Rights Act 1993 of an unlawful conversion practice being performed or arranged.<sup>8</sup> Section 5 defines conversion practices as any practice, sustained effort, or treatment directed at an individual because of their sexual orientation, gender identity, or gender expression, and carried out with the intention of changing or suppressing those characteristics. Examples and exclusions are included. The exclusions were contentious, with some LGBTQI+ submitters expressing concern that they potentially rendered the definition ineffective in medical settings.<sup>9</sup>
9. The CPPLA also expanded the HRC's functions to include receiving conversion practice complaints and providing information or dispute resolution in an efficient, informal, and cost-effective manner.<sup>10</sup> The HRC had six months to establish this civil response service. Unlike the Victorian Equal Opportunity & Human Rights Commission, the HRC has no investigative powers under the Human Rights Act 1993.
10. As the agency designated to receive civil complaints about conversion practices, the HRC received \$2.25 million in time-limited funding for two years (2021–2023), approved by the Cabinet Social Wellbeing Committee, to contribute to development and implementation of the civil redress service. In addition to the Commission expanding its existing complaints function, a small implementation team - including people with lived experience of conversion practices - led the development of educational resources, delivered awareness-raising activities, and survivor engagement. The team also met with other public sector agencies that may receive complaints, such as Police and the Health and Disability Commissioner, as well as organisations interested in strengthening harm-prevention and awareness initiatives within their own settings.<sup>11</sup>
11. The HRC team met with survivors throughout to ensure that this work was informed by their diverse and complex needs and advice. An equity-based approach to service design and delivery grounded in Te Tiriti o Waitangi was taken, in recognition that Māori, Pacific and ethnic communities experience disproportionate and compounded harm from conversion practices due to the intersecting impacts of colonisation, racism, faith-based stigma, and systemic exclusion. Evidence from survivor engagement and research showed that these communities face higher barriers to accessing safe and effective redress, experience greater risks of family and community rejection, and are more likely to encounter conversion practices within trusted cultural, religious, and familial settings. A one-size-fits-all model would have

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<sup>6</sup> Ministry of Justice. (2021). [Prohibiting Conversion Practices Regulatory Impact Assessment](#) at p 24.

<sup>7</sup> CPPLA, s 2.

<sup>8</sup> CPPLA, s 13; [Human Rights Act](#), s 63A.

<sup>9</sup> See for example: Te Ngākau Kahukura. (2021). [Submission to the Justice Committee on the Conversion Practices Prohibition Legislation Bill](#) at p 2-3.

<sup>10</sup> Human Rights Act 1993, s 76.

<sup>11</sup> See Human Rights Commission (18 August 2022) [New service to hear complaints about conversion practices; four sets of guidelines](#) developed for different settings, plus a booklet on [help for conversion practices complainants](#); Human Rights Commission (17 October 2022) [Matt Langworthy: Beyond Conversion Practices](#).

failed to account for these realities. Accordingly, the service was intentionally designed to be survivor-led, culturally safe, trauma-informed, and responsive to Indigenous and community-specific worldviews, including kaupapa Māori and Pacific frameworks that prioritise whānau, relationality, and collective wellbeing. Taking an equity approach enabled the service to uphold human rights obligations, seeking to address the ongoing impacts of historical and systemic barriers.

12. To inform an evidence-based, survivor centred, and equitable approach, the HRC also undertook primary research<sup>12</sup> and filmed and shared video resources featuring survivors<sup>13</sup> expending the time-limited funding provided by Government.
13. Following the expiry of this funding, the HRC has continued to contribute to conversion practices-related work as part of our business-as-usual activities, including hosting a webinar,<sup>14</sup> speaking at conferences,<sup>15</sup> sharing survivor-led initiatives,<sup>16</sup> and engaging with community leaders, faith leaders, and professional bodies to promote our service and resources.
14. The HRC's 2024 *Insights Report* was a research report on the insights gained since the CPPLA passed.<sup>17</sup> This 100-page report was based on primary research with conversion practices survivors over 18 months. A primary aim of this report was to highlight survivor experiences along with their needs and their advice for others. It also documented the functioning of the CPPLA itself.
15. Please note the following extracts (footnotes omitted):

Page 21: "Survivors have been clear that conversion practices must stop and those who enact them must be held to account. They have also called for complaints and prosecutions to be progressed respectfully with a focus on education and building understanding and empathy for survivors. Despite experiencing rejection and harm, survivors continue to demonstrate understanding and compassion for those who enact conversion practices, whether consciously or unconsciously."

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<sup>12</sup> While not technically 'produced' by the HRC (we had no role in study design, data collection and analysis, decision to publish, or preparation of the manuscript), we commissioned a piece of qualitative research from Dr Michael Roguski at Kaitiaki Research and Evaluation, published in May 2024: [Conversion practices in Aotearoa New Zealand: Developing a holistic response to spiritual abuse](#). Dr Roguski spoke in-depth with 23 survivors of religious conversion practices. Participants were asked about their conversion practice experiences, impacts, what has helped, obstacles to their recovery, the kind of support that would have been useful when first deciding to reject conversion practices, the type of support currently needed, and what needs to be done in terms of policy, legislation, and societal attitudes.

<sup>13</sup> Four short videos featuring diverse survivors of conversion practices representing a broad range of experiences and different communities can be found on [this YouTube playlist](#).

<sup>14</sup> Human Rights Commission. (11 April 2025). [Conversion practices in Aotearoa: Supporting survivors in a range of settings](#).

<sup>15</sup> Including Awaken! Maranga Mai in 2025 and 2023, and the Cross-Agency Rainbow Network national conference in 2023.

<sup>16</sup> OutLine. [Conversion practices survivor network](#).

<sup>17</sup> Human Rights Commission. (2024). [Conversion Practices in Aotearoa New Zealand: Insights and Recommendations from a Human Rights Perspective](#). This was a report the HRC published in 2024 based on primary research over 18 months with survivors of conversion practices. A primary aim of this report is to highlight survivor experiences along with their needs and their advice for others.

Page 42: “The definition of conversion practices in the CPPLA does not extend to ira tangata [intersex people] or interventions directed at them based on their variations of sex characteristics. Amending the CPPLA to include ‘sex characteristics’ could be a useful addition to the health sector response. It would not, however, be sufficient on its own to uphold the rights of ira tangata to bodily autonomy and integrity. Further work is required to respond to the needs of ira tangata as determined by them, including access to psychosocial support, quality information, and healthcare providers who have received education and training about intersex variations. These things can commence irrespective of an amendment to the CPPLA.”

Page 72: See the barriers to accessing the Commission’s services to facilitate reporting conversion practices for ethnic Rainbow people.

Page 83: See the advice regarding disseminating educational content about takatāpui and MVPFAFF+ Pacific peoples.

Page 91: See recommendations 1-8 which are directed towards Government.

Page 95: “The passing of the CPPLA, however, is not a cause for complacency. Survivors have pointed out various areas where the CPPLA could offer better protection. There are no references to medical practices that could be deferred but are performed on intersex people before they can legally consent, its protections are limited by age and do not apply universally, and Attorney-General consent is required for prosecutions. A ban on removing a person from Aotearoa for conversion practices could also be explored. Such a ban would clarify that it would be illegal to travel to another country to procure practices that would be illegal to procure in New Zealand.”

## Limitations of the CPPLA

16. The CPPLA has been described as ‘symbolic,’ with its purpose only partially realised and its practical impact likely limited.<sup>18</sup> These limitations are posited to relate to the legislation’s non-retrospectivity, the high evidentiary threshold of “serious harm” in section 9, that the Attorney-General could deny consent to prosecute, extensive delays in the civil jurisdiction, and the adversarial nature of criminal proceedings.<sup>19</sup> However the ‘symbolism’ of the legislation is likely to still be having a positive effect – by representing societal values and providing an opportunity to address the beliefs that lead to conversion practices occurring in the first place.<sup>20</sup> Research to further explore this would be beneficial.
17. As noted in the HRC’s *Insights Report*, many survivors—especially those subjected to religious or spiritual conversion practices—do not recognise their experiences as conversion practices

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<sup>18</sup> Lara Cable. (2024). [Conversion practices prohibition: Why the Act’s symbolic purpose was only partially realised](#). New Zealand Women’s Law Journal.

<sup>19</sup> Ibid.

<sup>20</sup> Ibid at p 75 – 79, citing New Zealand Human Rights Commission Conversion Practices: Guidance for People Working in Religious Communities (June 2023).

until much later. This is less common for conversion practices encountered in the context of seeking gender-affirming healthcare.

18. Survivor experiences further highlight the limitations of the CPPLA, including reasons survivors may choose not to lodge or progress complaints. For example, a person may still have close relationships with individuals involved in conversion practice environments and fear creating risk for them by submitting a complaint.
19. The HRC also commissioned qualitative, peer-reviewed research from Dr Michael Roguski at Kaitiaki Research and Evaluation, published in May 2024: “Conversion practices in Aotearoa New Zealand: Developing a holistic response to spiritual abuse”. Dr Roguski spoke in-depth with 23 survivors of religious conversion practices. We had no role in study design, data collection and analysis, decision to publish, or preparation of the manuscript.
20. Participants were asked about their conversion practice experiences, impacts, what has helped, obstacles to the individual’s recovery, the kind of support that would have been useful when the individual first decided to reject conversion practices, the type of support the individual currently needs, and what needs to be done in terms of policy, legislation, and societal attitudes.
21. See extract below from the Findings section of the article relevant to this submission:

#### 3.4.1. Inadequacy of legislation.

Recently enacted anti-conversion practice legislation was unanimously viewed as inadequate. While participants acknowledged the symbolic importance of the legislation, in that it clearly demarcates the unacceptability of formal conversion practices, they were sceptical that the law, as a singular intervention, is sufficient to end conversion practices.

On one level participants were sceptical because some fundamentalist faith settings were reported to have developed covert ‘therapeutic’ strategies to circumnavigate legal categorisations or operating such practices “underground”.

*I’ve got no doubt in my mind that it still goes on. The law changing the rules on conversion therapy is not going to stop it because it’s going to be pushed underground which is going to get more dangerous because it’s not going to be talked about.*  
(Participant #11)

The legislation was also critiqued for placing the onus on the victim to report breaches of the law, a requirement that was regarded as problematic on two levels. First, reporting requirements were regarded as unrealistic as the majority of formal conversion practice survivors had “willingly” participated in the various “therapeutic” interventions, and survivors only recognised their abuse as conversion practices after they had left the abusive environments, often after a number of years. Next, reporting spiritual abuse is problematic as it commonly occurs in settings where friends and family, who are members of a community of faith, have colluded with the various mechanics of abuse. Within this context a desire to avoid the possible criminalisation of the survivor’s loved ones was regarded as a significant barrier to reporting, a dilemma that has been identified in other abuse settings [36, 40–43].

Finally, the legislation was viewed as inadequate because it does not address informal and conversion practice ideology. As a consequence, outside of formal therapeutic environments, those who fall outside of heteronormative definitions of “appropriate” continue to experience harm, inclusive of gender identity, gender expression, and sexual identities. Especially noted mechanisms of conversion ideology included continued othering through theological and spiritualised dictates, deliverance, calls for members of the faith to seek prayer for breaches of heteronormative norms, and excommunication.

*The law is a pretty weak kind of instrument. When you are up against a cult with that level of fundamental belief in the rightness of what they're doing, there is a need for laws that protect people beyond just conversion therapy. I mean it's nice that they've changed the law, but it does nothing.* (Participant #7)

22. And the following from the Discussion section:

“the study’s findings issue a challenge to critically engage with the existence of conversion practices at an informal and ideological level while ensuring that legislation addresses survivor needs through the creation of interventions and the provision of ongoing support. Failure to do so risks continued harm.”

“that legislation that places the onus on survivors to make complaints is problematic, as spiritual abuse occurs in settings that often include friends and family who collude with the various mechanics of abuse. In this context, requirements to report spiritual abuse can act as a significant barrier as reporting risks the potential criminalisation of loved ones.”

## Enquiries and complaints received by the HRC

23. As at 13 March 2026, the HRC’s Information and Dispute Resolution database had recorded **44 enquiries and complaints relating to conversion practices**. This total includes communications from individuals who opposed the CPPLA received by the HRC’s in-take service. Approaches made directly to the dedicated conversion practices response team established to support the commencement of the legislation were not recorded in this database.

24. **Nine matters were received before section 63A came into force**. Of these, three expressed concerns about the legislation, two sought information, two involved conduct assessed as falling outside the scope of section 63A, and two mentioned conversion practices but were complaints on another basis and not about the conversion practices mentioned.

25. Of the **34 matters received after section 63A came into force**:

- **Twenty** were requests for information. These included Official Information Act requests, queries about the legislation, requests for HRC publications, and enquiries seeking contact details for support organisations.
- **Two** were complaints about the legislation.
- **Eleven** were complaints about conversion practices that fell outside the scope of section 63A. Reasons included the nature of the conduct complained about, the complainant not

being directly involved, or the events falling outside the relevant timeframe. All eleven matters are now closed. In most cases, the HRC provided information in response. **In one case, dispute resolution services were offered but not taken up; in another, the complaint proceeded to mediation and was resolved.**

- **One** conversion practices complaint assessed as falling inside section 63A has been closed as the complainant has not taken up dispute resolution.
- **One** conversion practices complaint remains open.

26. The overall volume of enquiries and complaints has not been high, but this was expected.<sup>21</sup> The CPPLA is not retrospective, meaning many survivors are ineligible to bring complaints because their experiences fall outside the required timeframe. Additionally, survivors face significant barriers to engaging with the complaints process. These barriers include controlling or isolating environments that limit access to information or support, and high levels of shame or stigma, particularly for individuals who once pursued conversion practices themselves.
27. Given these factors, the HRC anticipated that enquiry numbers would remain lower than in other areas of its mandate. While the CPPLA provides a civil redress pathway, an essential part of the HRC's role is also to provide information and education about the harm caused by conversion practices and about the legislation itself.<sup>22</sup>
28. The CPPLA was not enacted with the intention of generating prosecutions, nor because conversion practices are highly prevalent. Rather, its core purpose is to protect a vulnerable population from specific forms of harm.
29. Criminal enforcement sits with New Zealand Police. As of 19 March 2026, Police had recorded one occurrence for each of the two conversion-practice-related offences<sup>23</sup> between 1 January 2022 and 31 December 2025.<sup>24</sup>
30. To date there have been no legal proceedings (civil or criminal) under the legislation, leaving questions about interpretation and application of the law unresolved.

## Other Aotearoa data

31. A growing body of Aotearoa New Zealand research demonstrates that conversion practices continue to be experienced by LGBTIQ+, takatāpui, MVPFAFF+<sup>25</sup> and trans communities, notwithstanding prohibition of the practices and the relatively low number of formal complaints made to the HRC or Police. Community-led surveys show that conversion practices are occurring across different age groups, cultural communities, and gender identities. These findings indicate that complaint data alone significantly underrepresents the prevalence of conversion practices. They also underscore the importance of research evidence in

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<sup>21</sup> See Toby Manhire. (24 May 2023). [Revealed: the conversion therapy prosecutions since legal ban kicked in.](#)

<sup>22</sup> See for example the HRC website pages on conversion practices: <https://tikatangata.org.nz/resources-and-support/conversion-practices>.

<sup>23</sup> CPPLA ss 8 & 9.

<sup>24</sup> Email from NZ Police to HRC dated 19 March 2026.

<sup>25</sup> An acronym coined by Phylesha Brown-Acton centering Pacific-specific terms: Māhū, Vakasalewalewa, Palopa, Fa'afafine, Akava'ine, Fakaleiti, and Fakafifine

understanding both the scale and nature of harm, as well as barriers to disclosure and reporting.

32. Sources of information on conversion practices in Aotearoa include:

- [Manalagi survey](#) (2021)
  - The Manalagi survey, a nationwide study of 482 Pacific LGBTQIA+ MVPFAFF+ people aged 15 and over, found that 14% of participants reported being subjected to conversion therapy, with a further 4% preferring not to answer, indicating both the prevalence of conversion practices and the sensitivity and stigma surrounding disclosure within Pacific communities.
- [Identify survey](#) (2021)
  - The Identify nationwide survey of over 4000 takatāpui and rainbow (LGBTQI+) young people aged 14-26
  - 3% (124 people) reported experiencing conversion 'therapy'
  - 3% (129 people) chose to skip this section, and 1% (n=41) preferred not to respond
  - Combined, this represents a prevalence of 7% - likely a more accurate estimate for a non-probability youth sample
- [Counting Ourselves survey](#) (2022)
  - Counting Ourselves, a nationwide survey of 2631 trans and non-binary people aged 14+
  - Chapter 15 examines conversion practices, including attempts to stop participants from being trans or non-binary
  - One in seven (14%) reported experiencing a conversion practice aimed at changing or suppressing their gender identity, gender expression, or sexual orientation; and another 17% thought it might have happened to them but weren't sure
  - These results may shed crucial light on gaps and exclusions in s 5(2) of the CPPLA
  - The survey also gathered data on support needed after experiencing conversion practices<sup>26</sup>

## Conclusion

33. The HRC appreciates the opportunity to contribute to the review of the Victorian Change or Suppression (Conversion) Practices Prohibition Act. Our experience administering the civil response pathway under New Zealand's Conversion Practices Prohibition Legislation Act 2022 demonstrates both the opportunities and limitations of legislative approaches to addressing conversion practices.

34. Although the volume of complaints and enquiries received has been relatively low, this aligns with the known dynamics of conversion practice harm, including the influence of controlling

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<sup>26</sup> Ashe Yee and others. (2025). [Counting Ourselves: Findings from the 2022 Aotearoa New Zealand Trans and Non-binary Health Survey](#) at 139-141.

or isolating environments, and the ongoing stigma experienced by many survivors – many of whom fall outside of the scope of the recent legislation. These factors underscore the importance of complementing legislative mechanisms with proactive education, survivor-centred engagement, and cross-sector collaboration.

35. The HRC's work - supported by community advocacy, survivor expertise, and research - demonstrates that addressing conversion practices requires a holistic, trauma-informed approach that recognises the complexity of survivors' experiences and the environments in which these practices occur. Ensuring accountability, preventing harm, and promoting healing depends not just on the availability of robust legal frameworks but on long-term investment in education, awareness-raising, and community partnerships.
36. As Victoria undertakes this review, we offer our experience in Aotearoa New Zealand as evidence of both the promise and the challenges of legislative reform in this area. We refer you in particular to our *Insights Report*, and hope that our report and this submission together support the development of a strengthened, survivor-centred framework that upholds human rights and prevents ongoing harm caused by conversion practices.
37. We acknowledge the contributions of survivors in Aotearoa New Zealand, as outlined in our *Insights Report*. We also recognise the leadership of survivor advocates in Australia. Organisations including the BRAVE Network, Ambassadors for Bridge Building International (ABBI), and individual survivor leaders developed survivor-centred, trauma-informed resources and practice guidance. Their contributions not only helped shape Victoria's legislative response, they also strengthened the development of survivor voice and agency in Aotearoa New Zealand through shared advocacy, learning, and peer support.