

Submission to the Victorian Law Reform Commission
Focused Review of How the Change or Suppression Practices Ban Is
Working

Please note that submissions must be relevant. We only review the matters detailed in the terms of reference. We recommend using the consultation paper and these questions to help guide your submission.

We will publish public submissions on our website, unless they are offensive, defamatory, or outside the scope of the review.

We will not publish the names of individuals who make a submission. We will also redact any information which may indirectly identify individuals.

The consultation paper relates to change or suppression practices, which can cause ongoing trauma and long-term health issues. If you need counselling or help you can get support by contacting the organisations on our [support page](#) or page 3 of the consultation paper.

[REDACTED]

Please provide your comments on the questions below. You may answer all or only some of the questions as relevant to you.

1. Has the Act reduced or stopped change or suppression practices? Describe any impact you think the Act has had on the occurrence or the nature of change or suppression practices.

Wanting to change (for instance) one's sexual orientation is not something that we would want the government to dictate or even be involved in. Better that people work out for themselves where best to get support, without a fear of prosecution for the therapist or similar support service.

The fear of prosecution for counsellors etc. is in fact preventing help making its way to the most needy. If we were counsellors, we would not take on LGBTIQ+ clients because we might go to jail if we say the wrong thing! The legislation means that there are fewer and fewer places for help, as therapists are running scared.

Because the term 'change or suppression practices' is so broad, anything that could remotely be considered likely to fall under that heading is no longer taking place.

The term 'conversion practices' has instant negative connotations and would appear to be designed to malign ordinary counselling, as well as religious counselling or prayer.

2. To what extent do you think the community is aware of and understands:

a. the Act and how it works

b. what change or suppression practices are

c. the harm caused by change or suppression practices.

a) The community completely understands the Act. Parents are petrified that they can no longer teach their own children principles that have held them in good stead.

b) The term 'change or suppression practices' is far too broad. Unfairly, the only thing excluded is the so-called 'affirmative' model.

In the UK the recent Cass Review has recommended that there be no more drugs nor surgery for gender dysphoric people and the main dispenser of drugs, the Tavistock program, has been discontinued as a result. A recent law case in the US found that a minor was too young to consent to having her breasts removed. She was awarded \$US200,000. Qld. and N.T. have already stopped puberty blockers from being dispensed. The tide is turning and the Victorian Government is opening itself up to litigation if it continues with the drugs and surgery model.

c) It should not be only legal for a child to be sent down the path of pills and surgery. Stopping gender-dysphoric children from accessing counselling (which is what has happened as a result of this legislation, because counsellors are too afraid to counsel) has been devastating — removing access to services desperately needed.

3. Could the Act's operation and effectiveness be improved? If so, how?

Yes, by:

1. Give parents back their rights!

2. Making 'conversion practices' only mean coercive actions.

3. Allowing gender-dysphoric people to access alternative care, not just practitioners (if you can call them that) that would send them in the direction of pills and surgery.

4. Get rid of fines, so an actual court can determine what's OK.

5. In the definition of 'conversion practices', create an exemption for religious practices (e.g. prayer / counselling) and clinical counselling, not mention parental guidance.

4. 5. How clear is the Act's definition of what is and what is not a change or suppression practice? If further clarity is needed, what forms of clarification would be most helpful?

The definition of 'conversion practices' should be changed to take account of recent bans on puberty blockers in Australia and overseas. It should also take into account Family Court Judge [REDACTED] recent criticism of the Royal Children's Hospital's Australian Standards of Care (ASOCTG).

5. How clear is the Act's definition of what is and what is not a change or suppression practice? If further clarity is needed, what forms of clarification would be most helpful?

How clear is the exclusion for health service providers? If further clarity is needed, how could this best be achieved?

Section S3 the N.S.W. Conversion Act (as mentioned in Consultation Paper 2.17) contains explicit mention of banned practices, rather than the vague ones in Section 5(2)(b) of our Act.

The now outdated Victorian Act makes pills and surgery the only lawful pathway. The Act needs to be reviewed, in part because it relies heavily on the far-from-perfect AusPATH and WPATH guidelines.

6. Is greater clarity needed about how people of faith can hold and express their beliefs to support clear understanding and compliance with the Act? What forms of clarification would be most helpful?

People of faith who aren't sure of their gender or sexual orientation are treated terribly by this legislation. They are only given one legal option, in a direction that is increasingly (worldwide) being seen to be damaging. There is currently no freedom of choice.

You put it in 2.22. Explicit examples are what is needed.

The government should not be able to determine how people of faith can hold and express their beliefs. Freedom of religion is explicitly protected in Article 18 of the ICCPR, something the act ignores.

Parents are even afraid of sharing their values with children. This should not be the case.

7. How effective are VEOHRC's awareness and education materials on change or suppression practices? What improvements, if any, could help strengthen community understanding and compliance?

The materials seem to be explicitly written to demonise (every pun intended) people of faith and traditional sexual mores.

Freedom of choice is what should be being promoted.

Circumstances where the law holds a parent criminally liable for something they teach their child should be made crystal clear.

At one point, VEOHRC's website told Victorians that parents denying drugs to their gender dysphoric child would be held guilty of a 'conversion practice.' The law does not say this and they had to later admit that they had it wrong.

There has been no accountability from the VEOHRC regarding who made this mistake.

8. Are there any barriers to:

- a. reporting change or suppression practices to VEOHRC
- b. VEOHRC facilitating outcomes of reports
- c. VEOHRC conducting investigations.

If so, please describe what those barriers are.

No. An anonymous complaint is even possible. It's actually far too easy to complain and means vexatious complaints are made easier.

VEOHRC pretty much does what it wants and wields enormous power.

9. Are there changes that could help support VEOHRC to carry out its functions or improve the effectiveness of the civil response scheme? If so, please describe any changes.

Yes. We would like to see:

- A. Complainants be identified and properly documented.
- B. All cases taken on by the VEOHRC to be transparently reported
- C. The removal from the Act of the 'secrecy provision' It's in Section 51, referenced in 3:13
- D. An annual report be issued that clearly details what's going on at the VEOHRC regarding this issue.

10. Are there barriers to reporting, investigating and prosecuting criminal change or suppression offences? If so, what are they?

No.

The law has, however, restricted ordinary religious practice. It has led adherents to keep quiet out of fear.

Any expansion of the Act, e.g. introducing of an offence that does not require proof of injury (4.5), should be opposed. It would open up a pandora's box of possible vexatious outcomes.

11. Are there other aspects of the criminal offences in the Act that limit their effective operation? If so, what changes or supports could improve their operation?

No. Not applicable.

12. Do existing avenues for redress adequately meet the needs of victim-survivors of change or suppression practices? Are there gaps, harms or barriers that require an additional or separate redress mechanism?

a) Yes

b) No

It should not be possible to prosecute for actions that took place before the Act was put in place.

13. Should a civil cause of action be introduced under the Act? What distinct purpose would it serve compared to existing pathways?

No. None.



[REDACTED]

Email your submission to csp@lawreform.vic.gov.au or send it by post to:

Victorian Law Reform Commission

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Submissions close on 24 March 2026

For more information on how we treat submissions see our [Submissions Policy](#).

Find further information on this review and the consultation paper on the [project page](#).