

[REDACTED]

[REDACTED]

[REDACTED]

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.

No data available to comment.

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 and c. the harm caused by change or suppression practices

Community is well aware,

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

The definition is the act is too broad E.g Prayer - This is private and public. I can pray to God in my house -in my mind with out any human person hearing it. If I later publish on the internet that I prayed or (pray) all people wanting gender transition may discern and God open their mind that this is against God's law - am I open to submission. (I am even fearful of responding to this question as it is not clear that the response to this question can be used against me for having prayed for those who are transitioning)

4. 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 definitions are too broad and is open for interpretation and needs to be tightened. The unprecedented intrusion of the state into the content of religious doctrine, as effected by the Change or Suppression (Conversion) Practices Prohibition Act 2021, raises profound concerns about the erosion of religious freedom in Victoria, and the Act's ambiguity is such that a pastor or faith leader cannot know with certainty whether their teaching constitutes a prohibited practice, thereby imperiling their ability to freely exercise their religious duties.

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

The act in its definitions are too broad and places fear and uncertainty for health professionals especially if they are advising those under 18 years (too young even to vote) and potential prosecutions and de-registration.
Health Practitioners acting in their professional capacity such as GPs should be excluded from prosecution. The express example in the Act that psychotherapy is a prohibited suppression activity unless it falls within the exemption creates a chilling effect on clinical practice, as it may deter practitioners from using their professional judgment to provide individualized care to clients. This provision, combined with the Act's failure to provide clear protection for practitioners with non-affirming clinical views, treats a clinician's faith perspective as presumptively incompatible with or

compromising professional judgment, undermining the principles of evidence-based practice and informed consent

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?

The broad definitions in the act created fear of prosecution for religious ministers. E.g Catholic Church in its masses has prayers for the faithful where a prayer can be " Pray all people wanting gender transition may discern and God open their mind that this is against God's law " -Under the current Act and definition the particular minister and church can be prosecuted and it is not clear that if a judge would uphold the charge .

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 material produced by VEOHRC has a biased view. It is not clear on exemptions especially to faith and religious ministers and leaders. The consultation materials provided by the Victorian Law Reform Commission have a profound impact on the public's understanding of the Change or Suppression (Conversion) Practices Prohibition Act 2021, and unfortunately, they produce a chilling effect by characterising the broadest possible range of conduct as potentially prohibited. The characterisation of certain practices as "conversion practices" is a contested clinical position that is not supported by the best available evidence, including the Cass Review. The consultation document's approach is not a neutral description of the law, but rather an advocacy document that seeks to maximise the reach of the Act beyond what the legislation requires, which undermines the integrity of the consultation process and its ability to produce balanced or evidence-based recommendations.

If so, please describe what those barriers are.

N/A

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.

The Victorian Equal Opportunity and Human Rights Commission (VEOHRC) has a critical role in developing materials under the Change or Suppression (Conversion) Practices Prohibition Act 2021. In performing this function, VEOHRC should be required to consider current best-evidence guidance, ensuring that its materials are informed by the most reliable and up-to-date research. This should include engagement with other systematic reviews of the evidence on gender-affirming care, which provide a comprehensive understanding of the complex issues at play. Failure to do so risks VEOHRC materials being based on incomplete or inaccurate information. Uncritical adoption of affirmation of gender identity as the only medically appropriate option can also cause serious harm to vulnerable young people, and VEOHRC must avoid this approach in its materials.

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

No.

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?

Remove the word "prayer" which is too broad. If I pray privately for discernment for those considering gender change. I know no such person personally. If mention publicly that I did so. If someone took it to VEOHRC or Vic Police - I can be prosecuted under the current law- for do some thing which did not interfere with the decision of an individual

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?

Existing avenues for redress is fully adequate.

13. Should a civil cause of action be introduced under the Act? What distinct purpose would it

serve compared to existing pathways?

No. The introduction of a civil cause of action against faith leaders and pastoral care activities under the Change or Suppression (Conversion) Practices Prohibition Act 2021 would have devastating consequences for religious communities. Pastors, priests, imams, and rabbis who offer prayer, counsel, or scripture-based guidance could face civil liability simply for expressing their faith tradition's teaching, effectively silencing them on matters of deep importance to their congregations. The Act's broad definition of prohibited practices creates a pervasive chilling effect on speech, deterring faith leaders from engaging in any pastoral activities that may be misconstrued, even if they are ultimately vindicated, due to the crippling costs of defending themselves.

