

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.



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.**

People most impacted by these restrictions are the very ones who need alternative help.

Anyone working in the mental health industry, religious counselling or prayer become hesitant to work with LGBTIQ+ clients because they risk fines or are unfairly incarcerated for allegedly saying/doing what these suppressive practices guidelines promote.

What we have then is further exacerbation of psychological distress, physical harm and most concerning of all suicide in the case of would-be clients..

Suppression is damaging to all involved in these practices.

- 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 understands the Act and its limitations. Mums & Dads become hesitant in voicing within their own families - sexual ethics aligning with their faith. Such an oppressive control over parental rights to seek alternative help should not be denied. And, a child's distress of experiencing gender confusion is a family issue first and foremost NOT something the state should have primary access to. Serious criminal penalties, which may include taking a child away from their family - unnecessary and dangerous practice for all involved.

b) Albeit, excessively broad and misleading, "conversion practices" are clearly defined in the Act. Unfortunately, the only exclusion is the so-called "affirmative" model. The Cass Review bans on puberty blockers in the NT, Queensland, and other countries have seen great results for those involved - why are we not implementing these necessary up-to-date clinical changes? Further, successful challenges against sex-reassignment surgery in Britain and America are evident. We need to review and update what is happening regarding the harm children are experiencing via these practices and the damage it is causing within families.

c) The prohibition of ordinary or religious counselling has caused real harm — not the exaggerated harm of these said practices. Denying others from second opinions, holistic healthcare and counselling causes greater distress, confusion and conflict within and around all communities. An exclusively affirmative model must not be the only legal pathway of care for those experiencing gender distress.

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

Yes,

- 1) The definition of 'conversion practices' to coercive, torturous or unethical practices should be implemented.
- 2) Parental rights, first and foremost within the Act need to be restored.
- 3) Freedom of choice for those seeking holistic or alternative care is a necessary addition - not just an 'exclusive' affirmative model.
- 4) Removing religious practices (including prayer/pastoral counselling/community support) and legitimate clinical counselling from the definition of 'conversion practices'.
- 5) The civil penalty scheme so that punishable practices meet thresholds determined by a Court needs to be abolished.

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 definition of 'conversion practices' should be amended so that it reflects current medical evidence and legal developments.

We need to be current with recent clinical changes.
Bans on puberty blockers in Australia and overseas should be adhered to.

Further, the criticism of Family Court Judge [REDACTED] toward the Royal Children's Hospital's Australian Standards of Care (ASOCTG) should be acted upon.

Religious practices, clinical counselling and parental guidance on sexual ethics should be removed from the definition of 'conversion practices'.

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

The government needs to reconsider its approach to these medical practices.

Worldwide, medical evidence now disagrees with the benefit of gender transition practices.

Why are we still adhering to such dangerous practices?

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?

Government in a western, pluralist democracy has no legitimacy to determine 'how people of faith can hold and express their beliefs'.

Australia has signed up to the ICCPR.

Article 18 of the convention requires that the country protect freedom of religion.

Why are these constraints are not recognised in this Act?

This Act has deeply restricted religious freedom and parental rights. It has placed people of faith in tension with their heartfelt principles and moral standards.

Sexual orientation or gender distress especially impacts those of faith.

Isolation due to the limitation of a single, legally approved, pathway is not beneficial to these individuals.

Those who freely consent to holistic or alternative support should have the right to pursue it.

Freedom of religion and freedom of choice must be our God-given right.

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?

VEOHRC awareness and education materials give only one way of dealing with a person's gender identity/sexual orientation.

This approach ignores medical developments that support more holistic and alternative responses to gender dysphoria.

Religious freedom and other cultural views are not taken into account.

As with the definition of 'conversion practices,' the educational material that Vic government and contractors provide, must be updated to reflect current medical evidence and legal developments.

There is a lack of transparency and accuracy in what the VEOHRC is saying about of the Act.

Initially, VEOHRC's website told Victorians that parents resisting the medication of their gender dysphoric child would be held guilty of a 'conversion practice.'

Concerningly, this dangerously misrepresented the law.

VEOHRC later admitted that 'it is not clear how the law will apply to an offense by a parent' and removed that particular illustration.

The law needs to be absolutely clear in how it states a parent is criminally liable for something they teach their child.

A parent must NOT be held liable on such an occasion. Please leave these to more serious and concerning occasions.

Needless to say, but it will be said - This is not one of those.

VEOHRC has not answered how the misleading statement came to be posted on its website. Nor has it revealed who, within VEOHRC, is accountable for spreading the false and alarming statement.

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.

Complaints are made easily so the process is accessible to those who want to maliciously cause harm.

Further, anonymous complaints are allowed - so there are not repercussions for those who want to misuse or weaponise their voice to cause further harm to all those involved.

VEOHRC holds broad powers to facilitate outcomes and conduct investigations; There needs to be a legal, dissenting voice to provide an even balance against such expansive and largely unsupervised authority.

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.

1) The “ secrecy provision ” (Section 51, as referenced in 3:13) needs to be removed from the Act.

2) All investigations and cases reported to VEOHRC must be conducted with transparency and available to all to peruse and comment on.

3) Complainants must be identified and properly documented.

4) An annual public report outlining investigations, cases and outcomes be released.

5) Any proposed “ positive duty ” to prevent harm (3:20 – 22) not be introduced, as it would further impact religious freedom.

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

There are no barriers.

There has been an absence of criminal offences.

This suggests there have been no clear instances of conversion practices in Victoria.

The law has greatly impacted religious freedom. It has led to self-censor out of fear. It restricts ordinary religious expression and practice and alternative views - such necessary counter-balances in a supposedly democratic, western nation.

Any expansion of the Act, via broader civil or criminal provisions or the introduction of an offence that does not require proof of injury (4.5), should be removed.

Primarily, because measures would be highly subjective and open to misuse by all those who wish to maliciously harm those who have alternative views.

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?

None.

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?

No More is Necessary.

Victim-survivors already have multiple avenues to pursue financial compensation (5.4).

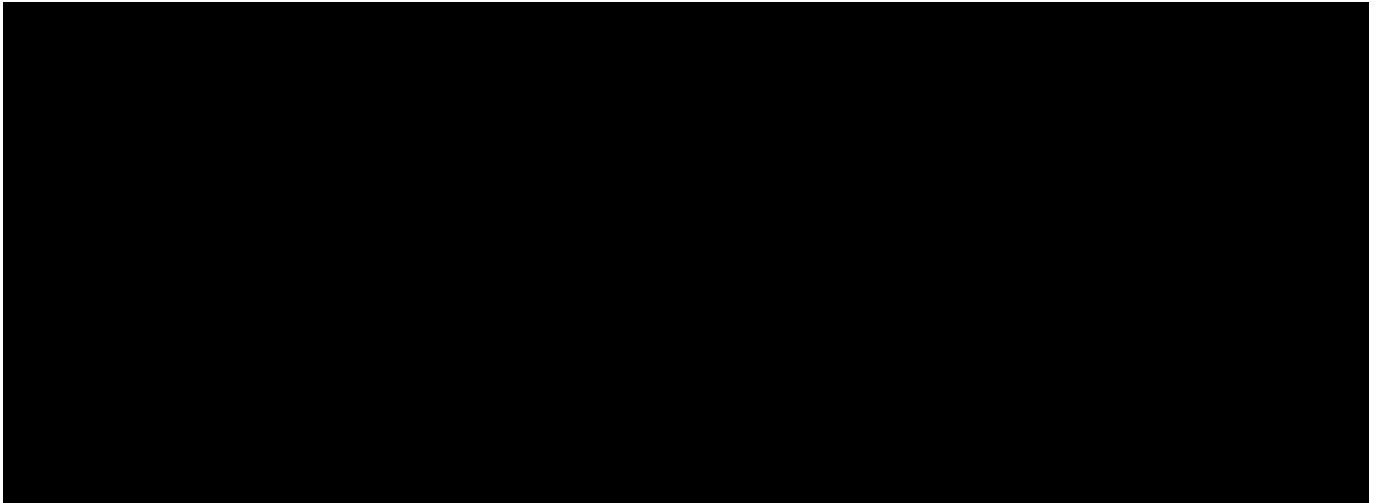
The existing Financial Assistance Scheme (FAS) criteria, including the requirement to demonstrate proof of injury must be retained to ensure fairness and prevent misuse.

No person should be held liable for an action they undertook before this Act was enacted (ie. no retrospective redress).

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

Introducing a civil cause of action is unnecessary, wasting further tax-payer dollars and causing more grievous harm to our fractured state.

There are already multiple ways to deal with these concerns.



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](#).