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**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.**

The Change or Suppression (Conversion) Practices Prohibition Act 2021 appears to prioritize intersectional politics over a nuanced understanding of the complexities of harm in the community. This provision is problematic because it casts an overly broad net, capturing benign conduct while failing to provide clear guidance on the kind of coercive or abusive behavior that genuinely harms individuals, thereby undermining the law's purported aim of protecting victims.

**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?**

Concerns arise regarding the definition of prohibited conduct under the Act, as it fails to explicitly safeguard exploratory or Socratic questioning in therapeutic settings, potentially discouraging clinicians from exploring alternative possibilities, such as same-sex attraction, or considering differential diagnoses, like autism spectrum disorder, thereby undermining a comprehensive and nuanced therapeutic approach.

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

The Act's failure to account for the contested evidence base surrounding conversion practices undermines the provision allowing for reasonable professional judgment, as it does not provide sufficient clarity on what constitutes a legitimate clinical approach. This lack of clarity, combined with the Act's narrow exemption for health services, leaves practitioners with non-affirming clinical views uncertain about whether their ordinary professional practice is protected, even when evidence-based and conducted with 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?**

A person who freely seeks support from a pastor or faith-based counsellor to align their same-sex attraction with their religious beliefs may inadvertently expose that counsellor to liability under the Act. This raises serious concerns about the Act's intrusion into both religious freedom and individual autonomy, as it fails to provide for the consensual and voluntary support sought by LGB individuals of faith.

**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 Act's premise that conversion practices are inherently harmful and that affirmation of gender identity is the only valid approach is a contested clinical position not supported by the best available evidence, including the Cass Review. The consultation materials exacerbate this problem by characterising a broad range of conduct as potentially prohibited, producing a chilling effect that

deters Victorians from engaging in lawful speech and activity, including ordinary conversations, pastoral care, and clinical practice, and ultimately undermining the development of balanced and evidence-based recommendations.

**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) should not rely solely on outdated research when developing materials under the Change or Suppression (Conversion) Practices Prohibition Act 2021, but rather engage with other up-to-date systematic reviews of the evidence on gender-affirming care. In addition, VEOHRC should consider the findings of the Cass Review, current best-evidence guidance, and exercise caution in its materials to avoid uncritically adopting affirmation of gender identity as the only medically appropriate option, which risks causing serious harm to vulnerable young people.

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

The Act's overly broad definition of change or suppression practices creates an unacceptable risk that individuals will be held liable for simply expressing their sincerely held views in everyday conversations, sermons, therapy sessions, or public forums. The provision for a private right of action through civil tribunals is particularly concerning, as it enables any individual who feels aggrieved to bring a claim with a lower standard of proof, potentially imposing significant costs on respondents regardless of the outcome.