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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.

MISGUIDED FOCUS: The Change or Suppression (Conversion) Practices Prohibition Act 2021 appears to prioritize intersectional politics over identifying and addressing genuine instances of serious harm in the community. This misguided focus is reflected in the Act's overly broad definition of "change or suppression practice", which sweeps up innocuous conduct while failing to provide clear guidance on what constitutes the kind of coercive or abusive conduct that has caused real harm to victims of conversion practices. A law genuinely committed to protecting victims should be precisely targeted at preventing serious harm, rather than drafted so broadly that it ensnares ordinary conversations, pastoral care, and clinical practice.

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?

NOT A LEVEL PLAYING FIELD: The Act's carve-out for practices that encourage or promote gender transition creates an uneven playing field, explicitly protecting affirmation while leaving non-affirmation exposed to liability, and this lack of parity undermines the principle of neutrality in clinical approaches to gender dysphoria.

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

MORE CLARITY NEEDED: The Act's provisions undermine the confidence of practitioners with non-affirming clinical views in their ability to engage in ordinary professional practice, even when evidence-based and conducted with informed consent, as the express example of psychotherapy being a prohibited suppression activity unless exempt creates a chilling effect, and the legislation's treatment of a clinician's faith perspective as presumptively incompatible with professional judgment exacerbates this concern.

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?

NEEDS EXAMPLES: The Act's broad definition of change or suppression practices creates uncertainty for pastors and faith leaders, who cannot be sure whether ordinary pastoral care, prayer, or scripture-based counsel will expose them to liability. This lack of clarity is an extraordinary intrusion into both religious freedom and individual autonomy, as it fails to provide clear guidance on what constitutes a permissible faith-based practice. Unlike the NSW Bill, the Act provides no examples of faith-based practices that will not constitute a change or suppression practice, instead offering only a caution that faith practice may contravene the Act, leaving religious communities in a state of uncertainty.

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?

CASS REVIEW: The Victorian Law Reform Commission's consultation materials on the Change or Suppression (Conversion) Practices Prohibition Act 2021 present a concerning narrative that misrepresents the complexity of the issue, as the position taken is not supported by the best available evidence, including the Cass Review, which highlights the need for a more nuanced approach.

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.

UTTERLY INADEQATE: The Victorian Equal Opportunity and Human Rights Commission's guidance materials, to the extent they purport to be authoritative interpretations of the Change or Suppression (Conversion) Practices Prohibition Act 2021, should not be permitted to stand as such under the Act, particularly where they uncritically adopt 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?

CHILLING: The imposition of civil liability under the Change or Suppression (Conversion) Practices Prohibition Act 2021 would have a profoundly chilling effect on religious leaders and pastoral care providers, as the financial burden of defending against even unfounded claims would deter many from engaging in any form of spiritual guidance or counselling with individuals questioning their sexual orientation or gender identity, even if such engagement is entirely voluntary and sought after by the individual.