

**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 identifying and addressing genuine instances of serious harm in the community. This provision is concerning as it fails to provide clear guidance on what constitutes coercive or abusive conduct, instead capturing ordinary conversations, pastoral care, and clinical practice under its overly broad definition of "change or suppression 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?**

The Change or Suppression (Conversion) Practices Prohibition Act 2021 fails to achieve genuine neutrality by implicitly endorsing a particular clinical approach, while leaving religious practices, including prayer-based practices, vulnerable to prosecution without clear guidance on what constitutes a permissible exception, thereby forcing pastors and faith leaders to navigate a legal landscape where they cannot be certain whether their teaching contravenes the law, effectively defaulting to an outright ban on doctrinal preaching on matters of sexuality and gender, and entrenching an affirmation-only approach that undermines the freedom of religious expression.

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

The Act's provisions unfairly target clinicians of faith, subjecting them to adverse treatment not applied to practitioners whose approach is informed by other ideological commitments, thereby raising concerns about discriminatory treatment. This discriminatory approach undermines the confidence of practitioners with non-affirming clinical views, who cannot be assured that 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?**

The Act's failure to provide clear examples of faith-based practices that are explicitly protected, unlike the NSW Bill, creates uncertainty and risk for pastors and faith-based counsellors who respond to requests for support from individuals seeking to live in accordance with their faith, despite the person's same-sex attraction, and constitutes an extraordinary intrusion into both religious freedom and individual autonomy.

**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 framing of ordinary conversations, pastoral care, and clinical practice as potential conversion practices within the consultation materials has a deterring effect on Victorians, discouraging them

from engaging in lawful speech and activity, and this is particularly concerning given that the position underlying this framing is contested and not supported by the best available evidence, including the Cass Review.

**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 be required to consider current best-evidence guidance when developing materials under the Change or Suppression (Conversion) Practices Prohibition Act 2021 to ensure that its resources are informed by the most up-to-date and reliable research. Furthermore, VEOHRC should also engage with the findings of the Cass Review, the most comprehensive independent review of gender medicine for children and young people ever conducted, to ensure that its materials are informed by the latest evidence and best practice in this area.

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

The imposition of potentially substantial costs on respondents, regardless of the outcome, is likely to have a chilling effect on pastoral care and spiritual guidance, deterring religious leaders from engaging with individuals on sensitive matters of faith and identity, for fear of incurring significant financial burdens.