

**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 prioritizes intersectional politics over identifying genuine instances of serious harm in the community, resulting in a definition of "change or suppression practice" that is overly broad and imprecise. This provision fails to provide clear guidance on what constitutes coercive or abusive conduct, instead capturing ordinary conversations, pastoral care, and clinical practice that cause no harm, while neglecting the need for a precisely targeted law that truly protects victims of conversion 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 Act's definition of change or suppression practices defaults to an affirmation-only approach, which is concerning as it may inadvertently stigmatize and restrict non-affirming exploratory discussions, including those that consider alternative possibilities such as same-sex attraction or ruling out other diagnoses like autism spectrum disorder.

**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 provide clear protections for practitioners with non-affirming clinical views, particularly those informed by faith-based perspectives on gender, undermines confidence in the health services exclusion and raises concerns that ordinary professional practice conducted with informed consent may be deemed unlawful, even where evidence-based, if it diverges from prevailing views on gender identity.

**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 broad definition of change or suppression practices creates uncertainty for pastors and faith leaders, who cannot know whether ordinary pastoral care, prayer, or scripture-based counsel will expose them to liability. Unlike the NSW Bill, the Act fails to provide examples of faith-based practices that will not constitute a change or suppression practice, leaving faith leaders to navigate a complex and potentially treacherous landscape. This omission is particularly concerning as it means that an LGB person of faith who consensually seeks support to live and practise their religion consistent with their same-sex attraction is not catered for by the Act.

**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 in the materials accompanying the Change or Suppression (Conversion) Practices Prohibition Act 2021 is overly broad and has a chilling effect, deterring Victorians from engaging in

lawful speech and activity, and is particularly concerning given that it reflects a contested clinical position 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's (VEOHRC) implementation of the Change or Suppression (Conversion) Practices Prohibition Act 2021 should be informed by the most comprehensive and up-to-date research available. The Commission should be required to consider the findings of the Cass Review, as well as current best-evidence guidance, when developing materials under this Act to ensure that its resources are accurate, effective, and aligned with contemporary understanding of the issues at hand.

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

The inclusion of a private right of action through civil tribunals in the Change or Suppression (Conversion) Practices Prohibition Act 2021 is the most chilling form of speech regulation available, as it would expose faith leaders and pastoral care activities to catastrophic civil liability, merely for expressing sincerely held views or providing scripture-based guidance, thereby creating a powerful deterrent against any meaningful engagement with questions of sexual orientation or gender identity.

