

## 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.**

The Change or Suppression (Conversion) Practices Prohibition Act 2021 appears to prioritize intersectional politics over the identification and prevention of genuine harm in the community. This provision is problematic, as the overly broad definition of "change or suppression practice" unnecessarily captures harmless conduct, such as ordinary conversations and pastoral care, while failing to clearly define the coercive or abusive conduct that genuinely harms victims of conversion practice.

- 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.**

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

**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 raises significant concerns regarding its potential impact on religious freedom and the ability of faith leaders to engage in exploratory discussions with congregants, as the definition of prohibited conduct fails to clearly protect Socratic questioning and exploratory conversations that consider alternative possibilities, such as same-sex attraction, and may be necessary to rule out other diagnoses, including 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 Change or Suppression (Conversion) Practices Prohibition Act 2021 unduly restricts the exercise of professional judgment by clinicians, particularly those holding minority or faith-based perspectives, by presuming their views to be incompatible with or compromising of their clinical expertise. This provision, combined with the necessity exemption's higher threshold for non-affirming interventions and the express inclusion of psychotherapy as a prohibited activity, creates a chilling effect on clinical practice and undermines the ability of clinicians to provide evidence-based care that reflects the complexity and diversity of human experience.

**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 Change or Suppression (Conversion) Practices Prohibition Act 2021 contains a provision that merely cautions that faith practice may contravene the Act, leaving individuals and organisations uncertain about what is permissible. A pastor or faith-based counsellor who responds to a request for support from a person seeking to reconcile their faith with their same-sex attraction would risk liability under the Act, despite the individual having freely sought out that support. This represents an extraordinary intrusion into both religious freedom and individual autonomy, as it fails to cater for an LGB person of faith who consensually seeks support to live and practise their religion in accordance with their values and beliefs.

**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 prohibition on change or suppression practices as outlined in the Act is based on a contested clinical position that is not supported by the best available evidence, including the findings of the Cass Review. The consultation materials exacerbate this issue by employing language that characterises an excessively broad range of conduct as potentially prohibited, thereby producing a chilling effect that may deter healthcare professionals from providing necessary care and support to vulnerable individuals.

**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.**

**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 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 the information provided is accurate and safe for all individuals, particularly vulnerable young people, and that materials that uncritically adopt affirmation of gender identity as the only medically appropriate option are not promulgated, as they risk causing serious harm.

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

**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?**

**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?**

**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 costs on respondents, even those ultimately vindicated, imposes a significant deterrent against engaging in pastoral discussions about change or suppression practices, thereby unduly restricting freedom of expression and the exchange of ideas.



**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](#).