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Secretary
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**Dear Secretary** 

# RE: JUSTICE MISCELLANEOUS (CONVERSION PRACTICES) BILL 2024 – CONSULTATION DRAFT

Thank you for the opportunity to make a submission on the draft Justice Miscellaneous (Conversion Practices) Bill 2024. I have previously been involved in the community consultation process conducted by the Tasmania Law Reform Institute (TLRI) that was tasked with conducting an inquiry into law reform issues relating to sexual orientation and gender identity (SOGI) conversion practices in Tasmania. I maintain a commitment to monitoring and reviewing the Government's efforts to address the issues identified during that process and the ways it seeks to implement law reform initiatives. It is my strong view that effective law reform should include statutory prohibitions to protect against the harm associated with conversion practices, particularly as it relates to children and young people.

### **Background**

In November 2020, the TLRI released for community consultation Issues Paper No. 31 titled *Sexual Orientation and Gender Identity Conversion Practices*.<sup>1</sup> I provided a submission in relation to that Issues Paper on 9 February 2021.<sup>2</sup> Subsequently, the TLRI published Final Report No. 32, also titled *Sexual Orientation and Gender Identity Conversion Practices* in April 2022 ("the Final Report").<sup>3</sup>

The Government has now produced a consultation version of a draft Bill following the TLRI's Final Report. The *Justice Miscellaneous (Conversion Practices) Bill 2024* proposes amendments to two pieces of legislation, the *Police Offences Act 1935* (Tas) and the *Health Complaints Act 1995* (Tas). This submission assesses the amendments proposed by the Government generally in relation to whether they create a statutory prohibition to protect against the harm associated with conversion practices, particularly as it relates to children and young people; as well as specifically in the context of the 16 recommendations proposed in the TLRI Final Report.

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<sup>&</sup>lt;sup>1</sup> Tasmania Law Reform Institute (TLRI), Sexual Orientation and Gender Identity Conversion Practices, Issues Paper No. 31, November 2020 [URL: <a href="https://www.utas.edu.au/">https://www.utas.edu.au/</a> data/assets/pdf file/0005/1415669/tlri-sexual-orientation-and-gender-identity-conversion-practices-issues-paper-2020.pdf]

<sup>&</sup>lt;sup>2</sup> Commissioner for Children and Young People, Submission, 9 February 2021 [URL: ]

<sup>&</sup>lt;sup>3</sup> TLRI, Sexual Orientation and Gender Identity Conversion Practices, Final Report No. 32, April 2021 [URL: https://www.utas.edu.au/ data/assets/pdf\_file/0004/1585921/2022.CP.Report32.final.A4\_securedwcopy.pdf]



## **Role of the Commissioner for Children and Young People**

My perspective is governed by a child-rights framework and the United Nations Convention on the Rights of the Child. The *Commissioner for Children and Young People Act 2016* (CCYP Act), which establishes the office of the Commissioner for Children and Young People, provides that my general functions include:

- (a) advocating for all children and young people in the State generally;
- (c) researching, investigating and influencing policy development into matters relating to children and young people generally;
- (d) promoting, monitoring and reviewing the wellbeing of children and young people generally;
- (e) promoting and empowering the participation of children and young people in the making of decisions, or the expressing of opinions on matters, that may affect their lives; and
- (f) assisting in ensuring the State satisfies its national and international obligations in respect of children and young people generally.<sup>4</sup>

In performing these and other functions under the CCYP Act, the Commissioner is required to:

- do so according to the principle that the wellbeing and best interests of children and young people are paramount, and
- observe any relevant provisions of the United Nations Convention on the Rights of the Child (CRC).<sup>5</sup>

Further, the Commissioner must give special regard to the needs of children and young people who are vulnerable or disadvantaged. Relevantly, this is defined under the CCYP Act to include a child or young person who is *at risk* within the meaning of the *Children*, *Young Persons and Their Families Act 1997*. This is pertinent to the issue of law reform concerning *conversion practices*, because I am under a statutory duty to give special regard to children who have been, are being or are likely to be, abused or neglected.

#### **TLRI** consultation

As noted in the TLRI's Final Report, there was a very high level of public interest in the Institute's original consultation which received some 256 submissions and a joint submission endorsed by a petition with 377 signatures<sup>7</sup>. As a result, the TLRI's Issues Paper No. 31 and their Final Report No. 32 were, in my view, detailed, based on a wide-ranging consultation process that was heavily subscribed, exhaustively referenced and provided comprehensive consideration of the issue of conversion practices in Tasmania.

The TLRI made a careful enquiry of whether conversion practices cause harm and concluded that mainstream medical consensus in Australia was that these practices result in measurable harm across multiple wellbeing domains. I summarised these findings in my response<sup>8</sup> to the TLRI Issues Paper No. 31. The *Fact Sheet*<sup>9</sup> published by the Department of Justice to accompany the draft Justice Miscellaneous (Conversion Practices) Bill 2024 endorses this established position,

<sup>&</sup>lt;sup>4</sup> Section 8(1) of the Commissioner for Children and Young People Act 2016 (Tas)

<sup>&</sup>lt;sup>5</sup> Section 3(1) of the Commissioner for Children and Young People Act 2016 (Tas)

<sup>&</sup>lt;sup>6</sup> Section 3(2)(b) of the Commissioner for Children and Young People Act 2016 (Tas)

<sup>&</sup>lt;sup>7</sup> TLRI, Sexual Orientation and Gender Identity Conversion Practices, Final Report No. 32, April 2021, para 1.3.9, p. 5.

<sup>8</sup> Commissioner for Children and Young People, Submission, 9 February 2021

<sup>&</sup>lt;sup>9</sup> Tasmania Government, Fact Sheet – Justice Miscellaneous (Conversion Practices) Bill 2024 [URL: <a href="https://www.justice.tas.gov.au/">https://www.justice.tas.gov.au/</a> data/assets/pdf\_file/0003/737652/Fact-Sheet-Justice-Miscellaneous-Conversion-Practices-Bill-2024.pdf]



emphatically stating that the purpose of the Bill is to "give effect to the Government's commitment to ban harmful sexual orientation and gender identity conversion practices in Tasmania". The Fact Sheet quotes from the TLRI Final Report as follows:

The mainstream medical consensus is that:

- LGBTQIA+ attributes are not faults or dysfunctions;
- Conversion practices lack efficacy (they are not successful in doing what they claim to do in a safe or reliable way); and
- Conversion practices involve a significant risk of causing serious and lasting harm to those subject to them.<sup>10</sup>

Using this as its rationale, the Department's *Fact Sheet* states the case for legislative reform, noting that "given the absence of a medical basis for these practices, and their potential to cause harm, there is a clear need for regulation."<sup>11</sup> Accepting that there is an overwhelming consensus, both among the medical community and within Government, that conversion practices cause harm and that this warrants a statutory response, it is clear to me that there is no controversy as to the harmfulness of these practices: conversion practices are clearly and manifestly harmful.

It remains necessary for me to highlight the statutory mandate I have which is to act according to the best interests principle and to observe the provisions of the United Nations *Convention on the Rights of the Child.* As I stated in my original submission in response<sup>12</sup> to the TLRI Issues Paper No. 31:

The Committee on the Rights of the Child (the Committee) has emphasised 'the rights of all adolescents to freedom of expression and respect for their physical and psychological integrity, gender identity and emerging autonomy'. The Committee has specifically condemned practices designed to change sexual orientation and has urged States to eliminate ... those practices. The Committee is a specifically condemned practice of the Child (the Committee) has emphasised 'the rights of all adolescents to freedom of expression and respect for their physical and psychological integrity, gender identity and emerging autonomy'. The Committee has specifically condemned practices designed to change sexual orientation and has urged states to eliminate ... those practices.

In a report to the UN Human Rights Council, the UN Independent Expert on protection against violence and discrimination based on sexual orientation and gender identity (Independent Expert) found that subjecting children to so called "conversion therapies":

runs counter to States' obligation to protect them from violence, harmful practices and cruel, inhuman or degrading treatment, to respect the right of the child to identity, physical and psychological integrity, health and freedom of expression and to uphold the core principle of taking the best interests of the child as a primary consideration at all times.<sup>15</sup>

#### **TLRI** recommendations

In its Final Report, the TLRI made 16 interlocking recommendations for amendments to be made to several pieces of Tasmanian legislation including the *Mental Health Act 2013* (Tas), the *Health Complaints Act 1995* (Tas), the *Ombudsman Act 1978* (Tas), the *Anti-Discrimination Act 1998* (Tas),

<sup>10</sup> Ibid.

<sup>&</sup>lt;sup>11</sup> Ibid.

Commissioner for Children and Young People, Submission, 9 February 2021, p. 4 [URL: <a href="https://www.utas.edu.au/">https://www.utas.edu.au/</a> data/assets/pdf file/0007/1434373/120 Commissioner for Children Young People.pdf]

<sup>13</sup> Committee on the Rights of the Child. General comment No. 20 (2016) on the implementation of the rights of the child during adolescence, para. 34.

<sup>14</sup> Ihid

<sup>&</sup>lt;sup>15</sup> Madrigal-Borloz, V. *Practices of so-called "conversion therapy", Report of the United Nations Independent Expert on protection against violence and discrimination based on sexual orientation and gender identity* (May 2020), par 73.



the *Civil Liability Act 2002* (Tas) and the *Criminal Code Act 1924* (Tas). The TLRI's stated strategy was to give greater clarity to Tasmanian law and create a clear prohibition on conversion practices. The Final Report makes clear that any law reform response needed to be specifically adapted to and adjusted for the existing Tasmanian legal landscape. Having considered the harm caused by conversion practices, the drivers and context of conversion practices and the views of respondents to its initial consultation paper, the TLRI recommended that any law reform should be framed with reference to the following principles (emphasis added):

- I. The primary object of SOGI conversion practices law reform should be **individual**, **social** and systemic harm reduction.
- II. Law reform must accommodate Tasmanian circumstances. In particular, it should utilise existing statutory regimes to regulate SOGI conversion practices.
- III. Law reform should adopt a **proactive**, **preventative** and **proportionate** approach to harm reduction from SOGI conversion practices.
- IV. Regulatory powers should be **self-initiated** (i.e. they should not solely rely on complainants or victims coming forward).
- V. Where possible and practical **these authorities should coordinate**, within specific areas of competency, to reduce the prevalence of harm from SOGI conversion practices in the Tasmanian community.
- VI. Law reform should **modernise**, **standardise**, and, where clinically appropriate, **depathologise** language relating to sex and gender.
- VII. Punitive (criminal) measures should be measures of last resort and restricted to **wilful**, **reckless**, **repeated or malicious breaches of the law** that cause harm and/or contempt for statutory agencies and courts responsible for its enforcement.
- VIII. **Civil liability compensation** for harms caused by SOGI conversion practices should be provided for **after a transition period** of not more than 24 months from the date of proscription of the practices by law.<sup>16</sup>

This principled approach, which I generally endorse, provides the architecture that allows the TLRI to propose 16 mutually supporting recommendations that create an interconnected network of legal prohibitions and remedies across multiple domains. This includes the following:

- Amending the *Mental Health Act 2013* (Tas) to create a regulatory framework applicable to both professionals and non-professionals:
  - (a) to prohibit a person undertaking an assessment or treatment of a person's sexual orientation:
  - (b) to prescribe those professionals who may assess and treat mental health conditions relating to gender identity or expression and required clinical guidelines;
  - (c) to prohibit non-qualified persons from seeking to assess or treat people;
  - (d) to prohibit any person from seeking to conduct an assessment or treatment of a person in relation to their sexual orientation or gender identity unless expressly authorised by a Standing Order issued by the Chief Civil Psychiatrist;

<sup>&</sup>lt;sup>16</sup> TLRI, Sexual Orientation and Gender Identity Conversion Practices, Final Report No. 32, April 2022, p. 105. The two final paragraphs in this numbered list have both been numbered "VII" in the original Final Report seemingly in error. This has been corrected in this submission.



- (e) to authorise a variety of statutory officers (public health officers, statutory commissions, welfare and guardianship authorities, judicial officers and police) to receive and refer complaints of unauthorised assessment and treatment of SOGI attributes to the Health Complaints Commissioner or Ombudsman, and to authorise the Health Complaints Commissioner or Ombudsman to investigate matters (Recommendations 1, 2, 3, 4, 5, and 6);
- Amending the *Health Complaints Act 1995* (Tas):
  - (a) to have conversion practices included in the definition of a *health service* in Schedule 1 of the Act;
  - to include anti-discrimination provisions based on grounds of sexual orientation and gender identity and to stipulate that a person's sexual orientation or gender identity are not pathological conditions;
  - (c) to update the Charter of Health Rights to adopt these new rights; and
  - (d) to allow the Health Complaints Commissioner to investigate and report all findings of SOGI conversion practices to the Chief Civil Psychiatrist (Recommendations 7, 8 and 9);
- Amending the Anti-Discrimination Act 1998 (Tas):
  - (a) to include a deeming provision stipulating that a public act promoting conversion practices amounts to incitement of hatred towards, serious contempt for or severe ridicule of another person on grounds of sexual orientation or gender identity;
  - (b) to facilitate the Anti-Discrimination Commissioner being able to cooperate and coordinate with other offices and agencies in investigations into conversion practices; and
  - (c) to include provisions allowing the Commissioner to accept a complaint beyond the 12 months limitation period (Recommendations 10, 11 and 12);
- Amending the Civil Liability Act 2002 (Tas):
  - (a) to include a provision setting out the elements of SOGI conversion practices under tort law; and
  - (b) to include a deeming provision stipulating that conversion practices constitute a form of child abuse, and establishing a scheme making an organisation vicariously liable if it did not take reasonable precautions to prevent a person associated with the organisation perpetrating a conversion practice (Recommendations 13 and 14); and
- Amending the *Criminal Code Act 1924* (Tas) to make it a criminal offence to perpetrate conversion practices that cause serious physical or mental harm (Recommendation 15);
- Finally, the TLRI proposed funding be given to a variety of community legal, medical, LGBTQIA+ and religious organisations for education and support campaigns, although this recommendation is not amenable to being made the subject of a legislative amendment (Recommendation 16).



In my original submission in response to the TLRI's Issues Paper, I stated that "to be effective, any reform should be **comprehensive and multi-faceted in its approach**" <sup>17</sup> (emphasis added). I clarified this as follows:

By multi-faceted I mean that any approach to regulating SOGI conversion practices should encompass a range of responses. The Independent Expert has made recommendations on how States should implement a ban on so called "conversion therapies", including by:

- clearly defining the prohibited practices and ensuring public funds are not used to support them;
- banning advertising of and the carrying out of conversion practices in health-care, religious, education, community, commercial and other settings;
- establishing a system of sanctions for non-compliance commensurate with the gravity of the non-compliance;
- creating monitoring, support and complaint mechanisms with access to reparation, rehabilitation and legal assistance for victims.<sup>18</sup>

Further, and specifically in relation to children and young people, the Independent Expert has recommended that States:

Take urgent measures to protect children and young people from practices of "conversion therapy", including by giving priority to the design and implementation of monitoring programs for health-care, religious, education, community, commercial and any other settings, public or private, where children and young people are deprived of their liberty by organs such as national human rights institutions or, if applicable, national preventive mechanisms.

Carry out campaigns to raise awareness among parents, families and communities about the invalidity and ineffectiveness of, and the damage caused by, practices of "conversion therapy". 19

In my view, the interconnected suite of recommendations made by the TLRI in its Final Report that made provision for multiple legal remedies represented precisely the sort of comprehensive and multi-faceted approach that I encouraged in my original submission.

#### The Tasmanian Government's draft Bill

The Tasmanian Government has seemingly disregarded the multi-dimensional interconnectedness of the TLRI's 16 recommendations and has included just two of the TLRI's proposed remedies in an altered form.

First, the Government proposes to amend the *Health Complaints Act 1995* to amend the definition of *health services* with the apparent purpose of capturing SOGI conversion practices. Unfortunately, this amendment is limited, in that it modifies the existing complaint-resolution scheme provided by that Act without, at the same time, making the necessary accompanying amendments that the TLRI proposed to the *Mental Health Act 2013*. This results in a light touch approach to law reform, in that

Commissioner for Children and Young People, Submission, 9 February 2021, p. 6 [URL: <a href="https://www.utas.edu.au/">https://www.utas.edu.au/</a> data/assets/pdf file/0007/1434373/120 Commissioner for ChildrenYoung People.pdf]

Madrigal-Borloz, V. Practices of so-called "conversion therapy", Report of the United Nations Independent Expert on protection against violence and discrimination based on sexual orientation and gender identity (May 2020), para 87.

19 Ibid.



the TLRI's proposal to implement multi-faceted reform of Tasmanian law overall is left without any teeth in terms of the statutory regulation of those persons engaged in or purporting to engage in the assessment or treatment of issues relating to sexual orientation or gender identity. Additionally, given that the scheme established by the *Health Complaints Act 1995* relies on complaints being made by persons who have been the recipients of treatment by health services, I hold significant concerns as to the capacity or likelihood of children and young people to seek justice when they have been the victims of a conversion practice.

Second, the Government proposes to amend the *Police Offences Act 1935* to create two offences, comprising (a) carrying out a conversion practice and (b) promoting or advertising conversion practices. This represents a departure from the TLRI Final Report which had recommended that the introduction of a criminal provision should be made by amending the *Criminal Code Act 1924*. As indicated by the Tasmanian Commission of Inquiry into the Tasmanian Government's Responses to Child Sexual Abuse in Institutional Settings (the Commission of Inquiry), serious child abuse offences should be given a greater profile by being placed in the *Criminal Code*. The draft Bill opts to create a summary offence in the *Police Offences Act 1935*. This is inconsistent with what we learned from the Commission of Inquiry.

Each of these proposed innovations, as drafted, are fraught with problems. There are multiple exceptions and defences included in the offence provision relating to the carrying out of a conversion practice. The result is that the draft Bill appears to detail the circumstances under which conversion practices are acceptable, rather than banning conversion practices because they are harmful, which is the stated intention of the draft Bill. Additionally, while the draft Bill prohibits the publication or display of advertising that promotes conversion practices, it fails to address the fact that conversion practices are invariably promoted covertly (e.g. by word-of-mouth) rather than through public advertising. Covert communications which promote conversion practices are in themselves an indirect form of conversion practice and should be addressed through law reform.

I am genuinely perplexed as to why the Government has not fully engaged with the interconnected network of recommendations made by the TLRI. There is, in my view, no satisfactory reason why SOGI conversion practices should not be the subject of a deeming provision, as recommended by the TLRI, that stipulates that these practices constitute *child abuse*. This should be accompanied by a provision that makes any corporate body liable for failing to take reasonable precautions to prevent the activities of any person employed or associated with the organisation who engages in conversion practices in respect of a child. As recommended in the TLRI Final Report, there should be a consequential amendment to the *Limitation Act 1974* (Tas) to provide that personal injury actions seeking compensation for harms caused as a result of conversion practices committed against a child are not subject to any limitation period.<sup>20</sup>

#### The Government's statements in Hansard

An analysis of the Government's public commentary relating to the work of the TLRI includes the following:

• In April 2022, following the release of the TLRI Final Report, Premier Rockliff was reported as saying in Parliament:

I support acting on the recommendations of the law reform institute report. (...) The attorney and I are working together on these matters. I will be leading the change. (...) I'm not going to have 16 recommendations and do nothing – I can tell

<sup>&</sup>lt;sup>20</sup> TLRI, Sexual Orientation and Gender Identity Conversion Practices, Final Report No. 32, April 2021, p 169 [URL: <a href="https://www.utas.edu.au/\_data/assets/pdf\_file/0004/1585921/2022.CP.Report32.final.A4\_securedwcopy.pdf">https://www.utas.edu.au/\_data/assets/pdf\_file/0004/1585921/2022.CP.Report32.final.A4\_securedwcopy.pdf</a>].



you that right now. I'll be introducing legislation to the Parliament that gives effect to the recommendations.<sup>21</sup>

• Five months later, the Premier again welcomed the TLRI Report in Parliament and stated:

It is concerning to hear of any practices in the community of this nature and our Government takes it very seriously. I have considered the report and have met personally with people who have been subjected to conversion practices in the past. I acknowledge the harm and distress that these practices cause. Our Government wants Tasmania to be a place where everyone feels valued, encouraged, supported and included to be the best they can be.<sup>22</sup>

• The Premier reiterated this opinion in Parliament the following year on 5 June 2023. When challenged as to delays in introducing legislative reform, the Premier noted that the Government had further decisions to make "on the basis of expert advice and best practice." When asked to clarify what decisions the Government had to make, the Premier stated:

The decisions of the aspects of the legislation. So, there is the ban need. But there is also the need, in a policy and legislative sense, to ensure that we're not impinging on people's rights to freedom of speech and prayer, and those matters that have been raised by others in the community.<sup>24</sup>

In this regard, I take the opportunity to repeat what I stated in my original response to the TLRI Issues Paper. I said:

In my opinion, it is particularly important to reiterate that the right to manifest one's belief or religion is qualified because of the potential for a person to manifest their religion or beliefs in ways that infringes on the fundamental rights and freedoms of others. See Article 18(3) of the International Covenant on Civil and Political Rights and Article 14(3) of the Convention on the Rights of the Child).<sup>25</sup>

The established legal position in this country is that rights to speech and freedom of religion are not absolute rights. They are, and must be, regulated and restricted whenever and to whatever extent they cause harm. As noted earlier, the harmfulness of these practices is not in dispute. In my view, the qualified rights to freedom of speech and freedom of religion can never be relied upon to provide a rationale to justify or excuse harm being perpetrated on any person, and in particular, on children and young people.

Following the release of the final report of the Commission of Inquiry in September 2023, there was unanimous agreement by all members of Parliament enthusiastically supporting the implementation of all 191 recommendations of the Commission.

Upon the release of the TLRI Final Report in April 2022 the Premier made very robust statements in Parliament in support of the recommendations of the Report and committed to effective legislative change. With the release of this draft Bill on conversion practices, the Government's *Fact Sheet* emphatically stated that the proposed amendments were to give effect to the Government's

<sup>&</sup>lt;sup>21</sup> Hansard (House of Assembly) Estimates Committee A, 6 June 2022, pp 45-46.

<sup>&</sup>lt;sup>22</sup> Hansard (House of Assembly) 24 November 2022, pp 20-21.

<sup>&</sup>lt;sup>23</sup> Hansard (House of Assembly) Estimates Committee A, 5 June 2023, pp 44-47.

<sup>&</sup>lt;sup>24</sup> Ibid.

<sup>&</sup>lt;sup>25</sup> Commissioner for Children and Young People, Submission, 9 February 2021, p. 3 [URL: <a href="https://www.utas.edu.au/">https://www.utas.edu.au/</a> data/assets/pdf file/0007/1434373/120 Commissioner for ChildrenYoung People.pdf].



commitment "to ban harmful sexual orientation and gender identity conversion practices in Tasmania (...)".<sup>26</sup>

It is therefore, in my view, incongruent of the Government to be providing expressions of strong support for the exhaustive recommendations made by the TLRI Report, while at the same time releasing a dilute, weakened set of amendments that fail to align genuinely with the recommendations that were supposed to inspire the Bill. There is a fundamental disconnect between the Bill and the TLRI Final Report that is in no way harmonised by the Government's stated commitment to ban conversion practices. Despite acknowledging the harmfulness of conversion practices, the Government's approach to law reform as evidenced by the Justice Miscellaneous (Conversion Practices) Bill 2024 is simply not consistent with the previously stated commitment to cultural change in the slipstream of the Commission of Inquiry recommendations. Additionally, it is difficult to see how the Government's compromised approach to conversion practices is commensurable with the existing legal landscape in Tasmania, particularly now that the *Child and Youth Safe Organisations Act 2023* is operational, where, under the lens implemented by this legislation, conversion practices could not but be characterised as *reportable conduct* for the purposes of that Act.

In my view, there is more work to be done in order to achieve the purpose and intent of law reform in the area of SOGI conversion practices. I urge the Government to reconsider the terms of this draft Bill with reference to the interconnected recommendations of the TLRI Final Report, and I would be very happy to engage in further discussions in order to achieve meaningful reform in this area.

Yours sincerely

Leanne McLean

Commissioner for Children and Young People

cc The Hon Jeremy Rockliff, Premier
The Hon Guy Barnett, Attorney General
The Hon Roger Jaensch, Minister for Education, Children and Youth

<sup>&</sup>lt;sup>26</sup> Tasmania Government, Fact Sheet – Justice Miscellaneous (Conversion Practices) Bill 2024 [URL: <a href="https://www.justice.tas.gov.au/">https://www.justice.tas.gov.au/</a> data/assets/pdf\_file/0003/737652/Fact-Sheet-Justice-Miscellaneous-Conversion-Practices-Bill-2024.pdf]