Response to the proposed *Conversion Practices Prohibition Bill*

1. This response is on behalf of and signed by:

- Anglican Diocese of Tasmania
- Australian National Imams Council
- Shia Muslim Council of Australia
- Coptic Orthodox Church
- Australian Baptist Ministries
- Australian Christian Churches
- Seventh Day Adventist Church, Australia
- Presbyterian Church of Tasmania
- The Salvation Army, Tasmania
- International Network of Churches
- Acts Global Churches
- Hillsong Church
- Full Gospel Australia
- Fellowship of Independent Evangelical Churches
- Australian Association of Christian Schools
- Freedom for Faith

Executive Summary

2. The signatories support laws that protect people from coercive and abusive practices. However, this draft goes much further. Its broad definition of "conversion practice" may capture a single conversation, prayer or act of parental or religious guidance, even where it is consensual and causes no harm. The purported protections for parents and faith communities are circular, rendering them ambiguous at best, and ineffective at worst.

3. The consequences are serious. Conduct involving a child may be treated as "child abuse" and can attract indictable criminal liability without proof of injury. The draft also creates broad organisational liability and gives the Anti-Discrimination Commissioner extensive investigative and enforcement powers over conduct that may be harmless and consensual.

4. The draft also departs substantially from the more targeted health-based model recommended by the Tasmanian Law Reform Institute and raises significant concerns for religious freedom, parental rights and Tasmania's constitutional guarantee of freedom of religion.

5. The draft should not proceed in its current form. It should be narrowed to genuinely coercive, abusive or harmful conduct, with clear protections for parents, faith communities, consensual assistance, prayer, and ordinary religious teaching.

Definition of Conversion Practices

6. Section 5 contains the central operative definition in the draft. Its breadth is particularly important because the same definition applies not only to the criminal offences in Part 2, but also to the civil response scheme, investigations, compliance notices, advertising offences, organisational liability and the consequential amendments concerning child abuse.

7. While the definition provided in the draft legislation appears to be based on the South Australian model, it has critical alterations that significantly broaden the definition, capturing a wide range of innocent non-harmful activity – including basic religious teaching and practice.

Single incidents

8. Firstly, the definition captures a single action or isolated incident. Section 5 refers simply to any "practice or conduct", without requiring repetition, a course of conduct, treatment, or a sustained effort. A single conversation, prayer, counselling session or other act may therefore fall within the definition. This is a significant departure from the South Australian Act, which requires a "practice, treatment or sustained effort" involving more than one event or occasion. The South Australian threshold provides an important safeguard by distinguishing systematic or sustained conversion practices from isolated religious, parental or pastoral interactions. The absence of any equivalent limitation in the draft creates uncertainty and materially increases the risk that ordinary conduct will be treated as unlawful.

Excluding consent

9. Secondly, the definition expressly applies "whether with or without the person's consent". This is broader than the approach taken in other Australian jurisdictions. In NSW and South Australia, the definition first identifies the conduct that constitutes a conversion practice. The legislation then separately provides, in relation to specified criminal offences, that the particular offence may be committed whether or not the recipient consented.

10. The distinction is significant. A provision stating that consent is not a defence to a criminal charge prevents a person from escaping liability for criminal conduct merely because the recipient agreed to participate. It does not require the law to treat consensual conduct as indistinguishable from coercive conduct for every other purpose. Placing the provision in the definition, however, makes consent irrelevant across the draft's entire civil, administrative and regulatory scheme. It applies not only to the criminal offences, but also to reports, investigations, compliance notices, enforceable undertakings, advertising restrictions, organisational liability and the characterisation of conduct towards children as child abuse.

11. This is especially concerning in relation to competent adults who voluntarily seek pastoral counselling, prayer or assistance to live consistently with their religious beliefs. The adult's

informed and continuing request for that assistance cannot prevent the conduct from being classified as a conversion practice. Even where no offence is committed because no injury occurs, the conduct may still attract the civil response scheme and the Commissioner's investigative and enforcement powers.

Suppression and inducement

12. Thirdly, the definition extends beyond conduct intended directly to change, suppress or eradicate a person's sexual orientation or gender identity to conduct intended to "induce" the person to do so themselves. This additional concept is vague and expands the scope of the definition. It may capture advice, encouragement, or the communication of religious or moral expectations, even where the person remains free to accept or reject what is said. In a religious context, a simple conversation about living consistently with a person's beliefs could be alleged to induce the person to suppress aspects of their sexuality or gender identity. The term therefore risks extending the draft beyond coercive or harmful practices to ordinary religious teaching and pastoral guidance.

Narrowed health service protections

13. Fourthly, the health-service exclusion has been narrowed significantly. Although s 5(3)(a) largely adopts the clinical appropriateness test used in South Australia and New South Wales, the draft restricts this by defining a "registered health practitioner" as a person registered "to practise in the medical profession". This appears to confine the protection to medical practitioners and exclude psychologists and other registered health professionals who commonly provide counselling, assessment and treatment concerning sexuality or gender identity. The draft also omits the clarifying examples included in the South Australian and New South Wales legislation, including assistance to explore sexual orientation or gender identity and advice about the potential effects of gender-affirming treatment. These omissions create unnecessary uncertainty for both practitioners and patients and should be corrected by adopting the broader interstate wording.

Circular and ineffective protections for parents and faith communities

14. Finally, the purported exemption in s 5(3)(c) is circular and therefore effectively meaningless. It provides that specified religious and parental conduct is not a conversion practice, but only where that conduct is "not engaged in as part of a conversion practice". In substance, the provision says that something is not a conversion practice unless it is a conversion practice. It does not create any independent protection for prayer, religious teaching, pastoral care or parental discussion, because the exemption only operates after the central question has already been answered. If the conduct is found to fall within the broad definition in s 5(1), the exemption disappears; if it does not, the exemption was unnecessary. The provision therefore creates the appearance of protection without providing any substantive safeguard.

15. This is materially weaker than the South Australian formulation. The SA Act separately excludes the use, "without more", of prayer and expressions of belief. Although

interpretive questions may remain, the SA provisions do not use the same overtly circular formulation adopted in s 5(3)(c).

16. A genuine exclusion should identify protected conduct by reference to objective characteristics. At a minimum, the words “provided the conduct is not engaged in as part of a conversion practice” should be removed. Otherwise, s 5(3)(c) creates the appearance of religious-freedom protection without providing any actual legal safeguard.

17. In relation to the list of protected practices, the draft appears to be based on the South Australian legislation, however it has made some significant changes that change the scope and meaning of the protections. In doing so, it imports some of the weaknesses of the South Australian approach, and magnifies them further.

18. Paragraphs (i) and (ii) concern an expression, including through prayer, of a belief or principle, and an expression that a belief or principle ought to be followed or applied. These largely reproduce s 4(3)(c) of the South Australian Act. However, these provisions protect only the expression itself. They do not expressly protect pastoral care that explains how a belief applies to an individual’s circumstances, encourages a person to act consistently with that belief, or supports a person who has voluntarily decided to do so. There is therefore a significant gap between protecting the statement of a religious belief and protecting the ordinary pastoral activities through which that belief is taught and applied.

19. Paragraph (iii) protects “stating what relevant religious teachings are, or what a religion says, about a specific topic” which is confined to stating the content of religious teaching. It does not expressly protect explaining, advocating, applying or providing guidance in accordance with that teaching. A faith leader may therefore be protected when describing a doctrine in the abstract, while facing uncertainty when responding to an individual who asks how that doctrine should shape their conduct. This creates an artificial distinction and misunderstands the nature of religion, because religious teaching commonly includes both explaining what a faith teaches and encouraging adherents to live consistently with it.

20. This creates particular uncertainty for religious pastoral care. Many religious traditions distinguish between a person’s attractions or identity and the conduct through which the person chooses to express their beliefs. A minister may therefore counsel a person about chastity, sexual conduct, marriage or religious discipline without purporting to alter the person’s underlying attractions. Nevertheless, such counselling could be alleged to have the purpose of inducing the person to “suppress” their sexual orientation. The definition provides no objective threshold separating abusive conversion practices from ordinary religious advice and moral formation.

21. The protection in Paragraph (iv) is limited to the “making, application or communication” of “general” requirements. It is unclear whether it protects the individual application or enforcement of those requirements, such as counselling a particular member or leader, determining whether a person remains eligible for leadership, or asking that person to comply with the community’s standards. A religious organisation must be free not merely

to publish general standards, but also to apply them fairly and consistently to individual members and leaders.

22. Paragraph (v) is materially narrower than the South Australian protection for parents. The draft refers only to parents "discussing" matters relating to sexual orientation, gender identity, sexual activity or religion with their children. The South Australian Act expressly protects parents both "discussing" and "providing guidance on" those matters. Parenting necessarily involves more than neutral discussion. It includes teaching values, giving advice, setting expectations and guiding children's conduct in accordance with the family's religious and moral beliefs. Omitting "providing guidance" creates uncertainty about whether parents may do more than describe competing views without expressing or implementing their own considered guidance.

23. The draft also omits the South Australian protection for "general rules in educational institutions". This omission is significant for religious schools. Such schools commonly maintain general standards concerning student conduct, relationships, sexuality, uniforms, facilities and participation in religious life.

24. The exclusions in this legislation need to be strengthened significantly. They should protect not only the abstract expression of religious beliefs, but also their good-faith explanation, teaching and application – in faith communities, schools and the family home.

Defining all "conversion practices" as child abuse

25. One of the most far-reaching elements of the draft legislation is that it amends the *Limitation Act 1974* and the *Civil Liability Act 2002* so that conduct falling within the definition of conversion practice is treated as a form of "child abuse" for important civil-law purposes. This places conduct captured by the draft in the same legal category as sexual abuse, physical abuse and associated psychological abuse.

26. That classification is exceptionally broad. A conversion practice under s 5 may consist of a single conversation, prayer or act of religious guidance. It need not involve coercion, repetition, treatment, serious harm or any injury at all. Nevertheless, where that conduct is directed towards a child, it may be legally classified as child abuse even though it bears little resemblance to the grave conduct for which Tasmania's special child-abuse laws were originally enacted.

27. The amendment to the *Limitation Act 1974* gives claims arising from alleged conversion practices the exceptional treatment afforded to child-abuse proceedings. Ordinary limitation periods may therefore not apply, allowing claims to be commenced many years or decades after the alleged interaction. This has serious consequences for the reliability and fairness of proceedings. A parent, religious leader, teacher or spiritual adviser may be required to defend an allegation about a conversation or prayer that occurred decades earlier, when memories have faded, witnesses are unavailable and records were never

created or have been lawfully destroyed. These difficulties are particularly acute where the alleged conversion practice consisted of informal speech rather than a documented program or treatment.

28. The amendment to the *Civil Liability Act 2002* may also engage the special institutional-liability regime applying to organisations responsible for children. Churches, temples, mosques, schools, charities and other organisations may be required to take "reasonable precautions" to prevent associated individuals from engaging in conduct newly classified as child abuse. In some proceedings, an organisation may be presumed to have breached its duty unless it proves that it took "reasonable precautions" to prevent the conduct.

29. The special rules concerning vicarious liability may also become relevant. Religious and educational organisations may face liability for conduct by employees or persons performing roles akin to employees where their position gave them authority over, the trust of, or an ability to achieve intimacy with the child. These provisions were designed to respond to the distinctive circumstances in which grave institutional abuse occurs. Extending them to a single harmless conversation or prayer would substantially alter their purpose and reach.

30. The consequences may extend beyond the immediate civil claim. Organisations may need to revise safeguarding policies, staff and volunteer training, supervision, record-keeping, complaint procedures and insurance arrangements to treat alleged conversion practices as child abuse. Religious organisations may feel required to record or monitor private spiritual-care conversations, restrict discussions concerning sexuality and gender, or prohibit requested consensual religious guidance.

31. The terminology itself will also have significant effects. An allegation that a person engaged in "child abuse" carries an exceptional stigma. It may affect employment, volunteer participation, professional standing, working-with-children arrangements, insurance decisions and the reputation of both the individual and the organisation, even before any court has found that unlawful conduct occurred.

32. This raises the risk that the legal consequences attached to the label "child abuse" may progressively extend beyond the specific amendments. Regulators, insurers, schools and child-safety bodies may understandably rely upon Parliament's classification when determining what conduct must be prevented, reported, investigated or sanctioned. Conduct that is not abusive in any ordinary sense may therefore be treated throughout institutional systems as equivalent to sexual or serious physical abuse.

33. There is an important distinction between prohibiting conduct Parliament considers inappropriate and declaring that all such conduct is child abuse. The latter classification should be reserved for conduct possessing the essential characteristics of abuse, including coercion, exploitation, serious mistreatment or demonstrable harm. It should not attach automatically to every alleged conversion practice directed towards a child.

Mismatch between child-abuse classification and administrative enforcement

34. The draft creates a fundamental tension between the seriousness of the legal classification it adopts and the informality of the process through which allegations may be investigated and resolved.

35. If conduct is sufficiently grave to be classified by law as "child abuse", allegations should ordinarily be dealt with through the established child-protection and criminal justice systems. That would involve investigation by appropriately trained authorities, referral to police where necessary, prosecutorial oversight by the Director of Public Prosecutions, and determination by a court applying established rules of evidence and criminal procedure.

36. By contrast, the draft permits allegations concerning the same conduct to be dealt with through an administrative scheme overseen by the Anti-Discrimination Commissioner. That scheme may be initiated by a third-party report, is not confined to conduct causing harm, and allows the Commissioner to investigate, compel information, seek undertakings, issue compliance measures and publish outcomes.

37. The draft therefore combines the gravity and stigma of a child-abuse allegation with the flexibility and discretion of an administrative regulatory process. A parent, faith leader or organisation may be investigated in relation to conduct legally categorised alongside sexual and physical abuse, even though no court has found that abuse occurred and the alleged conduct may consist only of a single conversation, prayer or act of guidance that caused no injury.

38. These two approaches are fundamentally inconsistent. If conversion practices are to remain within an administrative education and resolution scheme, they should not attract criminal liability or be classified as child abuse without proven harm. Conversely, if Parliament considers the conduct sufficiently serious to warrant that classification, allegations should be dealt with through the mainstream judicial and child-protection systems, with the safeguards appropriate to allegations of such gravity.

Criminal Offences

Section 9 - Offence of engaging in one or more conversion practices that cause injury

39. Section 9(1)(b) and 9(2)(b) apply not only where a conversion practice causes injury, but also where the person engaging in the practice is reckless as to whether it will cause injury.

40. This is a significant departure from the harm-based offences enacted in South Australia and New South Wales. In South Australia, the criminal offence applies where a conversion practice actually "causes serious harm" to the individual. The New South Wales offence similarly requires proof that the conversion practice caused mental or physical harm that endangered the individual's life or was substantial. These are appropriate thresholds for criminal prosecution.

41. The concept of "injury" also appears to set a lower threshold than other legislation. South Australia requires "serious harm", while New South Wales requires harm that endangers life or is substantial. Section 9 does not use either of those limiting formulations. The draft therefore permits criminal liability for temporary injury and for injury falling materially below the serious or substantial harm thresholds adopted interstate.

42. The recklessness limb, combined with this low threshold for injury, is especially concerning. It is frequently asserted by advocates that any attempt to discourage, question or counsel against the expression of a person's sexual orientation or gender identity is inherently harmful. If that proposition is accepted by investigators, prosecutors or courts, a person who engages in any conduct falling within the definition of conversion practice could readily be said to have been aware of a risk of injury – particularly where "injury" is left at an unspecified and apparently low threshold. Any such conversation or pastoral engagement could then be characterised as reckless, even where the recipient suffered no actual injury and the conduct was consensual, non-coercive and undertaken in good faith.

43. In effect, once conduct is classified as a conversion practice, the alleged risk of harm associated with such practices itself might be used to establish recklessness and therefore criminality.

44. This creates a serious risk that any alleged conversion practice, including a single conversation or prayer, could attract criminal liability on the basis of a general claim that such conduct carries some possibility of psychological injury. There would be no need to prove that the particular conduct was coercive or abusive, that the risk was substantial, or that any injury actually occurred.

45. A person may therefore potentially be convicted even though the alleged recipient suffered no injury, made no complaint of injury and experienced no adverse consequence. That approach would substantially collapse the distinction between conduct falling within the general definition of conversion practice and conduct sufficiently serious to justify criminal punishment.

Conversion practices directed towards a child

46. Section 10 creates an indictable offence whenever an adult intentionally engages in a conversion practice directed towards a person under 18 years of age. The offence does not require proof that the conduct caused injury, created a risk of injury, or was reckless as to injury. Section 10(2) expressly confirms that it is unnecessary to prove that the child suffered any injury. The offence therefore criminalises the conduct solely because it falls within the extremely broad definition of conversion practice and is directed towards a child.

47. This is a radical departure from the harm-based approach adopted in South Australia and New South Wales. Those jurisdictions do not create a separate criminal offence covering every conversion practice directed towards a child. Their principal criminal offences require proof that the practice actually caused serious or substantial mental or physical

harm, or endangered the recipient's life. The seriousness of the consequence provides the justification for the imposition of criminal punishment. By contrast, s 10 removes the requirement to establish any harmful consequence merely because the recipient is under 18.

48. The concern is compounded by the breadth of the underlying definition. A conversion practice may consist of a single action or isolated incident, including potentially a conversation, prayer or counselling session, regardless of consent. It need not involve coercion, treatment, sustained pressure, repetition or abuse. Section 10 therefore permits an indictable prosecution arising from a single interaction with a child, even where the interaction was non-coercive, undertaken in good faith and caused no injury whatsoever.

49. The provision presents particular risks for parents. The parental exclusion in s 5(3)(c)(v) refers only to parents "discussing" sexuality, gender identity, sexual activity or religion with their children, and is in any event subject to the circular qualification that the discussion must not be part of a conversion practice.

50. A parent's single conversation with their own child could therefore attract indictable criminal liability, even where the conversation is loving, entirely consensual, undertaken in good faith and causes no injury whatsoever.

Extraterritorial application

51. The draft gives the prohibition an unusually broad operation beyond Tasmania. Section 6 applies where conduct occurs outside, or partly outside, Tasmania and there is a "real and substantial link" between the conduct and Tasmania. The conduct is then treated as though it occurred wholly within Tasmania. A link is expressly established where the conduct occurs entirely outside Tasmania but its effects occur wholly or partly within Tasmania. The draft therefore seeks to regulate conduct undertaken lawfully in another Australian jurisdiction merely because some subsequent effect is experienced in Tasmania.

52. Some extraterritorial operation may be justified to prevent a person deliberately avoiding Tasmanian law by relocating an abusive program across the border. However, the breadth of s 6 must be considered together with the exceptionally low threshold for a "conversion practice". The definition does not require a program, treatment, repeated conduct, coercion or harm. A single conversation, prayer or pastoral meeting outside Tasmania may be sufficient. The extraterritorial provision is therefore not confined to organised attempts to evade the law, but may apply to an isolated interaction occurring wholly in another State.

53. For example, a Tasmanian resident might travel to NSW to meet a minister, friend or family member and have a single conversation about sexuality, gender, chastity or religious belief that was perfectly legal in that State. If the conversation is later alleged to have induced the person to suppress their sexual orientation or gender identity, it may satisfy the definition of conversion practice. If the person subsequently experiences some alleged "effect" after returning to Tasmania, s 6 may permit the entire conversation to be

treated as having occurred in Tasmania. Then a NSW resident may become subject to Tasmanian criminal, civil and investigative processes despite remaining in another State and engaging in conduct that occurred wholly there and was completely legal.

54. The word "effects" is not limited to injury, serious harm or any objectively verifiable consequence. Nor does s 6 expressly require that the effects be substantial, intended or reasonably foreseeable. In the context of conversations concerning personal identity or religious beliefs, almost any later emotional or psychological response might be alleged to be an effect occurring in Tasmania. The provision therefore gives little practical guidance about when an interstate individual becomes subject to Tasmanian law simply by talking to their Tasmanian friend.

Removal of a person from Tasmania

55. Sections 11 and 12 create additional indictable offences concerning the removal of a person from Tasmania. Section 11 applies where a person takes, or arranges for another person to be taken, outside Tasmania intending that a conversion practice occur there, the practice does occur, and it either causes injury or the accused is reckless as to whether it will cause injury. As with s 9, the alternative recklessness limb means that no actual injury need be established.

56. The breadth of s 11 is amplified by the fact that taking a person interstate need not involve force, deception or coercion. On its face, it may include helping a willing adult arrange travel to meet a pastor, counsellor or religious community. Because consent is not a defence under the draft, the offence may apply even where the adult independently wishes to travel, freely requests the meeting and participates voluntarily. A person who purchases a ticket, drives the recipient across the border or otherwise assists with the arrangements may potentially be exposed to criminal liability if a single conversation occurring at the destination is later classified as a conversion practice.

57. Section 12 is broader still where the person taken from Tasmania is a child. The prosecution need only prove that the accused took or arranged for the child to be taken from Tasmania, intended that a conversion practice occur, and that a conversion practice in fact occurred outside Tasmania. The draft expressly provides that it is unnecessary to prove that the child suffered injury.

58. A parent could therefore potentially commit an indictable offence by taking their child interstate to visit relatives, attend a religious conference or meet a religious leader, if a single conversation or prayer concerning sexuality or gender occurs and is characterised as a conversion practice. The trip need not be coercive, the child may have requested the conversation, and no injury need result.

Offence of advertising conversion practices

59. Section 13 creates an offence where a person publishes or displays, or authorises the publication or display of, an advertisement or other notice that indicates – or could reasonably be understood as indicating – that any person intends to engage in one or more conversion practices.

60. The breadth of this offence reflects the breadth of the underlying definition. Because a conversion practice may comprise a single conversation, prayer or act of pastoral care, s 13 is not confined to advertisements for organised programs, therapies or commercial services.

61. The reference to an "advertisement or other notice" is particularly broad. It is not limited to paid or commercial advertising, nor to material directed towards recruiting a person into a formal program. An ordinary notice describing the availability of prayer, spiritual support or pastoral counselling may fall within the provision if it could reasonably be understood as indicating that someone intends to engage in conduct captured by s 5.

62. The offence also does not require the publication expressly to offer a conversion practice. It is sufficient that the material **could reasonably be understood** as indicating such an intention. Liability may therefore depend upon how a third party, investigator or court interprets ambiguous religious language rather than upon what the publisher expressly offered. Statements about assisting people to live consistently with religious teaching, supporting chastity, overcoming sexual temptation or receiving prayer concerning sexuality may be interpreted as indirectly indicating an intention to induce suppression.

Offences by employers

63. Section 16 creates exceptionally broad criminal liability for employers and principals. Where an employee or agent commits any offence under the draft, the employer or principal is taken to have committed the same offence. For this purpose, "employee" expressly includes not only an ordinary employee, but also a contractor and a volunteer. The provision would therefore apply directly to churches, religious schools, charities and other faith-based organisations that rely extensively upon ministers, chaplains, pastoral carers, youth leaders and other volunteers.

64. This is not confined to circumstances in which the organisation authorised, encouraged or even knew about the conduct. Liability arises automatically from the offence of the employee or agent, subject only to the organisation proving that it could not, despite taking all reasonable precautions and exercising all due diligence, have known of or prevented the offence. The draft therefore reverses the ordinary position by deeming the employer guilty and placing the burden upon it to establish a defence.

65. That is particularly concerning given the breadth and uncertainty of the offences to which s 16 applies. A conversion practice may consist of a single conversation or prayer. An offence involving a child does not require proof of injury, while the general offence may be established through recklessness as to an unspecified and comparatively low threshold of injury. Nor is the provision confined to the serious indictable offences in Divisions 1 and

2. On its face, it applies to any offence under the draft. An organisation could therefore be deemed to have committed an offence because of an isolated interaction by a volunteer or contractor, even though the organisation did not direct, approve or know about the conduct.

66. The drafting requires the accused person to **prove** that they **could not** have known of or prevented the offence despite taking **all** reasonable precautions and exercising **all** due diligence. These absolute expressions may make the defence difficult to establish, particularly after an incident has occurred and a prosecutor can identify additional training, supervision, reporting or monitoring measures that might theoretically have prevented it.

67. Section 16 also provides that the employer or principal may be prosecuted and convicted whether or not the employee or agent has been prosecuted or convicted. The organisation may therefore face criminal proceedings even though the person who allegedly engaged in the conduct has never had their criminal responsibility established in separate proceedings. This further distances organisational liability from actual authorisation, knowledge or wrongdoing by the organisation itself.

68. The provision applies to every offence under the draft rather than being confined to offences committed within the scope of employment or agency. Section 16 does not expressly require that the employee was acting in the course of their duties, with actual or apparent authority, for the organisation's benefit, or in accordance with an organisational policy or practice. On its face, an organisation may therefore be exposed to liability for conduct by an employee or volunteer that was personal, unauthorised and contrary to its express instructions.

69. The inclusion of volunteers is especially inappropriate. Volunteers may have limited training, irregular involvement and considerable independence from the organisation. A church may have hundreds of volunteers participating in youth activities, small groups, prayer ministries and informal pastoral support. It is unreasonable to deem the church guilty of the same criminal offence whenever any one of those volunteers engages in prohibited conduct unless the church can satisfy such a demanding reverse-onus defence.

70. Criminal responsibility should ordinarily reflect the culpability of the person or organisation being punished. An organisation should not be convicted of an indictable offence merely because it has some employment, contractual or volunteer relationship with the individual offender. Organisational criminal liability should require proof that a senior officer authorised or knowingly permitted the conduct, that the offence resulted from an established organisational policy or culture, or that the organisation culpably failed to take reasonable precautions against a clearly identified risk.

Civil Response scheme

71. Part 4 establishes a civil response scheme administered by the Anti-Discrimination Commissioner. The scheme is not confined to harmful, coercive or criminal conduct. It may be initiated in relation to any alleged conversion practice, including a single consensual conversation, prayer or act of religious guidance that causes no injury. The breadth of the definition is then compounded by the low threshold for regulatory intervention, the ability of third parties to make reports, the Commissioner's proactive and systemic investigatory powers, extensive compulsory information-gathering powers, and the potential for undertakings, compliance measures and published findings. The principal concerns are:

- the low threshold for civil intervention;
- who may make a report;
- reports that do not allege harm;
- Commissioner-initiated and systemic investigations;
- coercive information-gathering powers and privacy;
- compelled self-incrimination and interaction with criminal proceedings; and
- the Commissioner's powers over religious organisations, including undertakings, compliance measures, guidelines and publication.

Low threshold for civil intervention

72. The civil response scheme applies to any conduct falling within the broad definition of conversion practice, even where the requirements of a criminal offence under Part 2 are not established. It is therefore not confined to practices that cause injury, involve coercion or create a substantial risk of serious harm.

73. This is not merely an educational or advisory scheme. An allegation may trigger official investigation, compulsory information-gathering and formal regulatory action by the Anti-Discrimination Commissioner. Given the breadth of s 5, this may include a single conversation, prayer or act of religious guidance.

74. The scheme may therefore extend to conduct that was consensual, non-coercive and caused no injury or other adverse consequence. A religious, parental or spiritual interaction may be subjected to official scrutiny solely because of its alleged purpose.

75. This creates a significant structural problem. The draft permits regulatory intervention in relation to conduct that falls below the threshold for criminal prosecution and need not involve any demonstrated harm. The civil regime therefore risks becoming a mechanism for regulating disfavoured beliefs, advice and conversations rather than responding to proven injury or abuse.

Who may make a report

76. The threshold for initiating the civil response process is exceptionally low. Section 24 permits any person to make a report alleging that a conversion practice has occurred or is occurring. The person making the report need not be the person who was allegedly subjected to the practice, nor do they appear to require that person's authority or consent. The Commissioner's processes may therefore be initiated by a third party who was not present, has no direct knowledge of the events and has suffered no personal wrong.

77. This could include an advocacy organisation, activist, former member of a religious community, observer or other person relying upon second-hand information. Given the breadth of the definition of conversion practice, a third party might report a sermon, church policy, pastoral-care practice or account of a private conversation because they consider it inconsistent with their own understanding of acceptable religious conduct. The person allegedly subjected to the conduct may not regard themselves as harmed, may not wish to complain and may consider the interaction helpful or consistent with their own religious convictions. Nevertheless, the report may bring the minister, parent, church, school or religious organisation within an official regulatory process.

78. This is materially different from an ordinary civil complaint in which an affected person alleges that they have suffered a personal wrong and seeks a defined remedy. In such a process, the complainant's standing and personal interest provide an important connection between the alleged conduct and the exercise of regulatory or judicial power. The draft instead establishes a report-based scheme in which outsiders may initiate scrutiny of conduct involving other people. This shifts the civil regime away from resolving individual grievances and towards intrusive investigation of religious, pastoral and organisational practices.

79. The ability of uninvolved third parties to make reports creates a real risk of ideological or strategic use of the scheme. Churches, mosques, temples, synagogues, schools, and other religious organisations may be repeatedly reported by persons who object to their doctrines or practices, rather than by anyone claiming to have been personally harmed. Although the Commissioner may ultimately decline to respond to a report that is frivolous, vexatious, misconceived or unsupported, that discretion does not prevent the report from being made or guarantee that it will be rejected before the respondent is required to provide information, obtain legal advice or suffer reputational harm.

80. At a minimum, the civil response process should ordinarily be initiated only by the person allegedly subjected to the conduct or by a representative acting with that person's authority. Any exception should be confined to cases involving a child, a person lacking capacity, or credible evidence of serious and systemic harm. The Commissioner should not be given a general jurisdiction to investigate private religious or pastoral interactions at the request of persons with no direct involvement in them.

Investigatory powers of the Commission

81. The draft also permits the Commissioner to initiate investigations without a complaint from the person allegedly subjected to the conduct. This significantly expands the civil regime beyond the resolution of individual grievances. The Commissioner may investigate alleged patterns, systemic conduct or organisational practices even where no affected person seeks intervention, no injury has been established and the underlying allegation is disputed.

82. In the context of a religious organisation, a systemic investigation could extend well beyond the particular interaction that prompted concern. The Commissioner may seek to examine pastoral-care policies, training materials, sermons, theological statements, membership and leadership standards, internal correspondence and the way religious beliefs are applied in practice. A limited allegation concerning one conversation or prayer could therefore become the basis for wide-ranging scrutiny of the organisation's doctrine, governance and internal religious life.

83. This creates a substantial risk that the Commissioner will move from investigating identifiable harmful conduct to evaluating whether particular religious beliefs and pastoral practices are acceptable. The distinction is important. A regulator may properly investigate conduct that is coercive, abusive or harmful, but should not be empowered to determine whether a church's teachings about sexuality, gender, marriage or chastity are themselves legitimate, or whether ministers may encourage adherents to live consistently with those teachings.

84. The power to initiate systemic investigations should therefore be confined to circumstances involving credible evidence of serious and repeated harm. It should not permit broad examination of religious doctrine or organisational practice merely because a regulator considers that those beliefs may contribute to conduct falling within the draft's expansive definition of conversion practice.

Coercive information gathering and privacy

85. The Commissioner is given extensive coercive information-gathering powers. Under s 37, any person whom the Commissioner reasonably believes possesses information or documents that are relevant and necessary to an investigation may be required to provide that information or produce those documents. The Commissioner may take possession of documents, copy or extract material from them, and retain them for as long as is reasonably necessary. Section 38 separately permits the Commissioner to compel a person to attend and answer questions. Failure to comply without reasonable excuse is an offence carrying a substantial financial penalty.

86. These powers are not confined to the person accused of engaging in a conversion practice. They may be exercised against churches, mosques, temples, schools, family members, colleagues, counsellors and other third parties who are not alleged to have committed any wrongdoing. An investigation could therefore expose confidential pastoral records,

counselling notes, internal correspondence, training materials and sensitive communications involving children and families.

87. The position concerning privilege and confidentiality requires substantial clarification. The draft does not contain an express protection for confidential pastoral communications, nor does it expressly preserve legal professional privilege within the information-gathering provisions. Whatever protections may continue to apply under the general law, legislation conferring powers of this breadth should clearly state that legally privileged material cannot be compelled and should provide specific safeguards for highly sensitive pastoral and counselling records. Religious organisations should not be required to surrender confidential personal disclosures merely because the Commissioner considers them relevant to an investigation into a broadly defined conversion practice.

Compelled self-incrimination

88. Section 40 is more concerning still. It expressly provides that a person is not excused from answering questions or supplying information or documents because doing so may incriminate them or expose them to a penalty. Although s 40(2) appears at first to provide a use immunity, it expressly permits the compelled answer, information or document to be admitted in proceedings for an offence under the draft. The supposed protection therefore does not prevent material compelled during a civil investigation from being used against the individual in a prosecution for the very conversion-practice offences arising from the same conduct.

89. Nor does the draft provide an express derivative-use immunity preventing investigators or prosecutors from using compelled answers to locate other evidence. A person may therefore be forced to disclose the existence of witnesses, documents, communications or events that assist the subsequent criminal investigation. This creates a serious risk that the civil response scheme will operate as an evidence-gathering mechanism for indictable prosecutions, while denying the person the ordinary privilege against self-incrimination that would apply during a criminal investigation.

90. That is particularly unfair because the Commissioner’s investigation may concern precisely the same conduct that constitutes an alleged offence under ss 9 or 10. A minister, parent or pastoral carer could be compelled to attend, answer detailed questions and produce private records concerning an alleged conversation or prayer, with refusal itself attracting liability. The resulting material could then be available for use in criminal proceedings under the draft legislation. The distinction between a civil regulatory investigation and a criminal prosecution consequently becomes largely artificial.

91. Allegations capable of producing indictable criminal liability should be investigated through the ordinary criminal justice system, with its established safeguards concerning silence, self-incrimination, warrants, admissibility and prosecutorial responsibility. At a minimum, the draft should preserve legal professional privilege, provide appropriate protection for confidential pastoral and counselling communications, and grant complete direct and derivative-use immunity for all compelled material. Evidence obtained

compulsorily through the civil response scheme should not be admissible, directly or indirectly, in criminal proceedings.

Excessive power of the Commissioner over faith-based organisations

92. The overall model is substantially broader than a conventional discrimination complaints process focused upon an affected complainant, conciliation and remedies determined by a court or tribunal. The draft instead gives the Commissioner a proactive regulatory role extending well beyond the resolution of individual disputes.

93. The civil regime gives the Commissioner a range of mechanisms to influence future conduct, including informal resolution, agreements, undertakings and compliance measures. Although an undertaking is formally voluntary, the prospect of continued investigation, a compliance notice or publication may place considerable pressure upon an organisation to accept it.

94. The Commissioner's powers may lead to demands that churches, synagogues, mosques, schools and other religious organisations alter their policies, training, complaint procedures or religious-care practices. They may also affect how organisations communicate their beliefs, apply membership or leadership standards, and supervise religious leaders, staff and volunteers.

95. Such measures could extend far beyond the conduct that gave rise to the original report. A disputed conversation involving one person could result in broad preventive requirements governing an entire religious community. This may interfere directly with religious autonomy, governance and the internal ordering of religious organisations.

96. Binding restrictions upon religious teaching, counselling or spiritual care should not be imposed through an administrative process without a judicial finding that clearly defined unlawful conduct has occurred. This is especially important where the underlying definition may capture conduct that was isolated, consensual, non-coercive and harmless.

97. Although ss 41 and 42 provide some protection concerning identity and publication, the power to publish investigation outcomes or organisational reports may still create substantial reputational consequences. Publicly identifying an organisation or religious leader as having engaged in conversion practices could cause severe reputational damage before any court has determined that the conduct was unlawful.

98. That risk is intensified where conduct involving a child may also be described under the draft as child abuse. Such language carries an exceptional stigma and may affect employment, insurance, funding and community relationships even if the allegation is later rejected.

99. Strict confidentiality should therefore apply unless and until unlawful conduct has been established through a fair and independent process. Adverse findings should not be published without clear evidentiary standards, procedural fairness and appropriate judicial oversight.

100. The Commissioner's educational and guideline-making role may further expand the practical reach of the draft legislation. Although guidelines may not formally have the force of law, they may become de facto regulatory standards used in investigations, compliance assessments, decisions about whether an organisation exercised due diligence, and assessments as to whether an organisation or individual were "reckless" for the sake of the criminal provisions.

101. The Commissioner could thereby acquire substantial influence over what forms of prayer, religious instruction, counselling and spiritual care are regarded as acceptable. Guidelines should not be permitted to narrow statutory protections, create new obligations or determine contested questions of religious doctrine without parliamentary scrutiny.

102. That breadth of power is disproportionate where the conduct under investigation need not be repeated, coercive, abusive or harmful. The civil regime should be narrowed so that coercive remedies and public findings are confined to clearly established conduct involving actual harm or a substantial risk of serious harm.

Departure from the Tasmanian Law Reform Institute model

103. The draft departs substantially from the model recommended by the Tasmanian Law Reform Institute in its 2022 final report.

104. The TLRI approach focused attention upon practices presented as health care despite lacking reliable evidence of safety or efficacy. It responded particularly to providers making pseudo-scientific or purportedly clinical claims about their ability to alter a person's sexual orientation or gender identity. Treating such conduct as a purported health service provided a clearer connection between the conduct being regulated and the health-related harm said to justify government intervention.

105. By contrast, the proposed draft legislation abandons that limiting concept and instead adopts a much broader definition applying to any "practice or conduct". This substantially expands the scheme beyond purported treatment or clinical activity and allows it to reach informal religious, parental and personal interactions. At the same time, it removes an important source of definitional clarity by failing to distinguish providers offering purported treatment from parents, family members, faith leaders and others engaged in ordinary conversations or spiritual care.

106. Eight of the TLRI's sixteen recommendations concerned amendments to health legislation or action by public health authorities. The TLRI also envisaged an important role for the Chief Psychiatrist, particularly in relation to practices presented as therapeutic or clinical interventions. By contrast, the draft gives the Anti-Discrimination Commissioner the central regulatory role.

107. This draft legislation does not implement the TLRI's proposed amendments to the *Mental Health Act 2013*. Its consequential amendments to the *Health Complaints Act 1995* also move away from the TLRI's proposal to treat conversion practices as a form of "purported health service".

108. These are significant changes to the structure and rationale of the proposed scheme. Where the approach envisaged by the TLRI was directed principally towards purported health services and unsafe or unsupported therapeutic practices, the draft establishes a much broader regime capable of regulating ordinary religious, parental and personal interactions. These departures are not merely matters of drafting detail. Rather they make this draft legislation inconsistent with the conclusions and recommendations of the Tasmanian Law Reform Institute.

Religious Freedom and the Tasmanian Constitution

109. Tasmania is the only Australian State whose Constitution contains an express guarantee of religious freedom. Section 46(1) of the *Constitution Act 1934* provides:

> "Freedom of conscience and the free profession and practice of religion are, subject to public order and morality, guaranteed to every citizen." [1]

110. The draft places substantial burdens upon both freedom of conscience and the practice of religion. It may criminalise a single prayer, religious conversation or act of parental guidance, even where the conduct is consensual, non-coercive and causes no injury. It may also prevent a competent adult from obtaining religious assistance that they freely seek in order to live consistently with their own beliefs.

111. The burden is not confined to conduct that threatens public order or morality. The draft extends to private conversations and spiritual care that cause no demonstrated harm. It therefore appears to prohibit conduct falling within the very freedom that s 46 expressly guarantees, without limiting the prohibition to the qualifications identified in that section.

112. The draft may also interfere with institutional religious practice. Its civil and criminal provisions may affect religious teaching, prayer, spiritual care, membership standards, leadership requirements and the ability of religious communities to apply their beliefs in individual circumstances. Organisational liability and the Commissioner's regulatory powers may further pressure churches, mosques, temples, synagogues and other religious organisations to alter their internal practices.

113. There is consequently a serious question whether the draft is consistent with s 46 of the Tasmanian Constitution. At a minimum, Parliament should not enact legislation substantially restricting the free profession and practice of religion without directly addressing the constitutional guarantee and explaining why the restrictions fall within its qualifications concerning public order and morality.

Religious Freedom as a human right

114. Freedom of religion is a foundational internationally recognised human right which is recognised in Australian domestic law.

[1] *Constitution Act 1934 (Tas)*

115. Australian Courts have recognised “the importance of the freedom of people to adhere to the religion of their choice and the beliefs of their choice and to manifest their religion or beliefs in worship, observance, practice and teaching.”[2] The inclusion of a religious freedom provision in the *Australian Constitution* itself demonstrates that this freedom was considered one of particular moment in Australia at Federation.

116. Australia is party to a number of international agreements which recognise the right to freedom of religion. Article 18 of the *International Covenant on Civil and Political Rights* (ICCPR), which Australia has been a party to since 1980, stipulates that everyone shall have the right to freedom of religion, including the freedom to manifest one's religion or belief in worship, observance, practice, and teaching. Article 18(2) also prohibits the use of coercion “which would impair [a person’s] freedom to have or to adopt a religion or belief of [that person's] choice.”

117. In General Comment No. 22, the United Nations Human Rights Committee clarified that freedom of religion encompasses not only internal belief (forum internum) but also external manifestations (forum externum), including teaching, practice, and observance. Any restrictions on the manifestation of religion must be demonstrably necessary and proportionate under Article 18(3) of the ICCPR.

118. Most notably, the right to freedom of thought, conscience, and religion in Article 18 is one of the few rights that are *non-derogable* under the ICCPR (Article 4.2). This means that it cannot be suspended or restricted even in times of public emergency that threaten the life of the nation—a status shared with only a handful of rights such as the right to life, freedom from torture, and recognition as a person before the law.

119. The non-derogability of Article 18 reflects the United Nations Human Rights Committee’s recognition that religious freedom is fundamental to human dignity.[3]

Religious Freedom as a Corporate Right

120. Religious freedom is not merely an individual right. International human rights law expressly recognises that religion is exercised both individually and “in community with others”. That language is critical. It reflects the obvious reality that religion is not only held privately in the mind or expressed occasionally by isolated individuals. It is lived, taught, practised, handed on, and organised through families, congregations, schools, charities, denominations, and other religious bodies.

121. UNHRC General Comment 22 elaborates on the scope of Article 18 and recognises that freedom of thought and belief is *manifested individually and in community with others:*

> The right to freedom of thought, conscience and religion (which includes the freedom to hold beliefs) in article 18.1 is far-reaching and profound; it encompasses freedom of thought on all matters, personal conviction and the commitment to religion or belief,

[2] *Evans v New South Wales* 168 FCR 576 [2008], 580
[3] *General Comment No. 22*

whether manifested individually or in community with others.[4]

122. Article 6 of the *Declaration on the Elimination of All Forms of Intolerance and of Discrimination Based on Religion or Belief* recognizes that the manifestation of religion or belief is not confined to private individual belief or worship. It includes activities that are necessarily communal and institutional in character, including the establishment and maintenance of charitable or humanitarian institutions, the maintenance of places of worship, the observance of ceremonies and holidays, the appointment of religious leaders, the teaching and dissemination of religious materials, and the solicitation of voluntary contributions.

123. In the Sister Immaculate Joseph case, the UNHRC concluded:

> As to the claim under article 18, the Committee observes that, for numerous religions, including according to the authors, their own, it is a central tenet to spread knowledge, to propagate their beliefs to others and to provide assistance to others. These aspects are part of an individual's manifestation of religion and free expression, and are thus protected by article 18, paragraph 1, to the extent not appropriately restricted by measures consistent with paragraph 3…"[5]

124. This is also recognised in Australian legal precedent. The High Court has consistently held that s116 of the Constitution extends to protecting both religious groups and religious individuals.[6]

125. A proper protection of religious freedom must therefore protect the corporate and communal life of religious communities. Churches and other faith-based institutions must be free to gather for worship, teach their beliefs, appoint leaders, form communities of membership, maintain religious standards, operate ministries, employ staff who support their religious mission, and organise their internal affairs consistently with their faith. Without those protections, the right to religious freedom is reduced to a private liberty of individual belief, rather than a freedom to manifest religion in the public, communal, and institutional forms contemplated by the ICCPR.

126. This is particularly important because many religious obligations cannot be meaningfully fulfilled alone. The freedom to teach children, conduct worship, proclaim doctrine, provide religious education, care for the vulnerable, and operate ministries of mercy necessarily requires institutions. A church, religious school, charity, or faith-based organisation is not merely a secular body with religious individuals inside it. In many cases, the institution itself exists for a religious purpose and is one of the principal means by which believers exercise their religion in community with others.

---

[4] Human Rights Committee, General Comment No. 22 (48) (art. 18), 48th sess, UN Doc CCPR/C/21/Rev.1/Add.4 (27 September 1993), [1] ('Human Rights Committee, General comment No. 22 (48) (art. 18),'). Available at: https://www.refworld.org/legal/general/hrc/1993/13375

[5] *Sister Immaculate Joseph and 80 Teaching Sisters of the Holy Cross of the Third Order of Saint Francis in Menzingen of Sri Lanka v Sri Lanka*, Communication No 1249/2004, UN Doc CCPR/C/85/D/1249/2004 (2005), [7.2].

[6] Nicholas Aroney , ' Freedom of Religion as an Associational Right ' (2014) 33 University of Queensland Law Journal 153; Alex Deagon, *A Principled Framework for the Autonomy of Religious Communities: Reconciling Freedom and Discrimination* (Hart Publishing, Oxford, 2023) 44-46.

The rights of parents

127. Article 18(4) of the ICCPR provides that States Parties must respect "the liberty of parents and, where applicable, legal guardians to ensure the religious and moral education of their children in conformity with their own convictions."

128. This protection recognises that parents have a primary role in passing their religious and moral beliefs to their children. It is not confined to selecting a school or arranging formal religious instruction. It includes teaching children what the family believes, explaining how those beliefs apply to life, encouraging children to act consistently with them, and providing guidance about morality, relationships, sexuality and religious observance.

129. The right would have little substance if parents were permitted only to state their beliefs in the abstract, but prohibited from explaining, applying or recommending those beliefs to their children. The liberty protected by Article 18(4) necessarily includes the ability of parents to provide age-appropriate religious and moral guidance in the family home.

130. The right of parents is reinforced by Article 13(3) of the International Covenant on Economic, Social and Cultural Rights. It requires States Parties to respect the liberty of parents:

> "to choose for their children schools, other than those established by the public authorities, which conform to such minimum educational standards as may be laid down or approved by the State and to ensure the religious and moral education of their children in conformity with their own convictions."

131. Parents therefore have a recognised right not only to provide religious and moral education personally, but also to choose religious schools through which that education may be provided. The protection extends to the existence and operation of non-government schools that teach and organise their communities in accordance with a religious ethos, subject to appropriate minimum educational standards.

132. The right to choose a religious school would be hollow if the school were unable to teach its religious beliefs, form a community around those beliefs, or provide moral guidance consistent with its religious character. Religious schooling necessarily involves more than the inclusion of religious studies within an otherwise secular institution. It may include worship, religious instruction, behavioural expectations, the selection of suitable leaders and staff, and the application of religious principles across school life.

Limiting religious freedom

133. Any regulation of religious practices must satisfy the test under Article 18(3), namely that limitations are necessary to protect public safety, order, health, or morals or the fundamental rights and freedoms of others and that they are legislated.

134. *The Siracusa Principles on the Limitation and Derogation Provisions in the ICCPR (1984)* explain that limitations on rights need to be necessary, proportionate to the aim, and the least intrusive means available(s10-11, 23-31). These criteria require more than fear that religious activity *might* cause harm. They require clear evidence that the specific religious

activity poses a specific, concrete risk to public health, safety, or the rights of others. They also require that any limitations on religious freedom are the least intrusive possible to address the specific, concrete risk.

135. In balancing competing rights, the *Siracusa Principles* give priority to the most fundamental rights – including religious freedom – stating:

> When a conflict exists between a right protected in the Covenant and one which is not, recognition and consideration should be given to the fact that the Covenant seeks to protect the most fundamental rights and freedoms. In this context especial weight should be afforded to rights not subject to limitations in the Covenant. (s37)

136. The *Siracusa Principles* also require that any limitation of rights is non-discriminatory and does not target particular groups (including religious groups) disproportionately (ss8-9).

137. International jurisprudence has also consistently affirmed the primacy of the right to freedom of religion or belief, even if the beliefs are controversial or unpopular within the community.

138. The European Court of Human Rights (ECtHR) in *Kokkinakis v. Greece* (1993) held that proselytism, even if persistent, is protected under Article 9 of the European Convention on Human Rights (ECHR), unless it involves improper pressure or coercion. The Court warned against criminalising religious outreach merely because it is persuasive or doctrinally exclusive.

139. In *Church of Scientology Moscow v. Russia* (2007), the ECtHR criticised the Russian government's attempts to de-register a religious group based on controversial public perceptions, reiterating that freedom of association (Article 11) and religion (Article 9) cannot be denied due to societal disapproval or unfamiliarity with a group’s beliefs or structure.

140. These cases establish that governments must not act on vague or subjective notions of “harm” or “public discomfort” to suppress religious expression. Instead, states are obligated to demonstrate with evidence that specific conduct, not beliefs or religious identity, presents a genuine, pressing threat to public order or the rights of others

Conclusion

141. These problems are not peripheral matters that can be resolved through minor amendment. They arise from the fundamental scope, structure and enforcement model of the draft. The legislation in its current form should therefore be withdrawn.

142. Any future proposal should be substantially redrafted and subject to further public consultation, with a clear focus on harmful and coercive conduct and effective protection for legitimate parental, religious and professional activity.

Rt Rev Richard Condie
Bishop
Anglican Diocese of Tasmania

Imam Shadi Alsuleiman
President
Australian National Imams Council

Matt Garvin
Mission Director
Tasmanian Baptists

Dr Ali Alsamail
Director
Shia Muslim Council of Australia

Very Rev Fr Joshua Tadros
Papal Legate
Coptic Orthodox Church

Ps Mark Edwards
National Religious Freedom Representative
Australian Christian Churches

Kojo Akomeah
Director of Public Affairs and Religious Liberty
Seventh Day Adventist Church, Australia

Rt Rev Mark Powell
Moderator
Presbyterian Church of Tasmania

Steve Mazey
National Leader
Acts Global Churches

Major Dean Clarke
Divisional Commander
The Salvation Army, Tasmania

Bruce Bennett
National Director
Fellowship of Independent Evangelical Churches

Gary Hourigan
National Director
International Network of Churches

Ps Justine Simms
National Leader
Full Gospel Australia

Kent Medwin
Head of Strategy
Hillsong Church

John Metcalfe
Chair
Australian Association of Christian Schools

Mike Southon
Executive Director
Freedom for Faith