



9 July 2026

Dr Rosalie Woodruff MP
Leader of the Tasmanian Greens
Parliament House
HOBART TAS 7000

By email: [REDACTED]

Dear Dr Woodruff

Submission to the Consultation on the Conversion Practices Prohibition Bill 2026

Thank you for the opportunity to comment on the draft Bill.

As you are aware, I hold a number of different jurisdictional roles, one of which is the Health Complaints Commissioner. It is in that capacity I offer some reflections on the Bill.

General Comments

- The criminal and civil penalties appear to be proportionate and explicit.
- The provisions in relation to the Commissioner appear to be adequate and transparent. I support the Anti-discrimination Commissioner fulfilling these functions.
- The alternative dispute resolution and investigation procedures appear to be adequate.
- For reasons which are outlined below, nominating the Health Complaints Commissioner as a body with which the Commissioner may consult in cl 58(2) may be beneficial.

Intersection with the Code of Conduct for Unregistered Health Care Workers (the Code).

As you will be aware, the Code came into effect on 24 June 2026 and represents a minimum set of standards health care workers are expected to meet in order to operate ethically and safely. Breaches of the Code may result in the application of interim (for 12 weeks renewable) or permanent prohibition orders. These orders can be applied to the entirety of a worker's practise or parts of it, depending on the nature of the breach.

The scope of the Code includes the provision of counselling or mental health support by unregistered providers. Conceivably, this intersects with the intent of the Bill and would require the Anti-discrimination Commissioner to assess whether the matter falls within their jurisdiction or mine as Health Complaints Commissioner. This may be particularly so if the threshold for the Commissioner to deal with the matter under this legislation is uncertain. Having an explicit pathway to consult on such matters would facilitate the expeditious management of the matter and facilitate that consultation.

Overall, I support the intent of the Bill.

Thank you for the opportunity to comment on this important piece of legislation. Should you have any queries in relation to this submission, please do not hesitate to contact me on 0438 424 169 or via email at grant.davies@ombudsman.tas.gov.au.

Yours sincerely



Dr Grant Davies
Ombudsman and Health Complaints Commissioner