



17 November 2025

Ms Anna Brown
Chairperson

Variations in Sex Characteristics (Restricted Medical Treatment) Assessment Board

Via email to: VSCBoard@act.gov.au

Dear Ms Brown,

Thank you for providing me with notice of the public consultation period for the General Treatment Plan submitted to the Variation in Sex Characteristics (Restricted Medical Treatment) Assessment Board (the VSC Board) regarding Testosterone Replacement.

Following review of the documentation, I am pleased to note that all patients and families would be offered a referral to the Variation in Sex Characteristics Psychological Service to provide support related to their diagnosis. I also acknowledge the references to additional services, including lived experience supports as important avenues to assist individuals and families through these processes.

The application notes that diagnoses may be made throughout childhood, with Testosterone Deficiency arising for various reasons usually in early childhood. Having reviewed the application, it is not clear whether there might be circumstances when it would *not* be appropriate or optimal to initiate treatment of testosterone to replicate 'mini-puberty' following a diagnosis of Testosterone Deficiency. I recommend that any approval of the General Treatment Plan includes clarification, if appropriate, of any optimal timeframes for commencing Testosterone Replacement to simulate 'mini-puberty'.

This application appears to proactively consider the needs of the cohort of patients affected by testosterone deficiency in infancy, including the potential need for ongoing psychological supports throughout childhood. The support provided to parents and legal guardians is also considered, given their role regarding decision-making for timely treatment to mitigate against negative impacts of prolonged testosterone deficiency in infancy related to the absence of 'mini-puberty'.

I recognise the effort taken by the applicant in liaising with the VSC Board to develop a robust application for public consultation and wish the Assessment Committee well in its deliberations.

Warm regards,

Jodie Griffiths-Cook
Public Advocate
ACT Human Rights Commission