



3 February 2022

RCGP response to Government Equalities Office consultation on banning conversion therapy

Do you agree or disagree that the Government should intervene to end conversion therapy in principle?

- Strongly agree
- Somewhat agree
- Neither agree or disagree
- Somewhat disagree
- Strongly disagree
- Prefer not to say

Why do you think this?

The Royal College of General Practitioners (RCGP) is a member of the Coalition Against Conversion Therapy and a signatory of the Memorandum of Understanding (MoU) on Conversion Therapy in the UKⁱ. The MoU is signed by 21 health and psychological organisations and its primary purpose is the protection of the public through a commitment to ending the practice of 'conversion therapy' in the UK.

There exists no evidence that conversion therapy is therapeutic or effective, whether in relation to sexual orientation or gender identity, and neither sexual orientation nor gender identity are in themselves indicators of a mental disorder. Instead, the practice of conversion therapy is unethical and potentially harmful especially with regards to mental health outcomes. As such, the RCGP supports government intervention to end these practices.

We believe that this intervention should take the form of a ban on conversion therapy as proposed but that this must also be accompanied by additional actions to end the practice of conversion therapy. As outlined in the MoU, these include ensuring:

- the public are well informed about the risks of conversion therapy.
- healthcare professionals and psychological therapists are aware of the ethical issues relating to conversion therapy,
- evidence into conversion therapy is kept under regular review, and

- professionals from across the health, care and psychological professions are supported to work together to achieve the above goals.

To what extent do you support, or not support, the Government’s proposal for addressing physical acts of conversion therapy?

- Strongly agree
- Somewhat agree
- Neither agree or disagree
- Somewhat disagree
- Strongly disagree
- Prefer not to say

Why do you think this?

As noted in the consultation documents, physical violence is already unlawful whether committed as part of conversion therapy or not. However, recognition that conversion therapy may include physical acts of violence is important in ensuring the public, healthcare professionals and psychological therapists are well informed about the risks and ethical issues relating to conversion therapy.

The RCGP specifically supports the proposals to consider conversion therapy an aggravating factor in cases of physical violence in order to ensure acknowledgement of the additional harm and trauma that may arise as a result of physical acts of conversion therapy.

The Government considers that delivering talking therapy with the intention of changing a person’s sexual orientation or changing them from being transgender or to being transgender either to someone who is under 18, or to someone who is 18 or over and who has not consented or lacks the capacity to do so should be considered a criminal offence. The consultation document describes proposals to introduce new criminal law that will capture this. How far do you agree or disagree with this?

- Strongly agree
- Somewhat agree
- Neither agree or disagree
- Somewhat disagree
- Strongly disagree
- Prefer not to say

How far do you agree or disagree with the penalties being proposed?

- Strongly agree
- Somewhat agree
- Neither agree or disagree
- Somewhat disagree
- Strongly disagree
- Prefer not to say

Do you think these proposals miss anything?

- Yes
- No
- Don't know

If yes, can you tell us what you think we have missed?

Therapeutic approaches

We support the view that any therapeutic approach which begins with an assumption that any sexual orientation or gender identity is inherently preferable, or which attempts to bring about a change of sexual orientation or gender identity, can never be considered legitimate.

However, we also welcome the recognition within these proposals that a ban on conversion therapy must not limit or interfere with legitimate talking therapies or other support for those who may be questioning if they are LGBT.

This position is made clear in the MoU on conversion therapy in the UKⁱⁱ which states:

“This position is not intended to deny, discourage or exclude those with uncertain feelings around sexuality or gender identity from seeking qualified and appropriate help. This document supports therapists to provide appropriately informed and ethical practice when working with a client who wishes to explore, experiences conflict with or is in distress regarding, their sexual orientation or gender identity. Nor is it intended to stop psychological and medical professionals who work with trans and gender questioning clients from performing a clinical assessment of suitability prior to medical intervention. Nor is it intended to stop medical professionals from prescribing hormone treatments and other medications to trans patients and people experiencing gender dysphoria. For people who are unhappy about their sexual orientation or their gender identity, there may be grounds for exploring therapeutic options to help them live more comfortably with it, reduce their distress and reach a greater degree of self-acceptance. Some people may benefit from the support of psychotherapy and counselling to help them manage unhappiness and to clarify their sense of themselves. Clients make healthy choices when they understand themselves better.”

In addition to what is already set out in the proposals with regard to avoiding interference in the legitimate work of clinicians and healthcare staff, the RCGP would encourage the government to make it clear that a ban on conversion therapy would not seek to interfere with the ability of those with uncertain feelings around sexuality or gender identity to seek appropriate, qualified help.

Furthermore, we would welcome clarity that a ban would not intend to prevent appropriate professionals performing a clinical assessment of suitability prior to medical intervention or prevent medical professionals from prescribing hormone treatments where required.

Consent

We welcome the assertion that those under 18 cannot consent to conversion therapy, however, it is not clear to the RCGP that it is possible for an adult to properly consent either. Any consent may be limited or rendered meaningless by the likely power imbalances in information asymmetries at play. We would encourage the government to carefully consider

whether such consent is possible and if so, what safeguards are required to ensure consent is fully informed and meaningful.

Please note that we have not responded to further questions in the consultation as these are outside the remit and expertise of the RCGP.

ⁱ [Memorandum of Understanding \(MoU\) on Conversion Therapy in the UK](#)

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