



Coalition Against Conversion Therapy
Promoting parity of esteem across
sexuality and gender

Independent Chair
Dr Igi Moon CPsychol AFBPsS

Deputy Chair
Jeremy Clarke CBE FBACP

Secretariat
Neil Baker
neil.baker@bps.org.uk

KEY MESSAGES

1. Supporting a ban on conversion therapy

Any attempt to eradicate the practice of conversion therapy in the UK or internationally must be welcomed and we support the Government's commitments to act to ban conversion therapy, which are backed up by the evidence from its own research.

2. Getting the definition right is the key to an effective and workable ban

A poorly worded definition of conversion therapy in the legislation will fail properly to protect everyone who is at risk of conversion therapy, and could ALSO have unintended consequences on the delivery of ethical therapeutic practices for people who wish to explore issues of sexuality and gender with trained, professional therapists. The Government should adopt the MoU definition of conversion therapy.

The MoU defines conversion therapy as: *"an umbrella term for a therapeutic approach, or any model or individual viewpoint that demonstrates an assumption that any sexual orientation or gender identity is inherently preferable to any other, and which attempts to bring about a change of sexual orientation or gender identity or seeks to suppress an individual's expression of sexual orientation or gender identity on that basis"*.

3. Protecting everyone at risk of conversion therapy

Signatories and supporters of the MoU agree that the practice of conversion therapy, whether in relation to sexual orientation or gender identity, is unethical and potentially harmful, however it is offered. The proposals within the consultation fall short of protecting everyone at risk of conversion therapy, primarily because the government's own research showed that adult victims can be manipulated into giving consent too. To be fully protective, the proposals must be changed to:

- Provide a full ban on conversion therapy for all adults as well as under-18s
- Clearly include bisexual, asexual, intersex and non-binary people within the proposals
- In line with the MoU definition of conversion therapy, the ban must include attempts to suppress as well as change a person's sexual orientation or gender identity

4. Why it's not possible to give informed consent to conversion therapy

The current proposals allow for conversion therapy to be permitted where an adult gives informed consent. We believe informed consent is not possible when it comes to the practice of conversion therapy for the following reasons:

- Conversion therapy is unethical, potentially harmful and not supported by evidence. This lack of evidence of benefit, and given that all psychological therapy professional bodies consider the practice is unethical, makes it impossible for a practitioner to offer and establish informed consent in any way that would be safe or effective. The government's own evidence identified adults caught up in conversion therapy, who had lacked capacity to consent.



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- Conversion therapy is widely considered to be a violation of article 3 of the European Convention on Human Rights and therefore incompatible with the duty of Government to provide protection to individuals from serious harm amounting to torture, or inhuman or degrading treatment. This protection must apply to all people in the UK.
- Conversion therapy represents an unacceptable risk of serious harm to anyone who is struggling with their sexuality or gender, and who is especially vulnerable at the point of seeking help. Irrespective of their age, therefore, the duty of care that falls to talking therapists prevents them from offering conversion therapy, knowing that someone seeking help in this position is open to being exploited and manipulated against their best interests.

5. Supporting victims and survivors and those at risk of conversion therapy

The implementation of a ban offers an important opportunity to establish statutory support for victims and survivors and those at risk of conversion therapy, and we believe the legislation should make provision for:

- Nationally funded programmes across the devolved administrations, led within mental health, that aim to eliminate harm and eradicate conversion therapy across the whole UK, are informed by research into the effectiveness of locally delivered services, and overseen by expert reference groups, drawing on the expertise within the MOU Coalition, as well as on lived experience of survivors and victims.

To include:

- Ongoing fully funded support services for victims and survivors and those at risk, provided by the Government, which include access to psychological support. These services should report on outcomes for their users, and evaluate their impact on reducing harm from conversion therapy.
- Funding for further research into the local prevalence and harm from conversion therapy for people of all age ranges, and across communities of different faiths and ethnic backgrounds, in particular, where the government's published research has suggested greater levels of risk.
- Public awareness and education campaigns about conversion therapy, and training across agencies such as regulatory authorities, mental health and psychological therapy professions, whenever working with issues of sexuality and gender, in order to create a safer climate, and better knowledge and understanding to prevent future harm.

IMPORTANT MESSAGE: IF YOU INTEND TO RESPOND TO THE CONSULTATION THE DEADLINE IS FRIDAY DECEMBER 10TH – YOU CAN ACCESS THE ONLINE CONSULTATION HERE:

<https://equalityhub.citizenspace.com/government-equalities-office/banning-conversion-therapy/>

BY ALL MEANS USE OUR KEY MESSAGES ABOVE, AND ANSWERS BELOW, TO INFORM YOUR OWN RESPONSE, HOWEVER DO REMEMBER TO ADD YOUR OWN VIEWPOINT AND EMPHASIS, SO THAT YOUR RESPONSE WILL BE COUNTED SEPARATELY

How did we respond to the required questions?

Views on banning conversion therapy

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

Strongly agree



Targeting physical conversion therapy

Question 1) To what extent do you support, or not support, the Government's proposal for addressing physical acts of conversion therapy? **Strongly support**

Targeting talking conversion therapy

Question 2) 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? **Somewhat agree**

Question 3) How far do you agree or disagree with the penalties being proposed? **Somewhat disagree**

Question 4) Do you think that these proposals miss anything? **Yes**

Restricting the promotion of conversion therapy

Question 5) The Government considers that Ofcom's Broadcasting Code already provides measures against the broadcast and promotion of conversion therapy. How far do you agree or disagree with this? **Neither agree or disagree**

Question 6) Do you know of any examples of broadcasting that you consider to be endorsing or promoting conversion therapy? **Yes**

Question 7) The Government considers that the existing codes set out by the Advertising Standards Authority and the Committee of Advertising Practice already prohibits the advertisement of conversion therapy. How far do you agree or disagree with this? **Neither agree or disagree**

Question 8) Do you know of any examples of advertisements that you consider to be endorsing or promoting conversion therapy? **No**

Protecting people from conversion therapy overseas

Question 9) The consultation document describes proposals to introduce conversion therapy protection orders to tackle a gap in provision for victims of the practice. To what extent do you agree or disagree that there is a gap in the provision for victims of conversion therapy? **Strongly agree**

Question 10) To what extent do you agree or disagree with our proposals for addressing this gap we have identified? **Somewhat disagree**

Ensuring charities do not support conversion therapy

Question 11) Charity trustees are the people who are responsible for governing a charity and directing how it is managed and run. The consultation document describes proposals whereby anyone found guilty of carrying out conversion therapy will have the case against them for being disqualified from serving as a trustee at any charity strengthened. To what extent do you agree or disagree with this approach? **Strongly agree.**

Recognition by authorities of conversion therapy as a problem

Question 12) To what extent do you agree or disagree that the following organisations are providing adequate action against people who might already be carrying out conversion therapy? Police; Crown Prosecution Service; OTHER statutory service. **Somewhat disagree**

Question 13) To what extent do you agree or disagree that the following organisations are providing adequate support for victims of conversion therapy? Police; Crown Prosecution Service; OTHER statutory service. **Somewhat disagree**

Question 14) Do you think that these services can do more to support victims of conversion therapy? **Yes**