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Dear Counsel General and Minister for Health,

Re: Gender Identity Services in Wales

We are writing to you together as we believe this matter is important for both your portfolios, with profound implications for young people, lesbians and gay men, and good governance in Wales.

You may be aware that the international law firm Pogust Godhead has today announced that it is pursuing a group litigation order against the Tavistock and Portman Clinic. It is not yet clear how many families or individuals will take part in the action, or whether any are Welsh. The announcement does demonstrate, however, the conviction that there are major concerns about the legality of services for young people presenting with gender dysphoria as practiced at that clinic.

This action follows the recent announcement that the clinic will be closing due to its unsafe practices. We urge you to note that this is the clear finding of the Interim Cass Review, which states

A fundamentally different service model is needed which is more in line with other paediatric provision, to provide timely and appropriate care for children and young people needing support around their gender identity. This must include support for any other clinical presentations that they may have.

Although some activists have sought to argue the closure is to enable expansion of the services, it is obvious that NHS England and Dr Cass, along with many other clinicians, regard the entire model as unsafe.

This legal action follows the Keira Bell Judicial Review, which found a deeply worrying lack of research evidence underpinning the clinical model involved, in which a high proportion of young people are offered puberty blockers, and 98% of those go on to take wrong-sex hormones, both of which have long term, woefully under-studied physical and mental impacts.

We have written to Welsh Government expressing our concerns about the 'affirmation model' promoted by Tavistock, the Gender Identity Service in Wales and activist groups close to policy development. For example, we wrote specific letters to the then Minister for Health and Counsel General on 6 November 2020 and again (cc Counsel General) on 1 December 2020, and we provided a full response on the Action Plan last year. Despite our frequent attempts to meet and be engaged in consultation, we have been rebuffed.

Welsh Government cannot say it has not been warned of the concerns many people in Wales have about your approach.

We have pointed out that:

- Clinicians have reported that in some cases, parents would clearly prefer a trans child to a lesbian or gay one. In such situations, progressing to social, hormonal or surgical transition is obviously 'transing away the gay' – a form of conversion therapy;
- The growing number of detransitioners who are lesbian, gay or bisexual reporting that appropriate support for other challenges (trauma, autism etc) would have enabled them to avoid deeply harmful medical interventions;
- The profound homophobia implicit both in the promotion of gender stereotypes and the dismissal of any lesbians, gay men or bisexuals who challenge the current orthodoxy.

It is essential that rather than rushing to 'affirm' the alleged dysphoria, clinicians are required to properly examine the individual, and have the resources to do so. In our response to the LGBTQ+ Action Plan, we urged Welsh Government to improve the funding for CAMHS, for this very reason.

We urge you, and through you the whole of Welsh Government, to undertake a thorough and transparent consideration of Welsh Gender Identity Services in the light of the closure of the Tavistock and today's announcement. In doing so we very much hope you will properly evaluate:

- global, growing clinical concerns about the affirmation model;
- the legality of decisions to persist with such a clinical approach given the major risks both of medical harm and legal challenge to such decisions;
- the need to consult widely, including with groups such as ours who are seeing the wrong being done in the name of misplaced 'kindness', which is directly hurting the young people of our communities.

We remain committed to dialogue with Welsh Government on this and other matters affecting lesbians, gay men and bisexuals in Wales. We very much hope to hear from you and gain the opportunity for a discussion.

Yours sincerely,

Lesbian, Gay & Bisexual Alliance Cymru