

# General Pharmaceutical Council response to the UK Equalities Office consultation on banning conversion therapy

**21 January 2022**

Conversion Therapy Consultation Team  
Government Equalities Office

By email: [ctconsultation@cabinetoffice.gov.uk](mailto:ctconsultation@cabinetoffice.gov.uk)

## General Pharmaceutical Council response to the UK Equalities Office consultation on banning conversion therapy

The General Pharmaceutical Council (GPhC) is the independent regulator for pharmacists, pharmacy technicians and pharmacies in Great Britain. Our main role is to protect, promote and maintain the health, safety and wellbeing of members of the public by upholding standards and public trust in pharmacy.

We have a number of ways in which we do this including:

- setting standards for pharmacy professionals and pharmacies to enter and remain on our register
- seeking assurance that pharmacy professionals and pharmacies continue to meet our standards, including by inspecting pharmacies
- acting to protect the public and to uphold public confidence in pharmacy if there are concerns about a pharmacy professional or pharmacy on our register
- promoting professionalism, supporting continuous improvement and assuring the quality and safety of pharmacy.

In our recently launched '*Delivering equality, improving diversity and fostering inclusion: Our strategy for change 2021-2006*', we have committed to using all of our regulatory influence and levers to tackle discrimination and make sure everyone can access person-centred care, fostering equality of health outcomes.

In line with this approach, we welcome and strongly support the Government's commitment to introduce a legislative ban on the coercive and abhorrent practice of conversion therapy in England and Wales.

We note that the proposals include introducing a new criminal offence alongside sentence uplifts for existing offences; a package of support for victims; introducing Conversion Therapy Protection Orders to protect potential victims from undergoing the practice; and exploring further measures to prevent the promotion and advertisement of conversion therapy.

Whilst we do not have the expertise to comment on all of these aspects in detail, we have focused our responses to those areas that fall within the scope of our regulatory role and remit.

We support the Government's assessment that *"no form of conversion therapy is consistent with the existing regulatory standards of statutory healthcare professionals"* and confirm that this is the case for pharmacists and pharmacy technicians.

We do not have evidence to suggest that pharmacists, pharmacy technicians, or registered pharmacy premises, are involved in providing so-called conversion therapy. However, we would take very seriously any allegation about anyone on our register, or any registered premises, involved in providing so-called conversion therapy as this is inconsistent with our professional standards.

## Outstanding questions and concerns

We welcome the Government's positioning and confirmation that the ban will complement the existing clinical regulatory framework and that clinical practitioners, working in line with their professional obligations and within existing regulatory frameworks, will not be affected by the legislation. This is important to ensure that patients receive legitimate, ethical and evidence-based care, counselling or support if they need to discuss their sexual orientation or gender identity, without judgement.

However, we have a number of questions and concerns about the proposals as they relate to consent, specifically the suggestion that the legislation will allow 'talking conversion therapy' to take place in instances where adults have 'freely consented'.

The consultation makes it clear that *"there is no justification for these coercive and abhorrent practices and the evidence is clear that it does not work: it does not change a person from being LGBT and can cause long lasting damage to those who go through it. We are committed to building a society in which conversion therapy no longer takes place"*.

On that basis, we question whether a person can freely consent to a 'treatment' that is acknowledged to be abhorrent and coercive. Even if it were possible for a patient to 'freely consent', this would conflict with the Government's own assessment that no form of conversion therapy is consistent with the existing regulatory standards of statutory healthcare professionals. Therefore, it follows that it would be unethical for conversion therapy to be provided by healthcare professionals.

## Next steps

We are very happy to discuss this important consultation further and work with you going forward, where possible.

We are keen to learn more about the outcomes of the consultation to improve the safety of patients and ensure that pharmacy plays its part in assuring that harmful conversion therapies of all sorts are stopped.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Damon Bull". The signature is written in a cursive style with a small dot above the 'i' in "Bull".

Chief Executive & Registrar