

## **Re: Consultation response to LGBTQ+ Action Plan**

Platform is the charity for mental health and social change.

We are a platform for connection, transformation and social change. We're driven by the belief that a strengths-based approach is the foundation to sustainable wellbeing for everyone. We do not believe that people or communities are "broken" or in need of fixing.

Our work takes a trauma informed approach to understanding mental health and emotional distress, and we see the current mental health, and wider health, social care and public sector systems as no longer fit for purpose. Based on illness and deficit models, they deny people the hope and agency to heal.

### **Overall approach**

Platform supports the aims and approach of the Action Plan, but believes a number of sections could be strengthened. The plan recognises that LGBTQ+ people are more likely to experience poorer mental health. Platform would emphasise that experiencing prejudice and discrimination is a form of trauma, and that this is a form of collective trauma. Thus, we would emphasise the need for all services to be trauma informed, aware of the damage that discrimination can inflict, and not seek to medicalise the responses to this trauma. LGBTQ+ people experience poorer mental health because of prejudice and discrimination, not because there is anything 'wrong' with them.

We are particularly supportive of the proposal to ban conversion therapy. Nobody should be told that their sexuality or gender identity should be something to be 'cured', yet we are still aware of this practice occurring, with predictable effects on Mental Health. As an interim step prior to legislation, we call on the Welsh Government to ensure that Health and Care leaders send a message to psychiatrists, counsellors, and other Health and Care professionals – whether in the NHS or private - that trying to 'cure' LGBTQ+ people is harmful and dangerous. Such a message should also be conveyed to any organisation that has a pastoral care role, such as religious organisations, working with those in favour of banning conversion therapy in such organisations to strengthen the message.

We are also supportive of the need to strengthen the rights of trans and non-binary people. We would urge that politicians discussing these issues recognise

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the trauma that can occur when people feel their right to exist and have their own identity gets challenged by politicians, particularly when the language used to is dehumanising and trans/non-binary voices are excluded from the debate.

We are however concerned about the actions contained in the plan that use the terms 'consider' and 'explore'. For example:

*“Consider establishing an NHS Wales-wide review on trans people’s medical records, led by trans communities, to promote trans people’s engagement with healthcare”*

*“Consider undertaking a thorough investigation into how LGBTQ+ people in Wales have been impacted by the Coronavirus pandemic.*

We would suggest that the Action plan is strengthened by using stronger language. Many of the actions under 'consideration' are actions that should be part of the plan, and investigating and reviewing policy to seek to improve it should be routine. We would particularly support reviews of both the above areas, and would suggest they be carried out by people with lived experience. In addition, we would recommend removing 'consider' entirely from specific plans, and committing to the delivery of much-needed change.

We also have some comments on the following areas of the plan:

### **Health services**

We welcome the proposed actions in this section of the plan; however, we feel they do not challenge existing models of service delivery. Many LGBTQ+ people face barriers in accessing primary care services, not least the fact that in many areas of Wales there is no choice of the GP practice or Dental Surgery that is available to people. Sometimes LGBTQ+ have faced staff in the local GP surgery who have prejudices, or perceive the service as unable to maintain confidentiality. This is one reason why sexual health clinics have been located outside of traditional GP settings, and have focused on maintaining anonymity and confidentiality. We would suggest the WG considers ways of expanding choice within Primary care, so that LGBTQ+ people can choose to access health services in a more suitable and appropriate setting. This should include non-medicalised community Mental Health services. The Welsh Government should look at other barriers LGBTQ+ people face when needing to attend services, such as use of public transport – which can be traumatic in itself.

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Linked to the above is recognition that the Wales Gender Service is new and remains inaccessible for many in some parts of Wales. The Welsh Government should endeavour to ensure that all Health services are suitable and accessible in all parts of Wales.

Furthermore, we would call for the plan to ensure that the NHS is welcoming and safe for all, ensuring access to trauma informed community-based services. When it comes to specific services, we would suggest that the government considers whether the NHS is the most appropriate provider. We believe some services may be better provided using practitioners with lived experience, or by organisations with expertise in reaching LGBTQ+ people. The Welsh government should ensure that this factor is considered in the design of services.

We are pleased to see that the Fast-Track City initiative is available in Cardiff, though we would like to see this rolled out across Wales. Although HIV is not a killer anymore, still only a small percentage of gay, bisexual and pansexual men get tested and have use of PrEP. This fear of catching HIV and the stigma plays a huge role and has a negative impact on an individual.

## **Children and Young people**

We welcome the acknowledgement that discussion of relationships and sexuality within Schools has been too heteronormative, and still affected by the disastrous legacy of Section 28. We would encourage the Welsh Government to ensure that all schools are required to provide appropriate healthy relationships education, and to create safe spaces for the discussion of these topics – notwithstanding the elephant in the room here that LGBTQ+ young people within faith-based schools are unlikely to feel safe in such an environment.

We also acknowledge that misinformation can cause more harm than good, so we would encourage that the Welsh Government ensures appropriate healthy relationship education to young people is carried out by qualified people. Thus, we call for Youth Workers and Teachers to be fully trained as a priority regarding healthy relationships, especially around the difference of sexuality and gender identity.

We would suggest the plan should also ensure that funding is provided to schools for updating, renovating or remodelling their toilet and bathroom provision. This is often a false debate that is thrown at trans people, and ensuring that schools have a budget to make changes that encourage gender

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neutral, self-contained cubicles, will enable schools to create safe spaces for all young people, rather than continuing to put trans people at risk.

We would call for Estyn to inspect the approaches to equality and inclusion taken by schools, specifically ensuring they interview relevant young people about their experiences – an approach that could and should be adopted for other protected groups, such as young people with disabilities.

We also want the plan to ensure that schools are a safe space for children and young people to talk openly about their sexuality and identity, but more importantly a place to report any form of discrimination or hate on the grounds of sexual orientation or gender identity. Platform would welcome all schools become a 3<sup>rd</sup> party reporting centre for hate crime and incidents.

## **Housing, Safety and Community**

We are disappointed to see a lack of recognition of housing and homelessness within the Action Plan. LGBTQ+ people have often experienced homelessness and poor housing, being more likely to have to leave unsafe family environments sooner than other young people, and also experiencing prejudice in the private rented sector. We would like the action plan to recognise this, and to ensure that LGBTQ+ people are considered priority need within the homelessness system (until the category is phased out in favour of a duty to house all). We would like the WG to ensure that all social housing allocation policies throughout Wales to reflect the discrimination and vulnerability of LGBTQ+ people, noting that increasing the amount of social housing available will make this easier to do.

We would like prejudice and discrimination to be explicitly regarded as grounds for removal of a landlord's license within the private rented sector.

We are pleased that the action plan specifically targets violence against women, domestic abuse and sexual violence in the LGBTQ+ community, and commits to gathering more data and raising awareness of this issue. We would also call for the funding of appropriate provision of suitable refuge facilities and other support such as access to counselling etc.

In general, across the communities' section, we would encourage stronger language and a clearer commitment to protecting LGBTQ+ people from discrimination. In terms of sport, which is often a key part of people's mental health journey, we would like a clear reference to any sports bodies funded by the Welsh Government to remain trans inclusive, including Sports Wales, FA

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Wales, WRU, and others. Funding by the Welsh Government should be contingent on trans and LGBTQ+ inclusive policies.

The same should apply to arts organisations, and any others that receive Welsh Government funding, but given the status of debate around sports participation by trans people, and its continued use in driving hate, the sports organisations should be prioritised to ensure the safety and inclusion of trans people.

## **Resourcing**

As the consultation specifically asks the question of resourcing the Action plan, we have the following comments:

In recent years, there has been a trend away from ring-fenced funding to Local authorities in favour of larger grants with the flexibility for Local Authorities to fund services according to local need. Whilst we understand the rationale for this, particularly within the context of a challenging budget, there may have been unintended consequences of this – particularly in relation to spending on services and projects with a specific focus on minority groups. We would therefore ask the WG to commission independent research examining the impact of this on equalities.

Platform also believes that thriving communities are essential parts of helping to both prevent people from experiencing a Mental Health crisis, and as an important part of their recovery. It is clear that it is local government that potentially has the greatest role in supporting and growing these communities. Yet austerity has meant that it has been non-statutory services that have experienced the most cuts, impacting community facilities and the ability for communities to connect. We would thus ask for the Welsh Government to ensure that resourcing the LGBTQ+ action plan is not at the expense of other public services that contribute to creating thriving communities.

Furthermore, the budgets are not the only resource consideration. Public services require skilled staff with access to appropriate professional development and training. Yet there has been inconsistency and varied quality of equalities training within Public Services in the past, with it too often regarded as a 'tick box' exercise rather than something that can help an organisation review, learn and improve how all its services are delivered to a particular community. The Action plan therefore needs to consider how it can embed the values and skills required to deliver its proposals within wider public sector organisations. Moreover, we would note that many public sector organisations still do not have

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workforces reflective of wider society, and would suggest that they actively seek out people with lived experience to deliver services where appropriate.

Finally, we would propose a different approach to services contracted out or commissioned as a result of this action plan. We don't believe that asking organisations to compete on cost or narrow strict criteria will necessarily deliver a better service. We would propose that commissioners design contracts in conjunction with the organisations that may wish to provide the service, ensuring genuine co-production and contracts that avoid un-necessary bureaucracy or stifle innovation.

We would welcome the opportunity to discuss further.

Yours Sincerely

James Radcliffe  
Head of Public Affairs and Influence