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Dear Chair,

We are writing to ask your Committee to review the Government's LGBTQ+ Action Plan in the light of policy and research developments since it was finally published in early 2023.

Lesbian, Gay and Bisexual Alliance Cymru (LGBAC) is a grassroots campaign group with members across Wales. Since 2020, we have been proud to represent the interests of people who are same-sex attracted, putting their views to policy makers and legislators while rebuilding our communities. We have criticised the Welsh Government approach to services for our communities, but have found it difficult to ensure Members of Senedd understand the diversity of our experiences.

Without 'sex', there is no 'sexual orientation'. We uphold the importance of young people understanding that biological sex is real, immutable and important in their lives. Further, we emphasise that sexual orientation and 'gender identity' (a poorly defined but often used term) are not the same, and the life outcomes of these different groups are not well served by the way the Action Plan insists on bringing them together. We have seen poor results for our members, particularly younger people, in terms of their health and participation in their communities. The Education chapter of the Action Plan has 9 recommendations, together with a further 4 recommendations particularly relevant to the Committee. We have attached our responses from the consultation.

We are profoundly concerned at the promotion of gender ideology to young people. We know that young people who are same-sex attracted are experiencing pressure to adopt a trans status, and enter the pathway to medical intervention. Life skills in the critical evaluation of data and life experience is being radically undermined; young people encouraged to alter their bodies rather than join those people working for a fairer world.

We draw the Committee's attention to the growing concerns of education professionals and the public, to the poor data in this domain, and to relevant elements of the Cass Review, all addressed in more detail below. Combined with the withdrawal of supporting documents from the government's website, with no reason given, it is clear the Action Plan is outdated and in need of complete review.

We ask you to include this issue in the next work programme, in line with your work on Ministerial and legislative scrutiny and your specific concerns around children on the margins and the implementation of education reforms.

We have sent a similar but not identical letter to the Chair of the Health & Social Care Committee, and recognise this may be an opportunity for joint working.

Yours sincerely

Lesbian, Gay and Bisexual Alliance Cymru
Hawl i fod, hawl i fyw, hawl i garu yr un rhyw

(1) Increased recognition of challenges by education professionals and the public

When we responded to the draft Action Plan, we described the curriculum-based recommendations as ‘woefully disingenuous’ and condemned ploys to uncritically embed gender identity theories within schools. The concerns we raised at that time are being borne out by more recent events.

Parents are increasingly concerned to understand what their children are being taught in school, the provision of space and sex-appropriate facilities and the confusing array of policy choices being made by schools. Earlier this year Merched Cymru used FoI requests to survey schools across Wales and found a damning level of failure to ensure basic safeguarding. The full report is at https://merchedcymru.wales/wp-content/uploads/2024/03/Merched-Cymru-Toolkits_FINAL.pdf. The survey found that schools varied hugely in their responses to children questioning their gender, including unquestioning affirmation of children’s ‘trans’ identities, concealing information from parents, forced or coerced speech and not considering other reasons why a pupil may be struggling with identity issues.

The report points out ‘[s]uch approaches are incompatible with long-established and universally accepted safeguarding principles and fail to respect the privacy, safety and dignity of other children, including those with other protected characteristics. These approaches also ignore the right to belief of children, teachers and other school staff as protected under the Equality Act 2010. They are doing real harm to children and their families, as our case studies show.’

These concerns are directly related to schools’ apparent willingness to allow third party providers to teach using materials which cannot be shared with parents. The legitimate interests and beliefs of guardians and families should never be overridden by so-called commercial confidentiality. Any such requirements should automatically disqualify a provider. We have been pleased to see encouragement to share such material in the curriculum guidance on Hwb, but we continue to hear reports that schools are socially transitioning children without informing their parents. The Cass Review describes this as itself ‘an active intervention’ with potentially significant psychological effects.

Although the RSE curriculum is intended to be objective, critical and pluralistic, the Merched Cymru research shows that the most common suppliers of RSE content to Wales’s secondary schools all promote the concept of gender identity as fact. The Action Plan thus continues to endorse the teaching of content which could be profoundly harmful. In particular, we have anecdotal evidence of young people unable to speak up for being lesbian or gay – that is same-sex attracted because to do so is deemed ‘transphobic.’

Our concerns about third party materials which deny the reality of the human body being tolerated or even celebrated in our schools extend beyond the classroom. In November 2024, a leaflet from the charity Hey Girls has been handed out to primary school children in the Vale of Glamorgan, telling 11-year-olds that ‘men’ (ie girls or women with a trans identity) can have periods, and that when they do their dysphoria gets worse. A child getting to grips with menarche does not need such material which, by using the term ‘menstruating body’, simply makes it impossible to talk about the difficulties and risks she experiences. (It

also undermines their laudable work to combat period poverty.) We know parents are raising this misinformation with the LEA and schools. We have already noted that denying the biological reality of sex also undermines the truth of same-sex attraction.

The Committee will be aware of the intense public debate about sport, especially whether men who identify as women should be allowed to play on women's teams. The penalties for players in the UK who object to this position has been thrust into the limelight recently by the case of the 17-year-old girl who has received a six-match ban for challenging the presence of her bearded opponent on the opposing team, given she was concerned for her safety. (Reported by the BBC at <https://www.bbc.co.uk/sport/football/articles/cvgk0w726w1o>.) Sport is of course fundamentally important to the wellbeing of young people, as they have themselves identified (<https://www.sport.wales/research-and-insight/school-sport-survey/lifelong/#:~:text=5.2%20PE%20and%20sport%20helping,to%20achieve%20a%20healthy%20lifestyle>). Yet little study of how to attract young people into physical activity recognises the different experiences of lesbians and gay men. Although it has not been formally studied (see below), the experience of many lesbians is that sport has offered role models and a valuable social outlet. For gay men, the opposite has been true, with the pitch and the locker room known to be hostile environments.

Our view is that sex is fundamental to segregation in almost all sports, and that encouraging participation includes addressing these varied contexts between our communities. We made this position clear in our response to the Action Plan and in consultations by Sport Wales. Nonetheless, the Action Plan still focuses on people with a trans identity (recommendation 25) and does nothing to help broader physical activity.

Teacher, parent or student discomfort with the 'queered' curriculum is too often dismissed as based in prejudice and studied only as faith based. Yet we know many in all three categories whose concerns come from the failure of resources which recognise the biological, political and personal salience and immutability of sex. It is time for thorough scrutiny of the current policies driving the adoption of such policies and materials.

(2) Data changes

Studies (such as Littman, 2018, at <https://doi.org/10.1371/journal.pone.0202330>, and Rawee et al, 2024, at <https://link.springer.com/article/10.1007/s10508-024-02817-5#citeas>), the evidence of detransitioners and our own anecdotal understandings confirm that many gender-questioning young people grow up to be happy homosexuals after support with talking therapies, without risking infertility and other major health disadvantages. Yet our own youth and education services have not properly addressed the key concern that affirmation approaches end up as conversion therapy for young people who are same-sex attracted.

Almost all the data available in this area is compromised by poor samples size, self-selection, lack of longitudinal data, poor research structures and biased investigation. The Lesbian Project recently commissioned overviews into available data regarding lesbians' wellbeing which highlights the lack of definitions in much of the available material. In the

present environment is crucial to properly define ‘woman’ or ‘man’, ‘female’ or ‘male’. In securing positive outcomes in education and wellbeing, this becomes even more important.

When it comes to lesbians (and, by extension, gay men and bisexuals) it is also necessary to distinguish between identity (the most common metric at the moment), attraction and behaviour. The authors note that *‘[s]tudies that define lesbians according to self-identification, which are the majority, are likely to include trans-identifying males and exclude same-sex attracted trans-identifying females. Definitions are often inconsistent, and the self-selecting samples used in many studies limits the extent to which findings are relevant for ethnically diverse, lower-educated lesbians (among others). A further issue with using identity, rather than attraction and/or behaviour, to define sexual orientation is that findings may vary depending on the definition used.’* Of course, we know the importance of these distinctions from the communications lessons of the height of the HIV epidemic. In many contexts, it is crucial to address behaviour rather than labels.

The authors of the Lesbian Project research note in their Overview, *‘[e]ven the highest-quality evidence – systematic reviews and meta-analyses – are often poor quality when they summarise data about lesbians, due to problems with the underlying studies that inform them.’* (p3) Recognising these difficulties, their health-specific study suggests the collective research available shows that *‘bisexual women demonstrate worse [physical] health than lesbians across many studies, and lesbians tend to report worse overall health than heterosexual women ... lesbians appear to have worse mental health than heterosexual women, on average, and better mental health than bisexual women.’* (Reports available at <https://www.thelesbianproject.co.uk/resources>.)

Given the level of public concern about this issue, it is unfortunate that Welsh Government appears uninterested in staying on top of the latest research developments, or even maintaining its own website. There are over 70 documents referenced in the Plan (many of them subject to the data criticisms outlined above). At least 25 of these links are broken. Searching directly does enable access to most, but many are behind academic paywalls and at least two cannot be accessed by people affiliated with HE institutions in Wales.

To emphasise the unreliability of so much data in this area, in September 2024, the ONS downgraded its 2021 census data relating to people identifying as trans in England and Wales. This was welcomed by the Statistics Authority (<https://osr.statisticsauthority.gov.uk/news/osr-publishes-its-final-report-on-the-review-of-the-statistics-collected-on-gender-identity-during-the-england-and-wales-census/>). The core reason for the large number of positive responses seems to have been a poorly constructed question, confusing to people whose first language was not English. This difficulty was revealed by a far more credible result in Scotland where the question was different. The acceptance of such a poor approach by the well-respected ONS seems to us of a piece with the rush to accept affirmation and complex language structures which has marked the rise of a particular approach to gender.

Such findings illustrate the many difficulties for policy in simply creating a single acronym ‘LGBTQ+’ and assuming the same responses will serve all relevant communities equally. Just as Covid rightly led to a re-examination of policies and health information for ethnic

minority communities, we urge the committee to recognise the importance of disaggregating sexual orientation from 'gender identity'.

We ask that the Committee, if it agrees to a review of the Action Plan, ensures proper and robust data is key to recommendations affecting children and young people, and recognises that our concern for younger lesbians and gay men is founded in increasing evidence from those young people.

(3) The Cass Review

The final report of the Cass Review makes sobering reading for anyone who is concerned about the impact of affirmation-only approaches to young people questioning their gender and/or sexuality. It is the most thoroughly researched review of which we are aware, taking cognisance of the experience of young people, their families, professionals in the field and academic research. Baroness Cass (as she now is) has been clear about her commitment to and care for young people, and the need to ensure medical interventions are well-evidenced and in their best interests. The UK government has accepted the Cass Review in full but, after some debate, Senedd agreed only to 'note' its findings. We ask that the Committee scrutinises the importance of the Review for Government policy.

The Cass Review makes clear that data in this area has been poor, especially regarding clinical evaluation of medical interventions such as puberty blockers compared to talking therapies. Our members are especially concerned that *'[t]he Review [was not] able to obtain recent data relating to the sexual orientation of the GIDS patient cohort. When asked, mixed responses were given by GIDS clinicians about the extent to which they explore sexuality with patients seen in the service.'* (p118).

The Review was commissioned by and advises NHS England. It contains much useful information not only for the NHS in Wales but for anyone involved in the care and education of young people. Section 12 specifically looks at 'social transition' and the challenges it represents for schools and families. This chapter shows the extreme difficulty in assessing the data in this area, the real question marks over school acceptance of 'transition' and the challenges to expecting the school to keep secrets from parents.

The First Minister, in her previous role, welcomed the Review and relied on the procurement and referral routes to 'align' Wales services to the Cass recommendations. (<https://record.assembly.wales/Plenary/13906#C587182> shows her statement to Senedd in May 2024.) We welcome this statement, including her concern for service users who are 18 and over, and instruction that NHS Wales takes on board the recommendations of the Review, ensuring consistent and complete data collection.

It is our strong view that the recommendations of the Cass Review, which we support, are not compatible with the recommendations or underlying ethos of the LGBTQ+ Action Plan. For example, the Review points to the difficulties inherent in the Action Plan recommendations for 'trans guidance' for schools and a 'rights-based approach' to staff training which appears unable to acknowledge or address any actual or perceived conflict.

We continue to urge all services concerned with the wellbeing and education of young people, to invest properly in mental health services both in a clinical setting and in schools. We recognise the real risk that people in distress are pushed towards gender related services as they are perceived as better funded, rather than a caring, clinically underpinned exploration of the range of issues they may be confronting. We know that neurodivergent young people are over-represented but the reasons are not fully understood.

Given the extreme impact of cross-sex hormones, binders and surgery, we strongly urge the Committee to promote clear understanding of the impact of education policy in Wales. We also seek clarity on the current and future status of the Cass recommendations for Welsh services and the evidence base underpinning any divergence from those recommendations.

EXTRACT FROM RESPONSE BY LGBAC TO THE DRAFT LGBTQ+ ACTION PLAN 2021

(Numbers refer to the recommendations in the Plan)

<i>Education</i>		
47	The Welsh Government should provide strategic, comprehensive investment in professional learning and training on designing a fully LGBTQ+ inclusive curriculum. This should include delivering LGBTQ+ inclusive RSE for all.	<p>This recommendation is woefully incomplete and disingenuous, especially in the light of the many robust criticisms made during the recent consultation on the RSE curriculum.</p> <p>Yet again, we see no assurances as to the content, provenance or authority of proposed training. There are no assurances for what criteria will be used to ensure such case studies & learning materials are ‘quality’. Welsh Government need to specify what they consider to be of high quality and if they are evidence-based and scientifically accurate. ‘Strategic’ should not mean confirmation bias and granting of contracts for gender identity theory’s cheerleaders (all too many of whom are represented on the ‘Expert Panel’) without dissent.</p>
48	The Welsh Government should ensure that training must also act to empower professionals to adequately support LGBTQ+ young people and tackle homophobic, biphobic and transphobic bullying, by embedding a rights-based approach.	<p>The rights of children should of course be supported but again this recommendation is inadequate and the theory behind it implies a particular ideology. It is our view that Welsh Government should explicitly confirm and separate teaching biology, health, consent and rights.</p> <p>We particularly note the high numbers of trans presenting people also being autistic. It would be pertinent for staff to also be well trained in autism in order to ‘adequately support’ such young people.</p> <p>Where Welsh Government adopts a reliance on ‘rights’, such rights need to be explicitly stated and outlined to ensure they work alongside the legal duties of parents and their responsibilities for their child. For example, it is not a right for a child to be granted the ability to change their name and have the school even change their registered sex on school registers without their parents’ knowledge. This could result in schools unlawfully granting rights to a child over that of their parents or their legal guardians and risks legal action where families are torn apart unnecessarily.</p> <p>In this context, we urge Ministers to avoid even the appearance of conflict of interest. The documentation cites the AGENDA resource as something which ‘must’ be made available in all</p>

		<p>compulsory learning environments. The creator of the material sat on <i>this</i> ‘Expert Panel’ and appears to be promoting her own resource here.</p> <p>We have noted elsewhere the poor quality of the EIA. In particular, there is no recognition of the actual or perceived conflict with other groups sharing protected characteristics, eg the rights of learners of faith to undertake certain activities in sex-segregated environments.</p>
49	<p>The Welsh Government should provide a centralised suite of resources to help the families of LGBTQ+ young people.</p>	<p>There are no elements in this recommendation which recognise either an alternative perspective, the possibility of debate, or the emerging harms being inflicted on young people by gender extremist ideology. (See our response to recommendation 43 for the emerging evidence of clinical concern about the rush to affirmation and our alternative recommendations on this issue.)</p> <p>The only resource advertised in respect of this recommendation is FFLAG – an organisation which is steeped in gender identity theory. For example, its information booklets and downloads talk about young people being ‘assigned (sex) at birth’ and gives advice on medical pathways etc. Its website suggests the term ‘homosexual’ is offensive, while promoting the word ‘queer’. We utterly repudiate this abuse of language and promotion of slurs.</p> <p>FFLAG also links to other ideological organisations such as Stonewall, Mermaids, GIRES and Gendered Intelligence – all proponents of gender ideology.</p> <p>Such a recommendation (like others) might be acceptable if it linked to scientific and evidence-based organisations which genuinely sought to support children with gender dysphoria. Furthermore, the emerging evidence is that many children with gender dysphoria, if supported and enabled to go through puberty without blocking it, turn out to be gay/lesbian. Having resources which are single-mindedly based on the ideological tenets of gender identity, could be said to facilitate the conversion of many gay and lesbian children and young people.</p> <p>Alongside the risks of medicating children and introducing hormone treatment, we are strongly opposed to such dangerous practices as breast binding, promoted and endorsed by organisations supported by FFLAG.</p>

		<p>Again, we note that the ‘new RSE’ education document referenced in the documentation was overseen by a company, Recognition, owned by a prominent member of the ‘Expert Panel’. Such an apparent conflict of interest damages not only the Action Plan but the reputation of Welsh Government.</p> <p>Finally, we remind Welsh Government that the Education legislation prohibits political or partisan teaching in schools. This entire ideology is deeply partisan and conflicted. Recent debates have illustrated its deeply political nature. It could be argued that the unthinking acceptance of this ideology renders the entire Education section of this plan unacceptable.</p>
50	The Welsh Government to provide statutory national trans guidance for schools and local authorities.	<p>This is an unbalanced recommendation, and the supporting documentation reveals its roots in gender theory. Any pointers to organisations <i>must</i> be scientific and evidence-based rather than rooted in a specific ideology. A properly evidence and supported code of guidance and documentation for schools on supporting pupils expressing conflicts about their sex and gender would be useful.</p> <p>Instead, Wrexham Council trans guidance is promoted as good practice; we have a great many concerns about this and similar toolkits promoted by councils such as Rhondda Cynon Taff and Vale of Glamorgan. Indeed, RCT has recently faced court action on precisely this issue. Guidance issued by Welsh Government must adhere to the law as it is (not as Stonewall or other lobbyists might wish it to be) and recognise the wide range of issues raised in this response.</p>
51	The Welsh Government should continue to invest in hate crime prevention programmes in schools across Wales.	<p>LGB Alliance Cymru is strongly opposed to this recommendation. It should be scrapped completely and replaced with robust, high quality, anti-bullying policies which have been evidenced by their success.</p> <p>Studying the documentation from the ‘Expert Panel’ reveals the intention to use ‘<i>programmes such as police liaison programmes or working with external practitioners to deliver workshops on hate crime prevention</i>’. (See our comments on recommendation 14 regarding the failure to define or even understand the nature of ‘hate crime.’)</p> <p>We note, for example, the conviction of an autistic teenager in North Wales for his vocal confusion over the sex of a trans police community support officer.</p>

		<p>(https://www.womenarehuman.com/autistic-teen-found-guilty-of-hate-crime-for-asking-police-officers-sex-autism-group-condemns-prosecution/.) The young man’s neuro-divergence was ignored in other media comment¹ but is obviously relevant to understanding intersectional issues in creating a safe and inclusive Wales.</p> <p>The incident also illustrates the difficulty for teachers in an approach rooted in criminalisation rather than in understanding difference and addressing bullying.</p> <p>This recommendations risks criminalising children for objecting to an ideology they either don’t agree with or don’t believe in. It teaches children that differences of opinion and points of view are criminal, in direct contradiction to the importance of free speech to democratic renewal.²</p> <p>The Equality Impact Assessment should address this issue, particularly with regards to the effect this may have on free speech and children’s ability to express any objections to certain tenets of ideology as a category of protected belief.</p> <p>For example, Welsh Government should ask whether young people are allowed to reject gender identity ideology. What if a young lesbian rejects the advances of a trans-identifying boy? Will that be seen as ‘discriminatory’ or worse still, transphobic and therefore a ‘hate crime’? What happens to children with learning difficulties who find the complexities extremely difficult to grasp and retain?</p> <p>Children should be taught <i>how</i> to think (for themselves), not <i>what</i> to think (by others).</p>
52	<p>The Welsh Government should explore how they can support Colleges and Universities in Wales to develop and maintain LGBTQ+ inclusive environments, potentially through establishing an Excellence Mark to recognise best practice.</p>	<p>We are opposed to (another) scheme or marketing ploy designed to embed gender identity theory without critique. Welsh Government will have seen the increasing concern about the existing Champions Scheme run by Stonewall, not least the recognition that it promotes incorrect views on the legislation involved. (A detailed analysis can be found at https://legalfeminist.org.uk/2021/02/01/submission-and-compliance/.)</p>

¹ For example, <https://www.walesonline.co.uk/news/wales-news/teen-prosecuted-after-asking-whether-17651755>

² For a recent analysis of this relationship see <https://www.wcia.org.uk/blogs/democracy-under-attack-freedom-of-information-speech/>

		<p>We are concerned that setting an ‘Excellence Mark’, will utilise the model of the Stonewall Workplace Equality Index, which simply affords that group the opportunity to profit from such a system. Only Stonewall are put forward as an example to follow. Instead, Estyn should be sufficient to ensure best practice in Further Education, regarding LGBTQ+ inclusivity and other equalities matters. Universities should be free to operate within the law in order to maximise their own financial gains.</p> <p>An ‘Excellence Mark’ will potentially engender discriminatory ranking in terms of treatment of one group over another and enable institutions to capitalise on the ‘kudos’ of having that ‘mark’. We recommend that colleges and universities be encouraged to develop best teaching practice, where equality and diversity is embedded throughout the curriculum, while upholding core academic and democratic values of free speech.</p>
53	<p>The Welsh Government should consider options for the targeted funding of academic research into the experiences of the LGBTQ+ population of Wales.</p>	<p>The recommendation appears uncontroversial but we note that impartiality is lacking. The ‘Expert Panel’ states that <i>there remains a number of significant research gaps in regard to LGBTQ+ people’s experiences in Wales.</i> For once, we agree with them. However, we do not trust this Panel, or any volunteer-led successor, to oversee rigorous or useful research.</p> <p>The work done so far has been focussed heavily on the ‘felt identity’ of “queer” people, rather than the material reality of LGB people, many of whom reject the label, ‘queer’. There is no real evidence provided (beyond one focus group) of any effort to research the diversity of experience or opinion in Wales. Where there is research it is all too often, partial, lacking in quality or heavily biased. (See part 4 of this response.)</p> <p>If Welsh Government is to undertake or commission any further research into the experiences of LGBTQ+ individuals or communities in Wales, it must ensure it is rigorous and independent, and that it must consider issues such as selfID, gay/lesbian dating sites and single-sex spaces. If it claims to explore the experiences of all these diverse communities, it must do so honestly, rather than focusing only on the lives of one group.</p>
54	<p>The Welsh Government should work with Careers Wales to improve the delivery of specific careers support for LGBTQ+ young people.</p>	<p>We recognise that young people in the LGBTQ+ communities face specific challenges in deciding and entering their chosen careers. In that context, we welcome this approach.</p>

		<p>We are, again, concerned that there is no assurance of a broad range of approaches; the evidence base is narrow (relying on one Stonewall report) and leaving the issue with Careers Wales to sort out. We fear that this recommendation, rather than focusing on young people (especially post-Covid), was an afterthought on reviewing the life-journey model of the plan.</p> <p>We would welcome a broader review of this issue, related to our concerns about removing identifiers on recruitment, set out above at recommendation 11.</p>
55	The Welsh Government should examine how well LGBTQ+ people can access lifelong learning opportunities.	We support this recommendation, in the context of our broad concerns about definition, free speech and data collection.
<i>Other recommendations of particular relevance to the Committee</i>		
15	Work with the tech companies and media platforms to tackle hate crime and misinformation.	<p>We recognise the acute challenges represented by the social media platforms' failures to address misinformation, for example on the pandemic. However, this recommendation is completely unrealistic, especially when government will not even put age restrictions on pornography which brutalises and dehumanises women. Welsh Government should also be aware that lesbian and bisexual women are specifically fetishised and brutalised in pornography and this is taken onto the streets of our towns and cities.</p> <p>At the very least, such a recommendation requires workable and genuinely intersectional definitions of 'hate crime' and 'misinformation' . Will calling people (including many authors of this response) a 'terf' become a hate crime? (See https://www.feministcurrent.com/2017/09/21/terf-isnt-slur-hate-speech/ for some context.) Without an approach which includes misogyny, we cannot support this recommendation.</p> <p>We note the existing challenges to free speech through the growth of misconceived legislation and policing at our response to recommendation 14. Given the ideological content on this Action Plan, this recommendation has the potential to become repressive.</p>
19.	Work with the youth work sector to find a longer term sustainable funding model for organisations, including in the voluntary sector, who provide	Whilst we support the need for sustainable funding, we particularly want to ensure that young people are not encouraged down a pathway of irreversible medical intervention because of peer, online or parental pressure.

	<p>support for a wide range of young people with differing backgrounds and needs, including support for LGBTQ+ young people. Future strategies including the work of the Interim Youth Work board should consider equality and diversity for all young people.</p>	<p>We strongly assert that more inclusive youth work should not become a cover for unquestioning affirmation but be part of watchful waiting for young people questioning their sexuality or gender.</p> <p>We are horrified at the explosion of young girls seeking gender identity services in recent years. We understand that there is also a very recent but detectable rise among young boys³. We consider this an indictment of our society that young women would rather submit to radical surgery and hormonal change than be happy, healthy adults in their bodies, and quite possibly lesbians.</p> <p>Rather than a culture of such assaults on bodily integrity and health, youth work should be challenging the stereotypes and misogyny which is driving young people into such pathways.</p>
23.	<p>REPRESENTATION – Culture & Sport</p> <ul style="list-style-type: none"> ● Reach out to LGBTQ+ individuals, groups and communities inviting them to support the design and development of holistic approaches across the Culture and Sport sectors in Wales, and building on the existing work of public bodies represented in the Public Body Equality Partnership. ● Improve LGBTQ+ representation in the Culture & Sport sectors in Wales at all levels, including at Board, workforce and volunteers’ levels. ● Use national and local collections in the Culture and Sport sectors in Wales to celebrate and share LGBTQ+ stories and histories, providing funding where appropriate. ● Consider how to provide greater focus on equality as part of skills development, work 	<p>We have been pleased to contribute to the equality debates promoted by Sport Wales earlier this year. We pointed out that sport is an area where the experiences of different communities gathered under the leaky ‘umbrella’ of ‘LGBTQ+’ vary widely. We recommend that the Welsh Government and Sport Wales should do further research on those different experiences, the value of role models, of bonding, or access to facilities. For example, many, many gay men have experienced extreme bullying within the sports environment, sometimes with tragic results. By comparison, lesbians have often found sporting environments a haven with strong role models emerging, especially over the last 50 years.</p> <p>Sport is also contested around single sex spaces. We assert the importance of enabling single sex spaces, particularly for young people (male or female) and for people of faith. It is unfortunate that the focus groups, so narrowly drawn, prioritise only one person’s experience (however disturbing) without considering the broader impacts on other groups with protected characteristics of recommending mixed sex facilities.</p> <p>We agree with the aim to improve representation and access but repeat our ambition for better understanding of how sport and access to sport differs among our communities.</p>

³ Helen Joyce, interviewed on *A Wider Lens*, September 2021

	<p>experience, volunteering, mentoring and apprenticeship opportunities.</p>	<p>We agree to the ambition to use national and local collections to better reveal the stories of our communities. We hope that if funding is available it is used to uplift all marginalised communities, and that where a sportsperson has clearly identified themselves as (for instance) gay, they are not later misidentified or put into a broader category that does not represent their experience.</p> <p>We always welcome a greater emphasis on equality and representation. Our general comments on overarching aims demonstrate our concerns about how this is being interpreted by Welsh Government to stifle opinions and erase the experiences and reality of lesbians, gay men and bisexuals.</p>
30.	<p>Evaluate specific LGBTQ+ projects, such as the Ty Pride project, and gather best practices and principles to share with local authorities regarding LGBTQ+ homelessness.</p>	<p>We welcome the desire to promote best practice, within the general context of our concerns about data collection and definitions.</p> <p>We note that the Ty Pride project claims LGBTQ+ young people are ‘five times more likely to be made homeless than their peers’. We have seen no source for this claim and would welcome well-evidenced and robust research into the experiences of our communities. The failure to disaggregate and examine such claims makes identification of good practice much more difficult. In our response to recommendation 13 we assert that more inclusive youth work must not become a cover for unquestioning affirmation but be part of watchful waiting for young people questioning their sexuality or gender. The same caveat applies to specialist homelessness provision for young people.</p>