



Thoughtful Therapists

**Conversion Practices Bill 2026:
A threat to the free speech rights of
children, parents and therapists.**

Thoughtful Therapists are a group of counsellors, psychotherapists and psychologists fighting to preserve ethical therapy in the face of the political imposition of queer theory and gender identity ideology.

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Introduction:

This document, produced by Lucy Beney and Peter Jenkins, sets out our reasons for opposing the current Draft Conversion Practices Bill, as a threat to the free speech rights of children, parents and therapists. It starts by summarising the main provisions of the Draft Bill in clear language; sets out our main concerns about its potential impact; provides four brief case examples drawn from our work as therapists; and looks at some of the potentially damaging impact of the proposed Conversion Practices Protection Orders.

Summary of the Conversion Practices Bill 2026 (PJ):

The Bill introduces a new criminal offence of abusive conversion practice:

- Covers **England and Wales**; also applies to **encouraging** similar abusive conversion practices outside the UK;
- **Definition** of abusive conversion practices covers both: **sexual orientation** (including persons who are *asexual*); and **transgender identity**; latter includes transsexuals, persons seeking gender reassignment under the Gender Recognition Act 2004; and persons who are non-binary;
- Excludes **activities** carried out in the course of providing **health care services** (or similar non-medical services) to the individual, unless these fall “far below the standards reasonably expected of a person in their position”, i.e. the standard for determining ‘*gross negligence*’;
- Constitutes a criminal offence, i.e. **abusive conversion practice**, if:
 - **including** words or behaviour, which are: sexual, violent, threatening, controlling, coercive; applying economic, psychological or emotional pressure;
 - **causes** serious harm to the individual’s physical or mental health, or serious alarm or distress to the individual which has a substantial adverse effect on their usual day-to-day activities;
- Offence applies to individuals, and/or formal and informal organisations;
- Offence punishable by fine or 5 years imprisonment;

Conversion Practice Protection Orders:

- Introduces preventative or protective **Conversion Practice Protection Orders (CPPO)**, which can be applied for by the proposed subject, the police, local authority, **or any other person**;
- The CPPO can carry conditions for a set period, and does not require notice to be given. It can be sought both within civil (Family Court Proceedings) and criminal proceedings;

- Offence applies to individuals, and/or formal and informal organisations;
- Breach of a CPPO can lead to arrest or legal action for contempt of court in civil proceedings. A criminal breach of a CPPO can lead to a fine and 2 years imprisonment.

Cabinet Office (CO) (2026) Conversion Practices Draft Bill. CP 1604.

<https://www.gov.uk/government/publications/draft-conversion-practices-bill/conversion-practices-draft-bill>

NB: References above in *italics* from:

Office for Equality and Opportunity (OEO) (2026) Explanatory Notes to Conversion Practices Draft Bill. CP 1604.

<https://www.gov.uk/government/publications/draft-conversion-practices-bill/explanatory-notes>

Response to the UK Conversion Practices Draft Bill (LB):

The stated aim of this draft legislation is to create new offences “in relation to the carrying out of abusive conversion practices on individuals; to make provision for conversion practice protection orders: and for connected purposes”.

The bill defines “conversion practice” to mean “any conduct carried out by a person towards an individual with the intention of causing an individual to believe that they have, or do not have – or to believe that they have, or do not have – a sexual orientation, or a particular sexual orientation, or a transgender identity, or a particular transgender identity.

There is an exception for people providing “health care services”, unless the professional “acts in a way that falls far below the standards reasonable expected of a person in their position”. There is no such protection for parents, friends and family, teachers, youth workers, or pastoral and religious leaders (despite religious belief being a protected characteristic).

This response is focused primarily on the serious and harmful consequences of this draft Bill becoming law, for anyone interacting with people – and especially children – who identify as ‘transgender’, or who believe themselves to be ‘transgender’, and the comprehensive failure in safeguarding and child protection which will result.

What are the issues?

1. The draft Bill ignores the reality that abusive practices – physical, sexual, psychological, emotional and financial – are already illegal in this country. Sexual assault and harassment are already offences, as is violent behaviour. Controlling or coercive behaviour of different kinds already carries a maximum penalty of up to five years in prison (Serious Crime Act 2015).

2. The draft Bill legislates around a belief system – gender ideology – which is not shared by most ordinary people or scientists, and which has no basis in fact or objective, observable truth. A [YouGov poll](#) commissioned by campaign group Sex Matters in May 2025 found that a clear majority of the British public believes that the Supreme Court was right to rule that when the Equality Act provides rights based on people's sex, it means biological sex.

Gender ideology, meanwhile, asserts that human beings have a separate 'gender identity', and that its importance outweighs biological sex. Creating a new offence, causing an individual "to believe that they have or do not have, a transgender identity or a particular transgender identity" allows no provision for the majority who don't believe in the concept at all, and whose 'gender critical' beliefs are already protected in law. It is unclear how the right to believe sex is binary and immutable will interact with a requirement to accept a transgender identity.

3. The draft Bill, most unusually, does not differentiate between children and adults. The draft legislation is based upon the provisions of the Memorandum of Understanding on Conversion Therapy ([MoU](#)), a document most recently updated in July 2024, and signed by thirty or so organisations and public bodies involved in healthcare and therapy. The MoU takes no account of age or immaturity when working with young people. This led the UK Council for Psychotherapy (UKCP) to withdraw its support two years ago, over concerns around child safeguarding.

The draft Bill takes no account of child development, or how the emergence of 'identity' is an ongoing process, influenced by many different factors which can change over time. The idea that adults – many with vested interests – should unquestioningly 'affirm' a child's belief about who they are at any given point in their development is highly irresponsible. When this 'affirmation' can lead directly to irreversible modification of a healthy body, through drugs, hormones and surgery, it is inexcusable. Adults have a responsibility to safeguard and protect children – from themselves, if necessary – which this draft Bill entirely overlooks.

4. The draft Bill is based on the assertion that no ‘gender identity’ is ‘inherently preferable to any other’ – a position adopted by many organisations, under the influence of transgender activists. According to the MoU, “conversion therapy” includes “a therapeutic approach, or any model or individual viewpoint that demonstrates an assumption” that one particular ‘gender identity’ might be preferable to another. This completely ignores the terrible physical, mental and emotional damage suffered by those trying to live as someone they can never be, and the fundamental difference between biological sex and a cosmetic approximation of that sex. It is self-evidently better to make peace with physical reality, and to live with body, mind and spirit fully integrated, than to live a life of pretence, based on a delusion or ‘over-valued belief’, which requires life-long medical intervention and support. Instead, a healthy young person could be set on a path towards life-long medical treatment and radical surgery, the side effects of which include infertility, sexual dysfunction and incontinence.

5. The draft Bill mentions circumstances in which a person might “identify as neither male nor female, or not as solely male or female”, but there is no mention of people who identify as something other than human. When a person identifies as an animal, or a fantasy figure, it is unclear how this should be addressed, either by professionals, or by friends, family and other associates. There is also little recognition in this draft Bill of the instability of much ‘identification’ – in some cases, ‘identity’, and associated demands for name and pronoun use, change on a weekly or monthly basis. Exploration of this is a key part of effective therapy.

6. This draft Bill is likely to foreclose legitimate and necessary enquiry into a person’s backstory. There are many distressed young people who have been convinced by others – activists, social media and peer group pressure – that their very real emotional pain can be alleviated by adopting a different ‘gender identity’, or accepting that they were ‘born in the wrong body’. Rather than listening to a person’s story, acknowledging their suffering, and finding a healthy route back to wholeness, careless ‘affirmation’ offers only a superficial solution, fraught with danger, and leading to an outcome which is anything but ‘authentic’. Documented factors leading young people towards transgender identification include childhood abuse, developmental trauma, same-sex attraction, domestic violence and exposure to pornography. If adults in a child’s life are obliged to accept unquestioningly a child’s beliefs about themselves, aspects of their story are likely to be shut down. Effective prohibition in the draft Bill risks leaving real underlying issues unaddressed, reducing chances of healing.

7. The draft Bill’s apparent protection for health care professionals is likely, in reality, to prove very flimsy. Any decision over whether or not a “person acts in a way that falls far below the standards reasonably expected of a person in their position”, is likely to rest with professional membership bodies, almost all of whom require acceptance of the

Memorandum of Understanding on Conversion Therapy, as part of adherence to ethical standards. What constitutes “standards reasonably expected” is certainly going to be open to discussion, and to activist influence. Professional malpractice can easily be redefined.

8. Parents, teachers, youth workers and religious leaders will have no defence, should they wish to challenge any aspect of a young person’s ‘gender identity’. In other words, those who know a young person best, and who may have legitimate questions and concerns, could be accused of ‘conversion practice’ if they are perceived to be applying “psychological or emotional pressure”, which of course is entirely subjective. Refusing to pay for ‘gender-affirming treatment’ could amount to “financial pressure”. An offence is committed if someone’s behaviour causes “serious harm to the individual’s mental health”, or “serious alarm or distress to the individual which has a substantial adverse effect on their usual day-to-day activities”. Again, unlike physical harm, this is entirely subjective. Frequently, trans-identifying young people are convinced of their ‘gender identity’ – until suddenly they are not. Offence is taken at any suggestion that things might be a little more complex. Often, their ‘mental health’ is already very fragile. The word ‘transphobic’ is very easily applied to any question or perceived challenge. This could, in future, lead to prosecution.

9. The draft Bill outlines offences which may be committed by “bodies corporate and unincorporated bodies”, which include failing to “take all reasonable steps to prevent commission of the offence”. It is unclear whether or not gender-critical organisations, which lawfully reject gender ideology in its entirety, could be accused of encouraging the practice of ‘conversion therapy’ by failing to affirm trans-identifying individuals’ beliefs about themselves and favouring exploratory approaches to gender-related distress. Organisations in many different sectors campaign for a return sex-realism, which could be interpreted as failing “to take all reasonable steps” to prevent a challenge to trans-identification, and so risk prosecution for their officers. This is likely to have a profound effect on freedom of speech within the law.

10. The draft Bill makes provision for Conversion Practice Protection Orders, which raises a number of issues. First, these are entirely unnecessary to protect people from “abusive conversion practices”, given that these are currently illegal. Anyone engaging in such practices already faces prosecution. Secondly, and more concerning, the draft Bill states that such protection orders could be used to protect an individual from “serious alarm and distress”, and to “secure the health, safety and wellbeing of the individual to be protected”. As outlined above – these matters are entirely subjective. What constitutes the “safety, health and wellbeing” will depend entirely on the ideological position of the individuals concerned. This is a dangerous foundation for legislation. Thirdly, an application for a protection order can be made by “any other person” with the leave of the court, which raises serious safeguarding issues for vulnerable people.

Case Studies Illustrating the dangers in the Conversion Practices Draft Bill (LB):

It is clear that the Conversion Practices Draft Bill was designed with little thought, care or attention given to the kinds of situation which arise regularly in the supporting of children and young people – within families, among friends or in professional settings. These case studies illustrate the complexity of cases, and the dangers of shutting down the exploration of a distressed young person's relationships, experience and environment. To be required, instead, carelessly to affirm any 'over valued beliefs' they may have, is an abdication of adult responsibility.

1. Chiara: A counsellor is supporting Chiara, who identifies as a lesbian. Chiara isn't sure whether or not she has been raped. In response to the counsellor's questions, the girl explains that she is in a relationship with a 'trans girl', and she was expecting a "lesbian encounter". What she then describes is, in fact, heterosexual intercourse with a young man. Chiara had consented to sexual activity but not to "that". The counsellor asked if they had used any form of contraception. "No", answered the girl... "a trans girl is a girl and two girls can't make a baby", although she conceded that her partner has a "girl dick". The suggestion that her partner was biologically male immediately elicited an angry denial and accusations that the counsellor was both homophobic and transphobic – in denying that Chiara was a lesbian, with the suggestion that heterosexual sex had taken place, and also in denying that her 'trans' partner was a girl. Chiara demonstrated "serious alarm and distress". Was the counsellor doing due diligence and acting responsibly, or falling short of "standards reasonably expected", and likely to end up in court under the provisions of this draft Bill?

2. Tom: Tom has always liked animals. As a young teenager, he sometimes found himself wishing that he was an animal. It would be so much easier – there wouldn't be all those social signals to read. He's worried that he's autistic – he's done a couple of tests on social media. He doesn't go out much after school, spends most of his time gaming online, and has created an animal avatar. Recently he's been playing against other 'animals'. One of them has a full animal costume, apparently – a super-realistic 'fur suit'. He also has a 'fursonality'. Tom now believes he was 'born in the wrong body' and into the wrong species entirely. He is in fact, 'fox gender' – because he is playful and likes the outdoors. He wants to be called Silvano – because it derives from the Latin for woods. Under the provisions of the draft Bill, 'transgender identity' includes circumstances in which "the individual identifies as neither male nor female or not solely male or female". Would someone disabusing Tom of the idea that he is an animal, and treating him as one mixed-up boy, possibly being groomed online and urgently in need of safeguarding, fall foul of the law in future?

3. Esther: Esther repeatedly asks her mother how she can get a prescription for testosterone. She is 'trans' – and she 'just knows' she would be happier as a boy. How does she know this? Because she doesn't like being ogled by men – she particularly doesn't like the way her dad enjoys seeing her eyed-up-and-down by his friends. If she had a beard, that would serve him right. She's also very self-conscious about her large breasts and would perhaps like 'top surgery'. Her figure reminds her of her own mother, who she feels is downtrodden and disrespected by her father. She doesn't want to be that person – she repeatedly asks her mother why she stays. Testosterone would also give Esther a deep voice, and people might actually listen to her. It would also mean that she could be feminine – maybe even "like a gay boy" – without attracting heterosexual boys' attention. Her mother talks to a friend about this. The friend is convinced that Esther is not 'trans' and suggests finding a therapist to explore these issues with the girl. Would this count as "encouraging or assisting" someone in 'conversion practice', to be prohibited by the draft Bill?

4. Shaun: Shaun is a teenager, living with his mother and his sister. He is a 'boys' boy' and plays a lot of football. His mother and sister are concerned about him, though, as he has become quite withdrawn and secretive at home, and spends a lot of time in his bedroom. Shaun is, in fact, watching a lot of pornography, which he finds titillating and terrifying in equal measure. To cope, he will suddenly shut down his laptop and go and lie on his mother's bed. It feels calm there – it smells nice. He can hear his mother and sister chatting and laughing downstairs. He feels shame – and longing. He doesn't know how a man should be. He doesn't want to do the things that he's seen done to women online – he likes women – but it seems that that's what it means to be a man. After all, his mates introduced him to it. He thinks it would be so much easier to be a girl. After a shower, he scrapes his hair back and tentatively tries on some of his sister's make-up. Someone completely different looks back at him. He smiles. That person looks cool. The following day, he doesn't watch porn, but looks for videos about transitioning. There are so many. Next week, in school, he tells his tutor – also his football coach – that he is, in fact a girl, and wants to 'socially transition' and be known as Shauna. Shaun's tutor desperately wants answers – but if he challenges this, and refers to Shaun as being 'one of the lads', could he be found guilty of applying "psychological or emotional pressure"?

LB: The cases above are composite and anonymised – but all aspects of the accounts are real, and have come up in the counselling room.

Proposed introduction of Conversion Practices Protection Orders (PJ):

The draft legislation's proposal for a Conversion Practices Protection Orders (CPPO) provides the razor-sharp teeth now seemingly required to effectively police our social attitudes towards trans-identifying people. The CPPO is closely modelled on the Female Genital Mutilation Protection Order (FGMPO), but with apparently absolutely no hint of irony here. FGMPOs provide legal protection against females being sent abroad for genital excision. (There was, however, no equivalent legal protection in place in 2014 in the case of a 16-year-old male child sent abroad to Thailand for major trans genital surgery ([Sloan, 2016](#))). The movement to introduce FGMPOs has a number of parallels with the current proposal regarding CPPOs. These include: initial reforming zeal to address a burning social issue via rather ponderous legislation; weak supportive research on prevalence; and potentially limited evidence of efficacy.

Experience of Protection Orders against FGM:

FGMPOs carried both civil and criminal aspects, and were intended to reshape wider social attitudes, as well as to enforce criminal sanctions. However, the prevalence of FGM may well have been seriously over-estimated ([Karlsen et al, 2023](#)). The results of FGM policy have hardly been impressive in terms of enforcement. Roughly 3 FGMPOs were made per year between 2009 and 2018. None of these resulted in legal action being taken. "Of the 173 alleged offences reported under the Female Genital Mutilation (FGM) Act 2003, only two proceeded to charge and neither were found guilty" ([Karlsen et al, 2023: 213](#)). This is clearly not an impressive balance sheet, in terms of what was, presumably, a well-intentioned flagship social engineering policy project.

Of course, the crucial difference here is that FGM is clearly a real, objective, observable and measurable behaviour, causing serious and often irreparable harm to female victims and survivors. In contrast, conversion practices rest on the foundational concept of gender identity, and on alleged attempts to undermine and change this self-belief. Identifying conversion practices relies crucially on a subjective *perception* of, say, parental intent and behaviour, and on the *attribution* of overall meaning to this process as being coercive and controlling. Conversion practices are therefore radically different in form and content to previously legislating a ban on Female Genital Mutilation.

CPPOs and the Family Courts:

The Bill's main target focus seems to be on family relationships, on the civil courts, such as Family Proceedings Courts, and in facilitating legal action against gender critical organisations. There are a number of cases going through the courts, where parents are in sharp disagreement with each other about consenting to medical transition for children under 18 years. This Bill will enable trans activists, and allied organisations, such as the Good Law Project, to take out Conversion Practices Protection Orders against dissenting parents, or supportive gender critical organisations ('Protect the dolls!'). Unfortunately, the very

agency designed to independently represent the best interests of the child in this kind of contested family proceedings, namely CAFCASS, seems also to have fallen prey to conversion ideology. CAFCASS advice for independent social workers is, apparently: “Consider that a child/young person living with a parent or carer who doesn't respect their identity can be at emotional risk and there may be a potential safeguarding concern” ([FJYPB/AYP, nd](#)).

Impact on children and parents:

The spectacle of a dissenting parent being sent to jail, as happened in British Columbia, Canada for refusing to comply with the social and medical transition of their child, may become much more than an academic footnote in the future UK family law context ([Weichel, 2021](#)). Given the astounding lack of age protections, the Bill offers a disturbingly easy route of access for trans activists to intervene aggressively in family life, in order to prevent parents resisting the social or even medical transition of their child of any age, ranging from babies and toddlers up to 18 years.

Despite the many soothing reassurances, the Bill is likely to collide heavily with parents’ rights under Article 8 of the Human Rights Act 1998, namely the right of “respect for his private and family life”. The Bill will also conflict directly with the growing movement of young adults seeking to detransition, that is, expressly to *reject* their former gender identity, often with the help of parents, peers, family, professionals and informal support organisations.

Impact on gender critical support organisation:

This may put gender critical support organisations at risk of prosecution, particularly following the list of groups engaged in alleged ‘conversion practices’ published by Amnesty International, [A growing threat](#). Yet the Bill’s Explanatory Notes appear to be quite misleading here, in stating that the Bill’s prosecution remit will be limited to “defined senior officials in companies and organisations” ([OEO, 2026, para 21](#)). The Draft Bill makes it very clear that the law will enable the prosecution of *ordinary members* carrying out roles within member-led organisations, i.e. “an unincorporated body managed by its members” ([CO, 2026, s.5](#)). The Draft Bill therefore begins to resemble nothing less than a trans activist rescue charter. How it will fare in the civil and criminal courts, given that its role is in direct conflict with the already established right to free speech on gender critical issues, upheld in the [Forstater](#) case and in multiple other similar court cases, still remains to be seen.

Conclusion:

To conclude, the draft Bill is clearly unworkable. It makes a mockery of the safeguarding and protection of vulnerable people, especially children. It risks criminalising almost anyone who refuses to accept highly contested gender ideology as a matter of fact and who wishes, instead, to offer an ethical exploration of emotional distress

Acknowledgements:

LB: Parts of Response to the UK Conversion Practices Draft Bill and Case Studies Illustrating the dangers in the Conversion Practices Draft Bill previously published by Save Mental Health. [Article 36 — Save Mental Health](#)

PJ: Summary of Conversion Practices Bill and the section on CPPOs previously published by Critical Therapy Antidote and Genspect:

<https://criticaltherapyantidote.org/2026/07/07/uk-conversion-practices-bill-queering-the-family-courts-and-upending-child-safeguarding/>

<https://genspect.substack.com/p/queering-the-family-courts-and-upending>

Citation:

Beney, L. and Jenkins, P. (2026) Conversion Practices Bill 2026: A threat to the free speech rights of children, parents and therapists. Thoughtful Therapists.

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