



Sent by email to hiv-aids@who.int

Attention of Dr Tedros Adhanom Ghebreyesus, Director General,
Sir Jeremy Farrar, Chief Scientist,
World Health Organisation

7 January 2024

Response by Fair Play For Women to WHO consultation on "a guideline on the health of trans and gender diverse people"

Who we are

Fair Play For Women Ltd is a campaigning and consultancy organisation which raises awareness, provides evidence and analysis and works to protect the sex-based rights of women and girls in the UK. Founded in 2017, our work is focused on understanding when and how gender-and sex-based rights conflict in law and policy making. Our aim is to ensure that everyone's needs are fairly balanced and that women and girls are not forgotten in good policy-making.

We believe in compassion and fairness for all. We support the rights of trans people to live in safety and to be treated fairly. We also support the rights of women and girls, and this is our focus. Protecting these rights in law requires that sex is not conflated with gender identity. Any policies considering gender identity must consider the impact of those policies on other service users, particularly females.

Our concerns

We are concerned that the proposed approach to developing the guidelines is dangerously flawed, and that the WHO consultation is rushed. A flawed process and a rushed consultation are not in the interests of those whom the WHO purports to serve. They also risk leading to conclusions and recommendations with unintended consequences or which have an impact on other groups. In this case, we are concerned about the impact on two particular groups: children and on lesbians.

Our specific concerns about the WHO proposals re as follows.

1. The Guideline Development Group lacks balance and has a strong bias towards the promotion of an interventionist approach to gender issues, an approach which is increasingly being called into question by experts around the world.



2. The proposed focus of the guideline has a bias in outcomes built into its specification. It starts with “The provision of gender-affirming care, including hormones”, which presupposes gender affirmation and medical intervention as the appropriate response to gender issues. This is highly contested, particularly for children. See, for example, the Cass review in the UK.
3. The proposed focus includes “legal recognition of self-determined gender identity”. This is not a healthcare issue. It is a complex and multi-faceted legal issue which this group is not in any way qualified to address, nor is it a legitimate part of their mandate.
4. The timeline for the group is insufficient for a rigorous review which will generate a robust and reliable set of guidelines. This is too complex, relating as it does to several different patient populations within the overall category of people who identify as transgender, to be addressed and wrapped up in a matter of weeks, as is proposed.

Conclusion

It is in the best interests of everyone directly and indirectly affected by these guidelines that they are developed with care, expertise and attention to detail. The latest evidence from around the world is that simplistic “gender-affirming” approaches can cause harm. Anyone addressing this issue in good faith would wish to take the time and access the expertise to ensure this is not reinforced or exacerbated by the WHO. Therefore we respectfully request that the group reconsiders its mandate, its focus and its make-up.

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www.fairplayforwomen.com