

# My GP is refusing to prescribe my HRT What can I do?

TransActual regularly hear reports of trans people whose GP has refused to prescribe their hormone replacement therapy (HRT).

This resource is for you if:

- You're a UK based trans person over the age of 18.
- Your NHS gender clinic has written to your GP asking them to prescribe HRT to you (this might be recent or it might be that you've been discharged from the gender clinic).
- Your GP has refused to prescribe your HRT (this could be the same GP you've always had, a new GP at your existing practice, or the GP at a practice you've recently registered with).

**If you were originally prescribed hormones overseas** and have recently moved to the UK, you're not the target audience of this resource but a lot of the information will be useful anyway.

If your GP is refusing to enter into shared care with a private provider or will not offer you a bridging prescription, this guidance will not apply because GPs do not have to offer either of these things.

If your GP has refused to prescribe HRT to you, <u>let us know via our online form</u> – we're tracking the situation.

# 1. Ask why

If you haven't already asked your GP why they won't prescribe HRT to you, make sure you do. That will influence your next steps.

# 2. Make your case

Arrange another appointment with your GP to discuss your HRT prescription. Take the following information with you:

- The original letter from the NHS gender clinic recommending you for hormone treatment
- The most recent NHS gender clinic letter which states the dosages for your HRT.
- If you're still with an NHS gender clinic: A letter from a doctor at the clinic (re)requesting that they prescribe your HRT.
- A copy of or link to Endocrine management of gender incongruence in adults: <u>Prescribing guidance for non-specialist practitioners</u>.
- A printout from or link to the <u>prescribing section of the General Medical Council's Trans</u> <u>Healthcare Hub</u> – you might wish to highlight the sections that are most relevant to your care.
- A copy of our <u>Information on prescribing HRT to trans people guide for GPs</u>. Please note that in Northern Ireland there is no locally agreed service for the shared care of prescribing hormones or blood monitoring of transgender patients in Northern Ireland.

Hormone treatment in NI is currently arranged and monitored by the gender clinic and endocrinology.

If you've previously had access to HRT, tell the GP:

- What impact taking HRT had on your mental health.
- What changes your body will undergo if you no longer have access to it, and how that will impact your mental health and life more broadly.
- If you've had a hysterectomy (with removal of both ovaries) or orchidectomy (removal of testicles), remind them that lack of HRT will cause you to go through menopause and ask them whether they've assessed the risks associated with that. You'll find more information about that from <u>NHS Scotland</u> (please note that the page is written with women as its target audience).
- If you've recently moved to a new GP practice, explain that this prescription is simply a continuation of the care that you'd received from your previous GP. Ask them whether they usually refuse continuation of care for new patients and, if the answer is no, ask them to explain what makes your situation different.

If you've not taken HRT before, tell the GP:

- Why you need access to HRT.
- The positive impacts you expect to experience when taking HRT.
- The impact that not having access to HRT is having on you and your life.

You might also find it useful to show them the relevant leaflet from this list:

- Ongoing hormone monitoring and management information Trans masculine
- Ongoing hormone monitoring and management information Trans feminine
- Post discharge hormone management leaflet Trans masculine
- Post discharge hormone management leaflet Trans feminine

### 3. Ask for a second opinion

If your GP practice has more than one GP, ask for an appointment with a different GP. You are entitled to ask for this without offering a reason. If the second GP also refuses to prescribe, move to step 4.

# 4. Complain

There are a number of reasons to complain:

- To gain access to the healthcare you're entitled to.
- To prevent it from happening to someone else in the future.
- So that there's an official record of the refusal to prescribe to you (and others). When institutions are reporting on the complaints they receive and there are clear patterns, they're more likely to raise it as an issue rather than dismissing it as a one-off.

### **Complaints escalation process**

#### Step 1: Complain to the practice or to the local board

Complain to the Practice Manager or to your local Integrated Care Board (England), Health Board (Scotland and Wales) or Health and Social Care Board (Northern Ireland). Regardless of who you complain to, your complaint must be acknowledged within 3 working days and must have been responded to within 6 months (note it doesn't have to be resolved within 6 months, they just have to have responded).

#### Complaining to the practice manager

Wherever you are in the UK, your first complaint should go to the practice manager. In your complaint, make sure you include:

- That your letter is a complaint
- The reason your GP gave you for refusing to prescribe.
- That an NHS gender clinic has advised that you should be prescribed hormone therapy (attach the letter or report).
- How long you've been on HRT and if you've had a hysterectomy or orchidectomy (where relevant).
- What the impact of not having HRT will be for you, including any physical symptoms you might experience if you're losing access to it.
- How the experience of being refused care is making you feel.
- A reminder that the public sector duty requires GP practices to advance equality of opportunity. Mention that you, as a trans person, fall under the protected characteristic of 'gender reassignment' in the Equality Act 2010. If you feel that you have been discriminated against on the basis of being trans (or on the basis of any other protected characteristics), it's important to mention that too.

Include a copy of the Gender Clinic letter asking your GP to prescribe. It may also be useful to include a copy of Information on prescribing HRT to trans people guide for GPs.

#### Complaining to your local commissioner

The complaints policy for your Integrated Care Board, Health Board or Health and Care Board will be available on their website.

When you write to them, remember to include the name of the GP and the name of the practice. Be very clear about what you want to happen as a result of your complaint. Include a copy of the Gender Clinic letter asking your GP to prescribe. It may also be useful to include a copy of <u>Information on prescribing HRT to trans people guide for GPs</u>.

Find your Integrated Care Board (England)

Find your Health and Social Care Trust (Northern Ireland)

Complaining to your local health board (Scotland)

Complaining to your local health board (Wales)

#### Step 2: Complain to the Ombudsman

If your complaint is not resolved, complain to the Ombudsman. It is important to know that you can't ask for disciplinary action as part of the complaint – disciplinary action against a GP would come from a complaint to the <u>General Medical Council</u> (GMC). However, you can ask the Ombudsman to recommend that the GP and/or practice staff attend training and apologise to you.

The Ombudsman is your next stage in escalation if your previous complaints haven't been resolved. It is important to note that your complaint to the Ombudsman must be within 12 months of the incident. However, you wouldn't be penalised if your complaint is later than that if the practice or board take a very long time to give their final response.

There's information on each Ombudsman's process on their website, chose the relevant one from the list:

Parliamentary and Health Service Ombudsman (England)

Northern Ireland Public Services Ombudsman

Scottish Public Services Ombudsman

Public Services Ombudsman for Wales

#### Other organisations you can tell about your concerns

#### General Medical Council

You can complain to the <u>General Medical Council</u> (GMC) about your GP if they have made a serious or repeated mistake in relation to your care, if they have discriminated against you, or have otherwise failed to meet the GMC's <u>professional standards</u>. There are other circumstances that could lead to someone complaining about a doctor to the GMC, you'll find out more in their <u>Supporting You With Your Concerns</u> guide.

To raise a complaint with the GMC, complete their online form.

- You'll need to tell them:
- the doctor's name and work address
- the doctor's GMC reference number you'll find that on the GMC medical register
- what your concern is
- what happened and when
- copies of any supporting information for example letters of complaint

The GMC can't make your GP prescribe HRT or ask them to apologise. However, if they find that they need to take action against a doctor, they can issue a warning, ask them to agree to a plan of action, or take the matter to a tribunal.

#### **Care Quality Commission**

The Care Quality Commission (CQC) is the independent regulator of health and adult social care in England. You can't complain to them about your GP - complaints must go to the Practice Manager or the Integrated Care Board in the first instance. However, you can give them feedback about the care you've received (or not received). This information will help them in forming their judgements about the quality of care provided your GP practice. You can provide feedback on your care using the <u>CQC's online feedback form</u>.

#### Additional support when complaining

You're not alone in making a complaint about your healthcare, support is available.

*England:* The advocacy service in your local area will depend on who has the contract to do it. If in doubt, contact your local Integrated Care Board to ask them.

Advocacy People	<u>Healthwatch</u>
POhWER	<u>VoiceAbility</u>
Northern Ireland: Patient and Client Council (PCC)	
Scotland: Patient Advice and Support Service (PASS)	

Wales: Llais

### 5. Change GP practice

If your complaint to the practice manager had no impact, you might want to consider changing GP practice. We recognize that this is not always possible.

Trans Healthcare Intel have a map of <u>trans friendly GPs in England, Scotland and Wales</u> that you might find helpful. It might also be useful to ask around in any local trans support groups to see if there's a GP that others would recommend. In the absence of any local intel, you (or a supportive friend or family member) might wish to contact the GP practice you're hoping to move to, explain your situation and ask them to confirm that they'll be willing to prescribe your HRT.

If you're struggling to find a GP practice locally, it might be that you choose an online GP instead. If you choose this option, consider what implications this has for any health conditions that you're currently managing.

### 6. Tell TransActual

We've noticed that it seems to be becoming more common for GPs to refuse to prescribe trans people's HRT. That's why we've made this resource. We're also tracking the situation so that we can identify any patterns in relation to the reasons GPs are giving and parts of the UK that it's happening in.

You can help us do this by completing the GP refusal tracking form

TransActual CIC May 2024

www.transactual.org.uk

# Template letter to a practice manager

[Your full address] [And postcode]

[Date]

To the Practice Manager,

I'm writing to complain about Dr [GP name]'s refusal to prescribe me [name of medication].

My NHS number is [NHS number] and my date of birth is [Date of birth].

I attended an appointment on [date] at [practice name] and, when asked to prescribe my hormone replacement medication, Dr [GP name] told me that [he/she/they] is not willing to prescribe it to me. [He/She/They] stated that [insert reason here].

I am a [patient/former patient] of [insert name of Gender Clinic] and they first recommended I be prescribed [name of medication, dosage and frequency] on [date of your first letter asking a GP to prescribe]. I showed this letter to Dr [name] and yet was still refused a prescription.

The NHS Gender Clinics have a contract with the NHS which devolves the provision of prescriptions to Primary Care and, as such, I should expect that my GP will prescribe my HRT medication.

The HRT medications prescribed to trans people are the same as those prescribed to peri and post-menopausal women and to men with low testosterone. As a trans person, I'm protected under the under the Equality Act 2010 characteristic of gender reassignment. This means that I am entitled to access NHS care without being discriminated against.

#### If you've not previously been prescribed HRT, please delete this paragraph:

I have been prescribed HRT since [date of first HRT prescription]. Removal of access to this medication will mean that some of the changes I'd experienced to my body will be reversed. I'm particularly worried about [explain what changes you're worried about].

# If you've not had lower surgery that involved removal of your ovaries/testes, please delete this paragraph:

I had [insert name of surgery] in [month and year] and, as a result no longer have [ovaries/testes]. Losing access to HRT will cause me to experience peri-menopause and menopause, as well as putting me at the same increase health risks as a post-menopausal woman.

When Dr [name] refused to prescribe my HRT medication, it made me feel [talk about your own thoughts and feelings here. If it has impacted your mental health, please mention it here].

As a result of my compliant, I'd like:

- To be reassured that I will be given access to my [insert name of medication] medication.
- To be given a repeat prescription for [insert name of medication]
- [Insert anything else you'd like to happen].

I await your response and hope that it is resolved quickly. You can contact me at [insert email address and/or phone number].

Yours faithfully,

[Your first name and last name]

# Template letter to an Integrated Care Board, Health Board or Health and Care Board

[Your full address] [And postcode]

[Date]

To whom it may concern,

I'm writing to complain about the treatment I've received at [name of GP practice].

My NHS number is [NHS number] and my date of birth is [Date of birth].

I attended an appointment on [date] at [practice name] and, when asked to prescribe my hormone replacement medication, Dr [GP name] told me that [he/she/they] is not willing to prescribe it to me. [He/She/They] stated that [insert reason here].

I am a [patient/former patient] of [insert name of Gender Clinic] and they first recommended I be prescribed [name of medication, dosage and frequency] on [date of your first letter asking a GP to prescribe]. I showed this letter to Dr [name] and yet was still refused a prescription.

The NHS Gender Clinics have a contract with the NHS which devolves the provision of prescriptions to Primary Care and, as such, I should expect that my GP will prescribe my HRT medication.

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When Dr [name] refused to prescribe my HRT medication, it made me feel [talk about your own thoughts and feelings here. If it has impacted your mental health, please mention it here].

As a result of my compliant, I'd like you to contact [practice name] and ask them to:

- Reassure me that I will be given access to my [insert name of medication] medication.
- Provide a repeat prescription for [insert name of medication]
- [Insert anything else you'd like to happen].

I await your response and hope that it is resolved quickly. You can contact me at [insert email address and/or phone number].

Yours faithfully,

[Your first name and last name]