



8 December 2021

# Banning conversion therapy: NSS response

Submitted via email: [ctconsultation@cabinetoffice.gov.uk](mailto:ctconsultation@cabinetoffice.gov.uk)

## Questions about the respondent

A. Are you providing an individual or personal response or a response on behalf of an organisation?

Organisation

B. What is the name of your organisation?

National Secular Society

C. What type of organisation is it?

Other – Non-profit NGO.

The National Secular Society is a not-for-profit, non-governmental organisation founded in 1866, funded by its members and by donations. We advocate for separation of religion and state and promote secularism as the best means of creating a society in which people of all religions and none can live together fairly and cohesively. We seek a diverse society where all are free to practise their faith, change it, or to have no faith at all. We uphold the universality of individual human rights, which should never be overridden on the grounds of religion, tradition or culture.

D. Does your organisation work on behalf of any of the following people?

We work on behalf of all groups referenced, i.e., children, young people (16 years or over), LGBT people, people with religious beliefs and women. We advocate secularism as the best means of protecting the rights of all these groups and others.

E. Which country does your organisation work in?

We are based in England but work nationally and occasionally internationally.

F. Approximately how many people work in your organisation?

We currently employ six full-time members of staff and our council of management at present has twelve members. We are additionally supported by a number of volunteers.

## Views on banning conversion therapy

Do you agree or disagree that the Government should intervene to end conversion therapy in principle?

Why do you think this?

### **Strongly agree.**

We welcome the opportunity to respond to the government's consultation on banning conversion therapy, and strongly agree that the government should intervene to end conversion therapy in principle.

We advocate for a secular approach to healthcare, including in the field of mental health. Our work is intended to protect patients from harm caused by the imposition of religious values. We are opposed to religious influences in medicine where these adversely affect the manner in which medical practice is performed.

We note that all reputable medical and psychological experts agree that conversion therapy is ineffective, inherently homophobic, harmful and unethical. We therefore consider it appropriate for the state to work towards ending the practice.

## Consultation questions

Q1. To what extent do you support, or not support, the Government's proposal for addressing physical acts of conversion therapy? Why do you think this?

We consider physical acts of conversion therapy to be abhorrent and welcome that no act of physical violence done in the name of conversion therapy is legal in this country.

We think it is reasonable to legislate to ensure that where existing violent offences are motivated by conversion therapy, it may be considered as a potential aggravating factor by the judge upon sentencing.

Q2. The Government considers that delivering talking conversion therapy with the intention of changing a person's sexual orientation or changing them from being transgender or to being transgender either to someone who is under 18, or to someone who is 18 or over and who has not consented or lacks the capacity to do so should be considered a criminal offence. The consultation document describes proposals to introduce new criminal law that will capture this. How far do you agree or disagree with this?

**We strongly agree that talking conversion therapy for those who are under 18 should be considered a criminal offence.** We have repeatedly advocated that individuals under 18 should be protected by law from any form of conversion therapy. This is similar to laws passed in other countries, including Germany. We agree with the government that those under 18 years of age are more vulnerable and therefore are at higher risk of being harmed.

**However, we think there are still many points that require clarification regarding the proposed ban on conversion therapy on “someone who is 18 or over and who has not consented or lacks the capacity to do so”, i.e. “vulnerable adults”.**

#### ‘Consent’ and coercion

We agree that any attempt to compel or coerce an individual into activities aimed at changing their sexual orientation or gender identity should be prohibited.

Given the well-documented psychological harm of conversion therapy on already-vulnerable individuals, and the power imbalance between those undergoing conversion therapy and those giving it, any necessary balancing of rights should weigh heavily in favour of protecting those seeking or being subjected to harm.

We support the principle that adults with capacity should be allowed to make decisions that others may regard as unwise or dangerous such as choosing to try to change their sexual orientation despite the evidence that it doesn’t work and may be harmful. However, as we said in our letter to Liz Truss on 2 November, whilst we accept that it is possible for adults to consent to conversion therapy, it is clear to us that the idea of consent is problematic in circumstances where individuals have been raised in insular religious households or communities.

On the question of consent, the consultation document says an adult undergoing conversion therapy “must not be influenced by others”.

Every LGBT+ individual raised in a conservative religious community is under considerable influence by others regarding how they will view their own sexuality. Anti-LGBT+ attitudes are inescapable in such communities. It is hard to see how any individual raised in a conservative religious community will be able to give meaningful and informed consent for conversion therapy.

**We therefore need clarity on whether adults who have been raised in fundamentalist and insular religious communities with little exposure to other views and people from outside their community could be considered 'vulnerable' for the purposes of this offence.**

A similar question arises regarding coercion. LGBT+ people in religious communities may be motivated to seek conversion therapy through fear of going to ‘hell’ or other forms of divine punishment.

**We therefore need clarity on whether being raised in a community that suggests LGBT+ people will receive divine punishment will be considered a form of coercion.**

It is also unclear who the target is of the proposed law around coercion or control in a conversion therapy context. The proposals do not specify whether the person doing the coercing (e.g. a parent, religious leader etc) would be criminally liable, or the person performing the coerced conversion therapy, or both. It is essential that the law makes clear who would be guilty of the offence.

We also had concerns about following statement: “an adult who wants to be supported to be celibate will be free to do so”. Many forms of 'conversion therapy' amount to this, i.e. talking 'therapy' or prayers to 'support' a gay individual not to give in to their sexual desires, i.e. to remain celibate. The government should ensure that ‘support to remain celibate’ given to a gay person is considered a form of conversion therapy within the new law.

Finally, under the proposals it appears that an individual who consented to talking conversion therapy, but was subsequently harmed by such therapy, has no recourse in law for justice and/or compensation. Regardless of whether or not they consented to the therapy, victims who can

demonstrate they suffered physical or psychological harm by attempts to change their sexuality or gender identity should be able to seek compensation. There should be no religious exemptions.

‘Private prayer’

The proposals state that “private prayer” would not be considered a form of conversion therapy.

**We are concerned that because “private prayer” has not been defined, a loophole may be created whereby religious groups can continue to perform conversion therapy with impunity.**

For example, in 2018 a branch of the Pentecostal church Winners’ Chapel was filmed attempting to ‘cure’ an undercover reporter of his homosexuality via a “complete mind reorientation”<sup>1</sup>. The ‘cure’ involved prayer in a private setting which, while traumatic for the reporter, did not involve violence and would be unlikely to fall under the threshold of criminalised acts of physical conversion therapy set out in the proposals.

**We therefore seek clarity on whether the proposed ‘talking conversion therapy’ offence include those ‘therapies’ performed in a religious setting or using religious rituals, such as non-violent exorcisms, laying on of hands, group prayers etc., and whether it is the government’s view that this is something individuals can freely consent to.** A law that does not cover such practices is unlikely to capture most instances of conversion therapy taking place in the UK.

Impact on treatment of children experiencing gender dysphoria

We welcome the government’s intention to ensure that banning conversion therapy will not result in interference for professional psychologists, psychiatrists, psychotherapists, counsellors and other clinicians and healthcare staff providing legitimate support for those who may be questioning if they are LGBT. Careful consideration must be given to how any legislation will impact on medical practitioners’ efforts to treat gender dysphoria.

Q3. How far do you agree or disagree with the penalties being proposed?

We agree the proposed penalties are reasonable.

Q4. Do you think that these proposals miss anything? If yes, can you tell us what you think we have missed?

Please see our answer to Q2 regarding possible loopholes for religious conversion therapy in the proposals.

We have also identified the following areas where we believe the government could take further action:

a. Tackling anti-LGBT+ prejudice in schools and wider society

We think the best way to end conversion therapy is to end the demand, by working towards a society that treats LGBT+ people as equals and challenging those institutions, including religious institutions, that espouse homophobic views. We are therefore disappointed that the government has not made any proposals in the consultation to eliminate the anti-LGBT+ prejudice that fuels the demand for conversion therapy.

For example, there is a great need to improve LGBT-inclusive education in our schools. We are aware that there are some UK faith schools, including state-funded faith schools, that include stigmatising

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<sup>1</sup> <https://www.itv.com/news/2018-11-12/an-itv-news-undercover-investigation-exposes-the-uk-church-that-claims-you-dont-have-to-be-gay>

ideas about same-sex relationships in their policies. For example, we have found UK schools that say homosexuality is “intrinsically disordered”, and that same-sex relationships are morally wrong, in their relationships and sex education (RSE) policies<sup>2</sup>. No school, regardless of its ethos, should foster the idea that being gay is shameful, sinful or inferior to being heterosexual.

Similarly, some schools in the UK have been pressured by external religious groups to censor teachings about same-sex relationships<sup>3</sup>. All schools should be supported by the government to ensure they can teach about LGBT+ issues in an age-appropriate manner without fear of intimidation.

The government has also missed opportunities to crack down on charities that promote homophobic ideology; please see our answer to Q11 for further details.

b. Conversion therapy by healthcare professionals

**We believe the government should make it a criminal offence for any healthcare professionals, including psychotherapists, psychologist and psychiatrists, to practise, promote or make a referral for conversion therapy.** Under the current proposals, it would be legal for a healthcare professional to perform conversion therapy on a consenting adult.

We are disturbed by findings published in 2009 in BMC Psychiatry that over 200 accredited mental health professionals had offered some form of conversion therapy, with 35% of patients referred to them for treatment by GPs and 40% treated inside an NHS practice<sup>4</sup>.

Such referrals and “treatment” by medical professionals, even more so if within the NHS, are likely to be accepted by the individuals as being in their best interests and individuals may feel powerless to resist it. Those practitioners acting in this way are likely to be highly motivated, often by their faith, and prevention measures need to be robust.

The vast majority of medical professionals agree that conversion therapy is pseudoscience – and harmful pseudoscience at that. Like any other pseudoscience it has no place in medicine. Therefore, the law should protect individuals from being harmed by techniques practiced or promoted by an accredited ‘professional’, or someone else who claims the technique is grounded in science and medicine. Any accredited professional who practices, promotes or refers an individual for conversion therapy should lose that accreditation.

**The government must also take steps to improve education among health professionals about conversion therapy.** BMC Psychiatry’s survey revealed considerable ignorance about sexual orientation and confused medical ethics among mental health care professionals who had offered conversion therapy. Some believed same-sex sexual activity was inherently wrong or posed greater risks to health than opposite-sex sexual activity. Others thought that clients’ views of shame or distress caused by same-sex attraction should be addressed by attempting to ‘cure’ the same-sex attraction, rather than reassuring the client that same-sex attraction should not be a source of shame or distress. Others expressed the view that clients who came from religious or cultural backgrounds where homosexuality is taboo should be assisted in ‘curing’ feelings of same-sex attraction in order to fit the ideals and norms of that religion or culture.

All of these views are misguided and go against mainstream mental health ethics. Greater education

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<sup>2</sup> <https://www.secularism.org.uk/uploads/unsafe-sex-report-april-2018.pdf>

<sup>3</sup> <https://www.secularism.org.uk/news/2019/03/nss-government-must-support-schools-which-promote-lgbt-equality>

<sup>4</sup> <https://bmcp psychiatry.biomedcentral.com/articles/10.1186/1471-244X-9-11>

and awareness-building may be necessary throughout the field of mental health to ensure no practitioners bring such views into their work.

Q5. The Government considers that Ofcom’s Broadcasting Code already provides measures against the broadcast and promotion of conversion therapy. How far do you agree or disagree with this? Why do you think this?

We agree that Ofcom’s broadcasting code is likely to prevent the broadcast and promotion of conversion therapy.

Q7. The Government considers that the existing codes set out by the Advertising Standards Authority and the Committee of Advertising Practice already prohibits the advertisement of conversion therapy. How far do you agree or disagree with this?

We are somewhat concerned that some forms of advertising of conversion therapy may not be captured by ASA or CAP. For example, leaflets distributed in public places or delivered to homes may not be captured (see our answer to Q8).

Q8. Do you know of any examples of advertisements that you consider to be endorsing or promoting conversion therapy? If yes, can you tell us what these examples are?

There have been recent reports of conversion therapy being advertised on Facebook in Arabic, despite Facebook banning such adverts in English<sup>5</sup>. It is therefore probable that such advertising may exist in other languages and on other social media platforms.

Aside from online advertising, while we are unaware of any recent advertisements for conversion therapy in the UK, we are aware of some religious charities using what we consider to be unethical and misleading methods to advertise spiritual ‘cures’.

For example, the registered charity Universal Church of the Kingdom of God (UCKG) sells “holy oil”, which it has claimed can be used for “the sick”, “the emotionally distressed” and “things that represent difficulties”. It promotes the holy oil through a publication designed to look like a newspaper posted through people’s letterboxes and left on buses. The document is filled with testimonies about people whose medical conditions and wellbeing improved thanks to the holy oil<sup>6</sup>. When we reported this to ASA and the Fundraising Regulator, neither were able to take action.

It is possible that advertising for conversion therapy could be distributed in a similar fashion beyond the reach of ASA, CAP and the Fundraising Regulator.

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<sup>5</sup> <https://www.openlynews.com/i/?id=dca4275c-275a-4ede-baec-08074c4f262f>

<sup>6</sup> <https://www.secularism.org.uk/opinion/2020/04/charities-cant-sell-snake-oil-or-can-they>

Q11. Charity trustees are the people who are responsible for governing a charity and directing how it is managed and run. The consultation document describes proposals whereby anyone found guilty of carrying out conversion therapy will have the case against them for being disqualified from serving as a trustee at any charity strengthened. To what extent do you agree or disagree with this approach? Why do you think this?

**We strongly agree with the proposal to ensure that charities do not support conversion therapy.** This is an issue we have repeatedly raised with both the government and Charity Commission. **However, we are concerned that the proposals are not robust enough in this respect and will do little to address the issue of charities supporting conversion therapy.**

We agree with the proposals that anyone found guilty of carrying out conversion therapy will have the case against them for being disqualified from serving as a trustee at any charity strengthened.

However, it appears that under the proposals, charities that either perform or promote legal (i.e. 'consensual') forms of talking conversion therapy will still be able to retain registered charitable status, including the tax benefits this status provides.

An example demonstrating how difficult it is for the Charity Commission to deny registration to charities promoting conversion therapy, or the underlying homophobic ideologies that fuel conversion therapy, is the case of the charity Living Out. Although Living Out has said it does not support conversion therapy, an article on Living Out's website suggests the organisation regards same-sex relationships and desiring sexual encounters with someone of the same sex as sinful<sup>7</sup>. It therefore seeks to help "Christian brothers and sisters who experience same-sex attraction stay faithful to biblical teaching on sexual ethics"<sup>8</sup>. In other words, the organisation exists to encourage gay people to practice celibacy.

In 2015, the Charity Commission rejected a registration application from Living Out, on the basis that it was not serving a public benefit and because it "was not evidenced that the organisation sought to promote the wider Christian religion rather than the specific doctrines with regard to homosexuality."<sup>9</sup>

Living Out sought a review, and in 2016 the Charity Commission reversed its decision and accepted Living Out on to the register<sup>10</sup>. Critics of this decision included Conservative MP Michael Freer who expressed surprise that "the Charity Commission could remotely believe this to be of public benefit". He said: "This is gay cure therapy rebranded."<sup>11</sup>

But the commission said it was now satisfied that Living Out "was a more broadly-focused organisation, interested in promoting acceptance, love, compassion and a welcoming place in the Christian Church for same-sex attracted individuals who wish to stay true to their Christian faith"<sup>12</sup>.

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<sup>7</sup> <https://www.livingout.org/resources/articles/29/the-christian-debate-over-sexual-identity-orientation-and-labelling>

<sup>8</sup> <https://register-of-charities.charitycommission.gov.uk/charity-search/-/charity-details/5058286/charity-overview>

<sup>9</sup> <https://www.civilsociety.co.uk/news/charity-commission-registers-organisation-that-encourages-gay-christians-to-remain-celibate.html>

<sup>10</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/501454/Living\\_Out\\_full\\_decision.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/501454/Living_Out_full_decision.pdf)

<sup>11</sup> <https://www.thirdsector.co.uk/mike-freer-mp-criticises-decision-register-living-charity/governance/article/1384237>

<sup>12</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/501454/Living\\_Out\\_full\\_decision.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/501454/Living_Out_full_decision.pdf)

This highlights one of the main roots of the problem. Every charity that we know has promoted or performed gay conversion therapy, or the idea that even to think sexual thoughts about people of the same sex is wicked, is registered under the charitable purpose of “The advancement of religion”.

We believe charities promoting conversion therapy and other homophobic ideologies are able to do so because they are advancing a religious doctrine. We believe a charity that was not registered under this purpose would be unable to promote these forms of homophobia in this manner.

Furthermore, changes in charity law should mean that charities registered under ‘the advancement of religion’ must demonstrate that they serve a public benefit. However, our research has indicated there is very little evidence to suggest the vast majority of religious charities have truly been subjected to the ‘public benefit test’<sup>13</sup>. The proliferation of religious charities promoting conversion therapy and other often extreme forms of homophobia is further evidence of this.

For reference, we have included a list of charities found to be promoting or performing conversion therapy, or promoting anti-LGBT+ religious ideologies, in the Appendix.

Another example of the problems faced by charity regulators in tackling conversion therapy in the charity sector is the case of Core Issues Trust. This charity is registered in Northern Ireland so it would not fall within the jurisdiction of the proposed laws, but its case serves to demonstrate issues that the Charity Commission for England and Wales could also face.

Core Issues Trust advocates what it calls “change orientated therapies” for people “who want to move away from homosexual feelings, behaviours and attractions”. The trust says the therapies it promotes “support client goals to prioritise conservative religious values over their same-sex attractions in identity development”.

The trust is registered with the Charity Commission for Northern Ireland under the charitable purposes to advance religion and advance education. Under its objects of association, it encourages “lifestyle choices consistent with Christian living” and upholds the view that sexual relationships outside heterosexual marriage are “inconsistent” with the Bible.

In 2020 the NSS wrote to the Charity Commission for Northern Ireland to urge it to review Core Issues Trust's status as a registered charity. The commission’s reply said it is “not the role of the commission to adopt a position on the charity's conduct in this matter”. It noted that the Core Issues Trust presents its therapy as “beneficial” and “contests the view that this practice is inherently harmful”.

It said that the charity's trustees have “demonstrated a regard for” guidance on providing a public benefit, and that charitable purposes must be “beneficial, not harmful”. But it added: “We note that the practice of conversion therapy / change orientated therapy is not among the purposes of the charity.”

The commission’s response appeared to suggest it was not the commission's role to take a position on such therapy while it is legal.

We think neither conversion therapy nor the promotion of homophobic ideology, such as the idea that same-sex relationships are morally wrong, can ever serve a public benefit. On the contrary, both are harmful to individuals and society.

Therefore, it is not sufficient for the government to only penalise those charities and trustees involved with illegal forms of conversion therapy.

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<sup>13</sup> [https://www.secularism.org.uk/uploads/nss-advancement-of-religion-charity-report-\(electronic\).pdf](https://www.secularism.org.uk/uploads/nss-advancement-of-religion-charity-report-(electronic).pdf)



We also think removing “the advancement of religion” as a charitable purpose would help ensure harmful religious organisations cannot attain charitable status; religious organisations that do provide a genuine public benefit can easily register under a different charitable purpose. More information about this can be found in our 2019 report on religious charities:

<https://www.secularism.org.uk/charities/charity-report.html>

It should be noted that charities do not make a profit in a commercial sense, but money may still change hands between conversion therapy providers and their victims in the form of a ‘donation’ or ‘expenses’. We are concerned that the proposals to ensure nobody can profit from conversion therapy may not capture these scenarios.

Finally, we are very disturbed by reports that the UK government is among major aid donors to have funded clinics in Uganda, Kenya and Tanzania that offer conversion therapies<sup>14</sup>. This must cease immediately and more scrutiny must be given to the destination of international aid to ensure it does not fund conversion therapy.

**We make three recommendations to strengthen the government’s proposals to ensure the charity sector does not support conversion therapy:**

1. The government must also ensure those organisations that perform, promote or otherwise support legal, ‘consensual’ forms of conversion therapy, are prevented from becoming registered charities, and that registered charities found to support conversion therapy are appropriately sanctioned by the Charity Commission, which may include deregistration.
2. The government must ensure any organisations that actively promote homophobic ideology are prevented from becoming registered charities, and that registered charities found to promote homophobia are appropriately sanctioned by the Charity Commission, which may include deregistration.
3. The government must review the charitable purpose of ‘the advancement of religion’ and its role in enabling charities to promote conversion therapy and other forms of anti-LGBT+ hate.

Q12. To what extent do you agree or disagree that the following organisations are providing adequate action against people who might already be carrying out conversion therapy? (Police; Crown Prosecution Service; OTHER statutory service)? Why do you think this?

We think the Charity Commission for England & Wales may require greater powers to tackle charities that promote conversion therapy and other forms of anti-LGBT+ ideology. Please see our answer to Q11 for more details.

## Economic appraisal

Q15. Do you have any evidence on the economic or financial costs or benefits of any of the proposals set out in the consultation? If yes, please can you provide us with details of this evidence, including where possible, any references to publications?

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<sup>14</sup> <https://www.theguardian.com/global-development/2021/jul/02/major-aid-donors-found-to-have-funded-conversion-therapy-clinics-in-africa>

Charities supporting conversion therapy and other forms of homophobia (see Appendix for examples and incomes) benefit from public funds in the forms of exemptions from income tax, corporation tax, capital gains tax and stamp duty. They also pay no more than 20% of normal business rates on the buildings they use. Additionally, under the Gift Aid Scheme, charities can claim from HMRC an additional 25% of any donation made by a UK tax-payer, and UK companies can donate to charity before any tax is deducted. Finally, donations made to charities by a bequest in a will are free of inheritance tax.

Preventing charities that promote conversion therapy and homophobia from registering would redirect money currently funding harmful practices and ideologies back into the public purse.

A significant proportion of victims of conversion therapy have subsequently required psychological treatment and other healthcare<sup>15</sup>. Eliminating conversion therapy from society would therefore reduce the burden on the NHS to treat those harmed by the practice.

## Equalities impacts appraisal

Q16. There is a duty on public authorities to consider or think about how their policies or decisions affect people who are protected under the Equality Act 2010. Do you have any evidence of the equalities impacts of any proposals set out in the consultation?

Steps taken to eliminate conversion therapy from society would especially benefit those on the basis of the protected characteristics of gender reassignment and sexual orientation.

Steps that adequately tackle conversion therapy in religious settings would additionally protect those under the protected characteristic of religion or belief. A law that granted religious exemptions for conversion therapy would arguably be detrimental to those sharing particular religions, as they would not receive the same protection in law as those who do not share that religion.

## Questions related to privacy

Q17. Would you like your response to be treated as confidential?

No

Q18. What is your email address? If you enter your email address then you will automatically receive an acknowledgement email when you submit your response.

Megan.manson@secularism.org.

**Please see overleaf for appendix.**

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<sup>15</sup> [https://drive.google.com/file/d/1NpGW3PtZTnT21O4PbwuD\\_rkvk6aG99iv/view](https://drive.google.com/file/d/1NpGW3PtZTnT21O4PbwuD_rkvk6aG99iv/view)

Appendix – examples of charities registered in England that have performed or promoted conversion therapy, or promoted or signposted anti-LGBT+ hate

**Charity name:** Bolton Central Islamic Society

**Charity number:** 1041569

**Year registered:** 1994

**Income:** £320,927

**Summary:** In 2019 this charity's website was found to link to external sites that say gay people should be executed.<sup>16</sup>

**Charity name:** Christadelphian Advancement Trust

**Charity number:** 1080393

**Year registered:** 2000

**Income:** £77,062

**Summary:** In 2019, NSS reported this charity to the Charity Commission for content on its website equating homosexuality with bestiality, disease, masochism and Nazism: "The life of sexual impurity is an "ever increasing" downwards path; the endless quest for new relationships and sexual novelty doesn't need to be described. It is significant that having "left the natural use of the woman"(Rom. 1:27), male homosexuals descend on an "ever increasing" path of perversion; they rarely remain where they are, in moral terms. At least two independent surveys of gay men found that around 20% admitted having sex with animals, compared to 3% of heterosexual man (2). The majority of homosexuals have literally thousands of encounters over a lifetime (hence the rapid spread of disease between them), with very few developing stable relationships (3). There is also well documented connection between homosexuality and masochism. The top six male serial killers in the US were all gay; as were many Nazi concentration camp operators."<sup>17</sup>

**Charity name:** Christadelphian Bible Mission

**Charity number:** 1020558

**Year registered:** 1993

**Income:** £1,012,481

**Summary:** The NSS found this charity's website equated gay people with rapists and child abusers: "From lack of discipline has come corruption, immorality, violence, drug and alcohol abuse, hijacking, kidnapping, theft, child abuse, homosexuality, rape and murder."<sup>18</sup>

**Charity name:** The Christadelphian Sunday School Union

**Charity number:** 1097921

**Year registered:** 2003

**Income:** £14,321

**Summary:** This charity is a Sunday school for children. The contents of their website reflect what they teach children. Their website says: "Homosexual practices are clearly condemned (Leviticus 18:22; 20:13; Romans 1:27; 1 Corinthians 6:9-10). Discuss the challenges, and the importance, of staying loyal to Bible teaching when many people view homosexual practices as normal, and homosexual relationships as of equal merit as heterosexual ones."<sup>19</sup>

**Charity name:** Church of God in Romford

**Charity number:** 1188545

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<sup>16</sup><https://www.secularism.org.uk/news/2019/04/nss-refers-islamic-charities-promoting-extremism-to-regulator>

<sup>17</sup><https://www.secularism.org.uk/news/2019/11/christadelphian-charities-condoning-violence-and-promoting-misogyny>

<sup>18</sup><https://www.secularism.org.uk/news/2019/11/christadelphian-charities-condoning-violence-and-promoting-misogyny>

<sup>19</sup><https://www.secularism.org.uk/news/2019/11/christadelphian-charities-condoning-violence-and-promoting-misogyny>

Year registered: 2020

Income: £32,084

**Summary:** This is the most recently-registered branch of an evangelical church. Its website says those who practice “homosexual activity” can “have no part in God's Kingdom” and that it is the duty of church members to support those who come out as gay in “what will have to be for them a celibate lifestyle, at least as far as relationships with the same sex are concerned”.

In discussing AIDS, it contrasts those who have been infected “quite innocently (e.g. when receiving health-care)” with those who are infected as a “consequence” of “non-biblical sexual practices”.<sup>20</sup>

**Charity name:** **The Faith Movement**

**Charity number:** 1188137

**Year registered:** 2020

**Income:** This charity has been recently registered - it does not need to update its information until 10 months after its first financial period ends.

**Summary:** An editorial on the charity's website says that the “correct response” to any young person who comes out as gay is to say “No, you are not 'gay', what you are is a human being created by God”. It says homosexual “temptations” result from “a confusion of the affective and the erotic faculties” that “may be deeply rooted in neurosis”. According to the writer, such urges “must be faced with humility and overcome with the tried and tested formula of prayer, self mastery through grace and, most crucially, with the help of chaste and supportive friendship”.<sup>21</sup>

Another blog on the website compared the arguments of those who support equal civil rights for LGBT+ people with “those of slaveholders and those involved in the slave trade”. It said “reparative therapy” (another term for the harmful practice of 'gay conversion therapy') is an “option” for gay people, and homosexuality “seems to result from fragmentations within the child/father/mother relationship”. This content has since been removed from the website.

**Charity name:** **Ghamidi Centre of Islamic Communication**

**Charity number:** 1192764

**Year registered:** 2020

**Income:** This charity has been recently registered (14 December 2020) - it does not need to update its information until 10 months after its first financial period ends

**Summary:** In 2021, soon after the charity was registered, the NSS found a lecture published on the Ghamidi Centre's website entitled “Is there room for gays and lesbian (sic) in Islam?”. During the lecture Islamic scholar Khalid Zaheer said homosexuality “cannot be allowed” because “there are people who lose their senses and are inclined to killing others” and that “we're not going to allow killing because of the reason that there is somebody who has a problem in his mind or is mentally ill”. He said homosexuality “needs to be stopped, it needs to be curbed” and if there are “people who are suffering from diseases which are causing them to be inclined to do things which are illegitimate, we need to cure such patients”.<sup>22</sup>

**Charity name:** **IslamBradford**

**Charity number:** 1154340

**Year registered:** 2013

**Income:** £117,924

**Summary:** This charity's website was found in 2019 to host a link to a website that said men who have sex with other men are “to be executed” and calls homosexuality “a great and abhorrent evil”.

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<sup>20</sup> <https://churchesofgod.info/article-homosexuality-an-alternative-lifestyle/>

<sup>21</sup> <https://www.faith.org.uk/article/november-december-2003-the-debate-about-homosexuality>

<sup>22</sup> <https://www.secularism.org.uk/news/2021/01/new-islamic-charitys-website-says-same-sex-attraction-is-a-disease>

It said punishments for homosexuals include being “burned with fire”, “thrown down from a high place” and “stoned to death”.<sup>23</sup>

**Charity name:** Islamic Network

**Charity number:** 1101603

**Year registered:** 2004

**Income:** £65,422

**Summary:** Despite an intervention by the Charity Commission after they posted material legitimising the murder of homosexuals<sup>24</sup>, the charity continues to provide a platform for extremists according to the Henry Jackson Society.<sup>25</sup>

**Charity name:** Journey UK

**Charity number:** 1056150

**Year registered:** 1996

**Income:** £77,874

**Summary:** Journey UK offer courses that draw on “insights of psychology and child development” in “areas of struggle in relationships and sexual addictions.” They follow “an orthodox Christian understanding of sexuality, including God’s plan for sexual relations between a man and a woman within marriage”.<sup>26</sup>

**Charity name:** Living Out

**Charity number:** 1165572

**Year registered:** 2016

**Income:** £56,487

**Summary:** An article on Living Out’s website suggests the organisation regards same-sex relationships and desiring sexual encounters with someone of the same sex, as sinful<sup>27</sup>. It therefore seeks to help “Christian brothers and sisters who experience same-sex attraction stay faithful to biblical teaching on sexual ethics”<sup>28</sup>. In other words, the organisation exists to encourage gay people to practice abstinence.

In 2015, the Charity Commission rejected an application from Living Out to the charity register, on the basis that it was not serving a public benefit and because it “was not evidenced that the organisation sought to promote the wider Christian religion rather than the specific doctrines with regard to homosexuality.”<sup>29</sup>

Living Out sought a review, and in 2016 the Charity Commission reversed its decision and accepted Living Out on to the register<sup>30</sup>. Critics of this decision included Conservative MP Michael Freer who expressed surprise that “the Charity Commission could remotely believe this to be of public benefit”.<sup>31</sup>

But the commission said it was now satisfied that Living Out “was a more broadly-focused organisation, interested in promoting acceptance, love, compassion and a welcoming place in the Christian Church for same-sex attracted individuals who wish to stay true to their Christian faith”.<sup>32</sup>

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<sup>23</sup><https://www.secularism.org.uk/news/2019/04/nss-refers-islamic-charities-promoting-extremism-to-regulator>

<sup>24</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/446278/islamic\\_network.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/446278/islamic_network.pdf)

<sup>25</sup> <http://henryjacksonsociety.org/wp-content/uploads/2018/02/HJS-Islamist-Charity-Report.pdf>

<sup>26</sup> <https://www.journey-uk.org/faqs/>

<sup>27</sup> <https://www.livingout.org/resources/articles/29/the-christian-debate-over-sexual-identity-orientation-and-labelling>

<sup>28</sup> <https://register-of-charities.charitycommission.gov.uk/charity-search/-/charity-details/5058286/charity-overview>

<sup>29</sup> <https://www.civilsociety.co.uk/news/charity-commission-registers-organisation-that-encourages-gay-christians-to-remain-celibate.html>

<sup>30</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/501454/Living\\_Out\\_full\\_decision.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/501454/Living_Out_full_decision.pdf)

<sup>31</sup> <https://www.thirdsector.co.uk/mike-freer-mp-criticises-decision-register-living-charity/governance/article/1384237>

<sup>32</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/501454/Living\\_Out\\_full\\_decision.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/501454/Living_Out_full_decision.pdf)

**Charity name: Mountain of Fire and Miracles Ministries International**

**Charity number:** 1100416

**Year registered:** 2003

**Income:** £4,582,825

**Summary:** Mountain of Fire and Miracles (MFM)'s founder Daniel Olukoya preaches that gay people are possessed by "the spirit of the dog" and believes that prayer can save those "in the bondage of homosexuality".<sup>33</sup> An undercover investigation in the Liverpool Echo in 2018 revealed that an MFM church was putting these teachings into action through an extreme form of 'gay conversion therapy' involving starvation.<sup>34</sup>

**Charity name: The Slough Islamic Trust**

**Charity number:** 254759

**Year registered:** 1968

**Income:** £385,664

**Summary:** The NSS found links on the charity's website to content that encouraged hatred of gay people, including statements such as "Homosexuality becoming wide-spread among people is the harbinger of sociological problems and asocial earthquake" and "Today, with dark propaganda spread through television, movies and the Internet, homosexuality is knocking on the door of Muslims around the world".<sup>35</sup>

**Charity name: True Freedom Trust**

**Charity number:** 1159015

**Year registered:** 2014

**Income:** £130,685

**Summary:** This charity states that its mission is to "promote a biblical pattern for gender and sexual relationships."<sup>36</sup> It offers a referral service "for those who struggle with same-sex temptations and gender confusion"<sup>37</sup> to counsellors "who are sympathetic to our Basis"<sup>38</sup>. It takes the view that same-sex relationships are "sexual immorality"<sup>39</sup>.

**Charity name: World Mission Agency - Winners Chapel International**

**Charity number:** 1134421

**Year registered:** 2010

**Income:** £10,397,172

**Summary:** In November 2018, undercover work by ITV News obtained video evidence of a pastor at the Dartford branch of Winners Chapel offering "complete mind reorientation" for gay people. The pastor stated that messages about gay acceptance in society were "carefully scripted" by Satan, and compared it with Nazi propaganda. The process was described by the reporter as follows:

"I went through hours of counselling and prayer sessions, all directed at ridding me of my homosexuality. Sometimes the prayers in themselves seemed harmless, such as for God to direct me and guide me. I felt it changed from something that could have been comforting to something sinister and potentially traumatising...There was little sensitivity about how this could have been incredibly damaging to me".<sup>40</sup>

<sup>33</sup> <https://www.thetimes.co.uk/article/amazon-supports-mountain-of-fire-and-miracles-ministries-church-that-backs-gay-conversion-snczllxt0>

<sup>34</sup> <https://www.liverpoolecho.co.uk/news/liverpool-news/echo-goes-undercover-gay-cure-13468107>

<sup>35</sup> <https://www.secularism.org.uk/news/2019/06/islamic-charities-push-death-for-apostates-and-female-subjugation>

<sup>36</sup> <https://truefreedomtrust.co.uk/beliefs>

<sup>37</sup> <https://truefreedomtrust.co.uk/about-us>

<sup>38</sup> <https://secure.truefreedomtrust.co.uk/content/what-does-ftthink-reparative-therapy>

<sup>39</sup> <https://truefreedomtrust.co.uk/what-does-bible-teach-about-same-sex-practice>

<sup>40</sup> <https://www.itv.com/news/2018-11-12/an-itv-news-undercover-investigation-exposes-the-uk-church-that-claims-you-dont-have-to-be-gay>

Charity name: **York Christadelphian Ecclesia**

Charity number: 1185342

Year registered: 2019

Income: £2,424

Summary: This charity is the most recently-registered of six different charities that list ThisIsYourBible.com as their official website on the Charity Commission's register. The others are: Amersham Christadelphian Ecclesia (1167789), Bradford Christadelphians (1176497), Erith Christadelphian Ecclesia Charitable Incorporated Organisation (1170080), Morpeth Christadelphian Ecclesia (1075016), and Teignmouth Christadelphian Ecclesia (1169123).

In 2019, the NSS referred all six of these charities to the Charity Commission after finding the following statement on its website:

“As part of the rebellion of our society against God’s rules, homosexuality (sex between members of the same sex) has been declared ‘normal’, and now open same-sex relationships have become common, and even supported by law. Homosexuality is clearly condemned in the Bible. The Law of Moses said, ‘If a man lies with a male as he lies with a woman, both of them have committed an abomination. They shall surely be put to death’ (Leviticus 20 v13).”<sup>41</sup>

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<sup>41</sup> <https://www.secularism.org.uk/news/2019/11/christadelphian-charities-condoning-violence-and-promoting-misogyny>