



MINISTERS' CONSULTATION RESPONSE

Dear Secretary of State

Over 2500 Christian Ministers and Pastoral Workers write to The Rt Hon Elizabeth Truss, MP, Secretary of State for Foreign, Commonwealth and Development Affairs and Minister for Women and Equalities, in response to the Consultation on “Banning Conversion Therapy”

Dear Secretary of State

We are Christian ministers and pastoral workers from a broad range of churches, who have in common that we hold to orthodox, historic Christian teaching on sexual ethics. We are writing in response to the consultation on ‘Banning “Conversion Therapy”’ presented by you to Parliament on 29th October 2021.

In our churches we welcome and show love to many people who have different experience and views, including same-sex attraction and forms of gender transition. We always seek to act in love, with gentleness and respect, for the good of all, and never with any form of coercion or control.

We are grateful to the government for having made clear in the consultation that it does not intend this legislation to impact the normal practice of religion. Nevertheless, we are deeply concerned that the legislative approach outlined would do exactly this. We see in these proposals a clear possibility that our duty as ministers, of proclaiming the Lordship of Jesus Christ, and calling people to find life in him, which includes living by his laws, will be criminalised. We also believe it could be used against Christian parents who could equally be criminalised for loving advice and teaching given to their own children.

The category of ‘Conversion Therapy’ is one which is so broad as to be essentially meaningless. It has the effect of implying an equivalence between calling people to conversion to Christ, which is our duty as Christian ministers, and evil and disreputable past practices which are already illegal and which Christians are the first to condemn. Legislating against such a bizarrely broad category is clearly not viable and strongly risks criminalising us as we fulfil our compassionate duties as Christian ministers and pastors. This would be a clear breach of our legal right to manifest our religion.

Christianity has always held that God created humanity with the lifelong marriage of one man and one woman as a gracious gift to humanity and a central part of his design for human society. To violate that pattern, by sexual activity outside marriage or denial of our created sex, is sin. As such it is not only morally wrong but carries with it deep and tragic consequences for individuals, families and society. It is a central part of our calling to bring Christ’s compassion to a broken world, that we call people to live according to God’s gift and pattern of marriage and offer them pastoral support to help them do so. This has nothing to do with therapy; it has everything to do with what it means to be a Christian.

To urge and assist people to live in this way, far from being harmful, is a kind and merciful act, and of benefit to all. What is plainly and terribly harmful is when anyone, especially the young, believes that their identity is found purely in their feelings and that happiness is to be found in misusing and harming their healthy bodies. Yet the proposals would apparently criminalise us for seeking to care for people and seeking to dissuade them from this kind of harm.

Furthermore, it is our duty to call people to be converted to Christ; that is, to turn from believing that we are identified and best guided by self, to knowing that we are identified and best guided by God. Christian Conversion inevitably means giving up on lifestyles incompatible with being a Christian, of which sexual sins are just one. It should not be a criminal offence for us as Christian ministers to persuade, to teach and to help people of every age to become, and to live as, orthodox Christians. It should not be a criminal offence for us to instruct our children that God made them male and female, in his image, and has reserved sex for the marriage of one man and one woman. Yet this seems to be the likely outcome of the proposed legislation.

We therefore very much hope (and pray) that these proposals will be dropped in their current form. We have no desire to become criminals, and place a high value on submitting to and supporting our government. Yet we think it important you are aware that if it were to come about that the loving, compassionate exercise of orthodox Christian ministry, including the teaching of the Christian understanding of sex and marriage, is effectively made a criminal offence, we would with deep sadness continue to do our duty to God in this matter.

Nevertheless, we are confident that this outcome is not what your department intends by these proposals, and for that we are most grateful. However, this will require the adoption of an entirely different approach.

We write to you as faithful subjects of Her Majesty the Queen, Defender of the Faith, in the hope that this will assist her Majesty's government to avoid unwittingly legislating against the very faith of which she has been appointed defender. We add this to the prayers that we constantly make for the government's essential and God-given task of ruling our nation.

Yours faithfully,

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The full list of all **2546 signatories** of this letter can be seen on [pages 12 - 63](#).

A detailed theological background & analysis of the consultation can be read on [pages 4 - 11](#).

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Theological Background and Analysis of the Consultation

This is provided by the authors of the letter, to give the background to and the reasons behind the letter. It explains why we as Christian ministers and pastoral workers who hold to the historic, orthodox understanding of marriage are deeply concerned about the possible impact of the proposed legislation.

This represents the thinking of the authors. Other signatories of the letter may not agree with everything here.

A Confusion of Categories

1. Conversion is a core and central part of many Christians' experience of God, and is a theological concept of considerable importance. While this is particularly prominent in Protestant and Evangelical traditions, it is present in all streams of Christian thought, describing the essential turn from the self and one's own desires to God and his commands and love which is inherent in Christian faith. Calling people to Conversion to Christ is a central part of the calling of Christian ministers.
2. We therefore view the use of the title 'Conversion Therapy' as the definition of what is to be banned as both bizarre and troubling. Conversion, being a work of God, cannot be brought about by any kind of therapy. The phrase 'Conversion Therapy' seems to carry the implication that Christians are particularly associated with the disreputable, cruel and thoroughly unchristian practices of some quack therapies in the past. For some, at least, who are calling for a ban, this implication seems deliberate.
3. The consultation itself provides an example of this. Question I 'about respondents' experiences of conversion therapy' reads:

“A wide range of acts can be committed in the name of conversion therapy. This includes anything from acts of physical violence e.g. assault and rape, to talking interventions and therapies.”

We suggest that a category which includes both a parent gently encouraging a son or daughter to accept and like the body he or she was born with, and also the monstrous crime of rape, is not a category with any conceivable usefulness. Moreover, the use of this category in legislation seems to make it all but inevitable that loving parents, pastors and others will be seen as being guilty of something horrific.

4. If there is firm evidence of a real and current problem with coercive and abusive therapies, not covered by existing law, we have no problem with legislating against them. But we see no reason at all why the Christian concept of ‘conversion’ should be associated with them. Doing so can only fuel confusion and increase the likelihood that the law will be misused against Christian ministers and churches merely doing their normal work. If this is not the intention, there is every reason not to use the word ‘conversion’ in any legislation, and we urge and request that this should be the case. Far clearer and more accurate, and less open to misunderstanding and misuse, would be to call the things the government wishes to ban ‘coercive therapies’ or ‘abusive therapies.’

Marriage and the duty of Christian ministers

5. Christianity is concerned for the welfare of all. We are driven by the mercy that God has shown us in Christ to seek to show compassion to those in need, to serve those around us, and to teach and train people in how to live in a manner which is the very best for them and for those around them. God has placed unique resources in his church to enable this to happen.
6. What anyone believes to be good for people, and what conversely they consider harmful, depends on their understanding of what it means to be human. Christianity has deep and ancient foundations for its understanding of these matters, which have been constant features of Christian belief from the time of Christ onwards. First, that to be human is to be an image of God, designed by him to reflect his nature. Second, that being the image of God inevitably involves being male and female; all humans are created by God as one or the other, and this is a fact which we cannot change and must accept and live by. And third, that God made mankind male and female with the purpose of them being united as one flesh in marriage, which is designed by God as the means of procreation and nurture of the next generation.
7. Marriage, which means exclusively the lifelong, oath-bound union of the lives and bodies of one man and one woman, is an integral part of God’s design for human nature. It is modelled on the relationship between Jesus Christ himself and his church, and is a means by which God blesses all people both through its natural good results and because it points to the way in which we can know and love God ourselves through the sacrificial love of Jesus Christ. We could not deny the moral imperative of submitting sexually to God’s gift and pattern of marriage without denying our worship of Jesus Christ, the church’s bridegroom, nor our identity as the Christian church, as Jesus’ bride.

8. Marriage, defined in this way, is therefore the non-negotiable touchstone of Christian sexual ethics. Its goodness extends far beyond the happiness of husband and wife. It provides the stable context for the rearing of children by their own parents. It secures loving relationships between generations and families. It provides the structure needed for a stable society. It protects women from abuse and obliges men to act responsibly, in love not selfishness. It requires that children are not conceived where there is not a loving commitment from both parents to their love, nurture and care. While it achieves none of these things perfectly, where marriage is honoured and marriage vows are taken seriously it has a dramatic effect for good. Christian morality has therefore always required that sexual union and pleasure is confined within the bounds of marriage. All other sexual liaisons, encounters and relationships are to be denied.
9. Living by, teaching and helping people to follow God's pattern of marriage is a supremely compassionate thing to do. It can never be harmful to people to live according to human nature as God designed it; conversely, great harm arises from following our internal desires when they are contrary to the design, and the commands, of God. It is good to deny our feelings when, as they so often do for all of us, they would lead us to do this.
10. This is part of the overarching Christian ethical principle that we are to deny our own selves for the good of others. Thus both faithful marriage, and chaste singleness, are honoured ways of life for Christians. Therefore denying, not pursuing, our natural desires, is often the key to right ordering of human desires and a right understanding of human identity.
11. Human identity, being founded on the image of God, includes whether we were created male or female, and whether we are married or single. Morally acceptable sexual behaviour for Christians depends on these things alone. For Christians, subjective feelings and attractions neither establish any other identity nor justify breaking God's pattern of marriage.
12. Conversion to Christ, which is integral to Christian faith, means turning from self as the source of meaning and morality to God as the source of both. Thus anyone who becomes a Christian is required, among other things, to accept and submit to God's commandments.
13. God's pattern of marriage is therefore binding upon all who are Christians or who wish to become Christians. Teaching God's gift of marriage, urging people to follow it, and pastorally supporting them as they try to do so is an essential part of the task of a Christian minister. To fail to do this would be a dereliction of our sacred duty to God.
14. For the avoidance of doubt, since this is part of the unchangeable law of God, there are no circumstances in which we would change our opinion on this or cease to carry out our pastoral duty in this matter. This includes any scenario in which it was attempted to impose such a change by force of law. We will in this matter happily obey God even if doing so is criminalised.

Our Concerns

15. Our principal concern is that the proposed legislation carries a very high risk of criminalising the teaching and pastoral support of people to live according to the Christian pattern of marriage. Thus our work as Christian ministers, and other Christian pastoral workers, would be made illegal. We do not believe that this is the government's intention, but the legislation as proposed would be likely to have this effect.
16. We note with gratitude the intention that it 'will not impact everyday religious practice... simply expressing the teachings of a religion will not constitute conversion therapy'. Yet it is not clear how this is compatible with the descriptions of 'Talking Conversion Therapy' provided in paras. 34-39. Specifically, it is not clear how our preaching, teaching and pastoral work will not be criminalised.
17. The proposals are lacking in clear definition of what is meant by 'conversion therapy'. But they demonstrate both an ignorance of basic Christian teaching and an uncritical acceptance of highly contested aspects of Queer theory. For example, para 52 states that 'conversion therapy... targets an innate aspect of personhood'. However, that a specific sexual orientation or gender identity is an innate aspect of personhood is not even agreed upon among pro-LGBT thinkers, and is strongly denied by many others, including but certainly not limited to Christians.
18. In Christian theology personhood is grounded in the image of God our creator, which is expressed in our created maleness or femaleness. The subjective feelings associated with the modern concepts of 'sexual orientation' or 'gender identity' are, in orthodox Christian understanding of human nature, neither innate nor part of our personhood.
19. This is particularly clear in the matter of transgender identity. The government is, we hope, aware that even the existence of 'gender identity' as something independent of biological sex is extremely controversial. Many secular thinkers deny its existence as much as Christians do. It is of very recent invention and it does not exist in UK law. Yet the proposals treat a 'transgender identity' as something absolute which it would be illegal to seek to change. Thus it is proposed to criminalise seeking to change something which does not currently legally exist. In doing so, it would set serious legal precedents, such as establishing 'being transgender' as a recognised reality for some children.
20. It seems therefore that the proposals seek to establish in criminal law acceptance of and conformity to one particular, esoteric and highly controversial philosophy of human nature. Orthodox Christians are far from the only ones who disagree with this.

We will now set out how Christians disagree, and would fall foul of the proposals.

- 21. We start with the ministerial forward, in which the Secretary of State says that ‘it is ... vitally important that... young people are supported in exploring their identity without being encouraged towards one particular path’. The problem here is that it is our God-given duty precisely to encourage people of every age, including the young, towards one particular path, namely, to conformity with the Christian pattern of marriage, as we have set out above.**
- 22. This is particularly clear in the matter of ‘transgender identity’. Christians cannot ever endorse the denial of our created sex, nor the physical harm inflicted upon a healthy body which is involved in ‘gender transitioning’. We will always, as is our duty, encourage everyone of every age away from loathing and harming their healthy bodies, and instead to acceptance of and gratitude to God for them.**
- 23. Thus the approach from the outset seems to assume that orthodox Christian ministry is unacceptable.**

Next we consider the ‘Talking Conversion Therapy’ descriptions offered in paras. 34–39.

- 24. It is proposed in paragraph 52 that the offence will operate on two tests: 1) coercion or control, 2) motivation of conversion therapy. The existing coercive controlling behaviour offence will be expanded. We fail to see how the proposed modification to the coercive controlling behaviour offence proposed in para. 53 can work in practice or even have legal or logical coherence. To expand the existing offence ‘to be regardless of repetition or the nature of the relationship between the perpetrator and victim’, such that a single comment by a stranger on one occasion could be considered coercion, surely evacuates the concept of coercion of any meaning. Such a law would be wide open to abuse, with any statement made by anyone with which the hearer disagrees being potentially classed as coercion. In practice, this would mean that a normal, orthodox Christian sermon, pastoral guidance, or even an isolated comment could be deemed to have met this test.**

25. This leaves the question of what counts as ‘conversion therapy’, such that someone might be judged to be motivated by it, as the second test. Here there are further serious problems with the proposals.
26. Para. 36 states that ‘talking conversion therapies will have the intention of changing a person’s sexual orientation or changing them to or from being transgender’. Christians, as we hope is clear, do not define people in these terms. We do not believe we have any ‘therapy’ to offer which would change people in this way, nor do we approve of the attempt. Yet those who are converted to Christ will renounce both the denial of their created sex and homosexual behaviour, for these contravene God’s command to live according to the pattern of marriage. The confusion created by the term ‘conversion therapy’ means that we fear our quite legitimate call to people to live in a Christian way will be judged as if we were guilty of this intention.
27. Para. 37 states that ‘Legitimate talking therapies that support a person who is questioning if they are LGBT do not start from the basis that being LGBT is a defect or deficiency’. We do not consider that there is a particular defect or deficiency those who identify as LGBT have which others do not. We do, however, consider breaking God’s commandments, in denying our created sex or engaging in sexual relations outside of the faithful marriage of one man and one woman, to be sin. Moreover, the internal desires to commit sexual sin, that is, to break the pattern of marriage, which are all but universal for human beings and of which LGBT inclinations are only one form, are certainly defects and deficiencies. The whole of human nature is defective and deficient according to the Christian doctrine of original sin. We consider all sexual sins, including but not limited to those associated with LGBT lifestyles, to be sinful, and Christians are called by God to turn away from them. Therefore, again, we are likely to be judged to be guilty of this.
28. Para. 38 seeks to extend this from those who seek to change identity to those who seek to remedy or control feelings of same-sex attraction or being transgender. Yet it is a central aim of Christian pastoral ministry to encourage and enable people not to act upon their feelings, including sexual attraction, when those feelings would lead them into sin. For example, we would often offer spiritual help to people to deal with their inclinations towards adultery or use of pornography. Exactly the same would be true with all other temptations to depart from the Christian understanding of marriage, including same-sex sexual acts and denial of one’s created sex.
29. Of particular concern is the statement in para. 39 that this would apply to all instances involving people under 18. There is no age group more in need of learning of God’s design of marriage for humanity, or which suffers more from not understanding its fundamental place in true human identity and in a fulfilled and healthy adult life, than children. Training our young people in the faith is not only protected by human rights legislation but is, again, part of our duty as Christian ministers.

30. We consider the current transgender phenomenon to be exceptionally damaging to young people, many of whom through a combination of popular culture, peer pressure and social media influence are led to believe that in some mysterious sense they do not belong to their biological sex. We now regularly encounter young people in our work who are considering causing irreversible damage to their bodies, including puberty blockers, hormonal treatment and genital mutilation, because they believe themselves to be transgender. We have no shame at all in saying that we will do all that is in our power to encourage young people away from the hatred of one's own natural, God-given body which is involved in transgenderism, and to help them to accept and live according to the sex which God has made them, and to love and care for the body which God has given them. Christian ethics, here as elsewhere, recognises and reinforces biological reality.
31. It is ironic and bizarre that the government seems to consider that under 18s are capable of consenting to the drastic, lifelong and physically damaging medication and procedures involved in gender transitioning but incapable of consenting to talk about whether to pursue such procedures with those who might seek to dissuade them. Even more ironically, in para 69 a parallel is drawn with Female Genital Mutilation. We feel the need to remind the government that transgender surgery **is** Genital Mutilation. We view Genital Mutilation as an appalling crime. Yet the proposals would criminalise us if we were to seek to dissuade a person under 18 from consenting to such treatment or starting a path towards it.
32. This is obviously directly applicable to the work of Christian ministers and pastoral workers. It is also relevant to Christian parents who could equally be criminalised by the legislation as proposed in loving advice and teaching given to their own children.
33. We therefore cannot see how, despite the assurances of para. 25, both normal Christian parenting and normal Christian pastoral ministry of children and teenagers would not constitute 'conversion therapy' under the proposed descriptions, and therefore be criminalised. For we do, and will continue to, teach our young people, both in formal group settings and in pastoral care settings, in our churches and our families, of the goodness of and the need to live by the Christian pattern of marriage.
34. We are further alarmed that, given that the descriptions of 'Conversion Therapy' proposed seem to include orthodox Christian ministry, para 86 states that 'The Government is keen to strengthen the likelihood that individuals and charities carrying out conversion therapy are either disqualified from being a trustee or senior leader in a charity where appropriate, or a charity is required to cease illegal practices, and... removed from the register.' The effect would be ministers in orthodox Christian churches being disqualified from acting as trustees of their own churches, and orthodox Christian churches being threatened with the loss of charitable status unless they abandon orthodox Christian teaching on marriage.

Conclusions

35. The legislation as proposed would risk making it a criminal offence to teach or pastorally support people in following the teachings of orthodox Christianity on sexual ethics, which requires that we accept that our sex is God-given and not changeable, and that we live either in the faithful marriage of one man and one woman or else in sexual abstinence. We believe that this is not the intention of the government, but that would not prevent the law being interpreted as such.

36. This is plainly unacceptable to us whose God-given task is the preaching and teaching of Christianity and the pastoral support of those who wish to live by it. Moreover, it is very much our duty to teach the under-18s of the church the goodness and privilege of living according to the Christian understanding of marriage. Our duties in these things are given us by Jesus Christ and we will not cease them under any circumstances.

37. The government needs therefore to recognise that the legislation as proposed would quite possibly have the effect of making orthodox Christianity a proscribed religion. We are grateful again that the proposals state that this is not the intention. If this is genuinely meant, however, a very different legislative approach will be required. On the other hand, if orthodox Christian ministry is to be made illegal, we would prefer it if this were explicitly stated. It goes without saying that this would not induce us to cease to preach the gospel of Christ or pastor people according to his gracious and good laws.

Dear Secretary of State

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