

Conversion Therapy Helpline is 'state-sanctioned surveillance'

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First Published by Christian Concern: March 11th, 2022

Carys Moseley, policy researcher for Christian Concern, comments on why the government's proposal for a 'conversion therapy victims helpline' is problematic.

The UK government has advertised a contract to set up a Conversion Therapy Victims Helpline¹. Work on setting up the helpline is due to start on 25 March this year. The project is set to run before a bill to ban conversion therapy is tabled in Parliament, and until 24 March 2024. This gives plenty of time for the government to bring a bill before the next general election, should it be delayed for some reason.

New funding for victims of 'conversion therapy'² was promised by Liz Truss, Minister for Women and Equalities, in May 2021. The government stated in its recent consultation for England and Wales that it was considering setting up a helpline³ (Section 6.6).

What the helpline will do

Here is how the helpline is described in the advert. I provide an analysis of the comments in bold below.

*"The Authority requires the development, set-up and operation of a helpline and website that **will direct clients to relevant, existing services and provide initial pastoral support to individuals who have gone through, are going through, or are at risk of conversion therapy practices.** The helpline and website will be collectively known as the Conversion Therapy Victim Support Service. The service will be required to direct clients to existing support and to provide information and, when necessary, direct support to vulnerable persons, whilst the website will be expected to **provide public information and resources on the topic of conversion therapy.***

*"That the service required provides guidance and signposting to relevant services that users may require, such as counselling, **options for making a report to the police, and other public services such as emergency housing.** The service should also*

*provide **support to professionals who may be concerned about an instance of conversion therapy** and are seeking support on what action to take."*

Only one kind of support allowed

Directing clients to "relevant, existing services" includes LGBT-affirmative counsellors affiliated to the mental health professional bodies.

"Provide initial pastoral support" refers to signposting people of faith to pro-LGBT religious organisations and pastors. Presumably all else is deemed 'un-pastoral' and unsupportive. The reason we can say this is that 'pastoral support' is precisely what Christian opponents of the ban said we wanted to protect. The government has turned this rhetoric round for its own ends.

'Risk of conversion therapy'

What is meant by helping those "at risk of conversion therapy"? Given the widespread concerns about the lack of a clear definition, and the way in which it has been stretched, this is a serious problem. Given that the government proposes a criminal ban, such help amounts to allowing members of the public to put others under suspicion by reporting a 'risk of conversion therapy'.

Helpline will lead to Conversion Therapy Protection Orders

Whilst the advert says the helpline will help individuals who are 'at risk', the government proposed also to allow certain categories of people to obtain Conversion Therapy Protection Orders for those 'at risk'. This means that the helpline advert only tells half the story. To get a protection order, someone would have to go to court.

This is what the government said in Section 6.2 of the recent consultation:

*"In line with FGM Protection Orders, the government will ensure that the following groups could apply to a court for a Conversion Therapy Protection Order:
– the person who has had or is at risk*

*of conversion therapy
– a local authority
– any other person with the permission
of the court for example, the police, a
teacher, a charity, a friend or a family
member”*

The fact that the person ‘who has had or is at risk’ can apply for a Protection Order suggests that whoever is a ‘victim’ of ‘conversion therapy’ is somewhat self-defined. This makes the whole process comparable to what happens with the recording of hate crimes.

Churches at risk of being reported

It should be obvious that churches are at risk of being reported to the helpline. This is because the freedom to make decisions and organise churches along Biblically-based sexual ethics is undermined by the ban proposals.

In response to widespread concerns, the government has only stated that people will be free to express religious teaching. It has not stated that they will be free to organise churches according to it. Likewise, it has not upheld parents’ right to organise their children’s lives in accordance with Christian teaching.

How reliable will ‘public information’ be?

The other interesting thing about the helpline is its timing. In November last year, the evidence supporting the government’s ban proposal was disproven⁴. Yet the helpline advert subsequently went live on 22 December. It looks as if the Government Equalities Office did not take heed of the new evidence, which was peer-reviewed scientific evidence.

In light of this, the public information and resources deemed suitable for provision are bound to be biased resources and studies alleging harm. We can assume this because this kind of publication is what the government used in the consultation.

Will the helpline be linked to the police?

The helpline will include ‘options for making a report to the police’. This suggests that whilst the helpline itself will not link to the police, its staff may be able to help callers send a report of ‘conversion therapy’ to the police.

Emergency housing available

The helpline will help provide guidance for callers to access emergency housing in local authorities, for those deemed ‘at risk’. Emergency housing is something the Ban Conversion Therapy Coalition asked for in its consultation response⁵. In reality this comes from the claim advanced by various charities that LGBT youth are more likely to be homeless.

Children at risk

Related to this, the Ban Conversion Therapy Coalition also recommended children’s risk assessments to be written using existing legislation, therefore circumventing the need for a new law. It is proposed that risk assessments to enable children to be removed from homes where they are at risk of ‘conversion therapy’ be conducted under the Children Act 1989. Clearly the helpline would be accessible to children, as well as those claiming to act on their behalf, in this respect.

What this means is that a door is now opened to parents quarrelling over the upbringing of their own children. One parent could report the other for ‘conversion therapy’ (or ‘conversion practices’) if he or she insists that a son does not dress up as a girl to school, for example. This is far from being an unsubstantiated fear. In Canada a father was jailed⁶ in March last year for ‘misgendering’ his daughter.

Enabling professionals to spy on each other

The helpline will support professionals concerned about instances of conversion therapy. This probably relates to those listed who can ask the courts to give a Conversion Therapy Protection Order. These include teachers, social workers, charities, etc.

In reality, this likely means that some professionals will be enabled to spy on their colleagues and report them to the police.

The helpline is linked to the consultation

The advert for the helpline contract on the UK government website links the contract to the conversion therapy consultation email address⁷ at the Government Equalities Office. This begs the question as to why.

The helpline advert page also has a link to information about who is handling the consultation responses. This task has been contracted out to a private management

company. Its managing director was at the Cabinet Office⁸, heading up the PM's Strategy Unit and Delivery Unit.

The helpline will be UK-wide

The consultation did welcome responses for Scotland and Northern Ireland as well, and said the Government Equalities Office would share such responses with the Scottish and Northern Irish governments:

"In the development of our approach we have liaised closely with the devolved administrations. Our approach is for England and Wales only, however, we welcome responses to this consultation from the whole of the UK and will share these with the respective administrations." (Introduction to CT consultation⁹)

In light of this, it is unsurprising that the advert for the helpline contract does not limit the work to England and Wales, even though the recent consultation only dealt with a proposed criminal ban there. There are two versions of this advert: the one on Contract Finder¹⁰ and

one on Bidstats¹¹. This document on BidMatcher¹² says explicitly that it covers Scotland and Northern Ireland. This means that the risk of being reported both to the helpline and the police potentially exists across the UK.

State-sanctioned surveillance and the new pre-crime scenario

Given that the helpline is being set up before a law is even passed, the fact that it could facilitate reports to the police is concerning. Will this be like reporting non-crime hate incidents¹³ to the police? The ability to tell the helpline of 'risks of conversion therapy' is clearly highly intolerant, and really involves state-sanctioned surveillance of 'perpetrators of conversion therapy'. This is exactly what the Ozanne Foundation recommended¹⁴ back in October.

In reality, the helpline goes further – it allows callers to anticipate who might be guilty. Anybody who speaks positively about the possibility or reality of change away from same-sex attraction and gender confusion is potentially at risk. Welcome to the new world of guilt by accusation.

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- ¹ <https://www.contractsfinder.service.gov.uk/Notice/216e5492-0680-43b7-a469-2a81f20ae4be>
- ² <https://www.gov.uk/government/news/government-sets-out-plan-to-ban-conversion-therapy>
- ³ <https://www.gov.uk/government/consultations/banning-conversion-therapy/banning-conversion-therapy>
- ⁴ <https://christianconcern.com/ccpressreleases/international-experts-and-ex-gays-speak-out-against-government-conversion-therapy-ban/>
- ⁵ <https://static1.squarespace.com/static/5efc4344362f4379c92231da/t/61f3c7ad01ec3a3230abc171/1643366318088/BCT+Coalition+Response+to+Consultation+FINAL.pdf>
- ⁶ <https://christianconcern.com/comment/canadian-father-jailed-for-misgendering-his-daughter/>
- ⁷ <https://www.find-tender.service.gov.uk/Notice/004083-2022>
- ⁸ <https://www.almaeconomics.com/nick>
- ⁹ <https://www.gov.uk/government/consultations/banning-conversion-therapy/banning-conversion-therapy>
- ¹⁰ <https://www.contractsfinder.service.gov.uk/Notice/216e5492-0680-43b7-a469-2a81f20ae4be>
- ¹¹ <https://bidstats.uk/tenders/2021/W51/765329536>
- ¹² <https://www.bidmatcher.uk/c/uk/crown-commercial-ser-conversion-therapy-victim-support-serv-0a9a62e1>
- ¹³ <https://christianconcern.com/comment/court-of-appeal-rules-police-guidance-on-hate-incidents-must-change/>
- ¹⁴ <https://christianconcern.com/comment/ozanne-foundation-wants-state-surveillance-of-christian-ministries/>