



**RESPONSE OF THE COUNCIL OF PUBLIC AFFAIRS OF THE PRESBYTERIAN CHURCH IN IRELAND TO
THE PUBLIC CONSULTATION ON THE PROPOSED PRIVATE MEMBERS' BILL ON BANNING
CONVERSION THERAPY PRACTICES**

MARCH 2025

Background

1. The Presbyterian Church in Ireland (PCI) has over 190,000 members belonging to over 500 congregations across 19 Presbyteries throughout Ireland, north and south. The Council for Public Affairs is authorised by the General Assembly of the Presbyterian Church in Ireland to speak on behalf of PCI on matters of public policy.
2. People in Northern Ireland, whatever their sexual orientation, should be able to live free from coercive practices designed to change their orientation, imposed upon them against their will. Coercive interventions with a view to changing an individual's sexual orientation against their will are wrong and, where current legislation does not adequately deal with these coercive practices, then it would be appropriate to consider introducing new laws.
3. PCI is of the strong opinion that existing laws are sufficient to deal with genuine cases of abuse or coercion, and that demands for a new specific law are motivated by activism that wants a broad 'speech crime' law to catch the everyday activities of church leaders and parents who do not affirm LGBTQ ideology. Legal reviews often reveal, however, that objectionable practices that activists say they wish to ban, are in fact, already illegal. Serious consideration ought to be given as to how individuals reporting genuine abuse can be better protected under existing law. The common theme is that what constitutes 'conversion therapy practices' is very difficult to define legally and risks criminalising innocent behaviour like praying or having a conversation.
4. In seeking to promote the dignity, autonomy and well-being of all, there should be freedom for any individual to seek support to live in accordance with their conscience, including where that is shaped and formed by their personal understanding of faith orthodoxy and holy texts. For many individuals within our society this is the Christian faith and the Bible, which offer an understanding of the context of human relationships within a framework intended to facilitate the flourishing of all in society. We further recognise within a pluralist society has multiplicity of beliefs and faith traditions, including 'no-faith', and affirm the rights of every person to live in accordance with their beliefs. An outworking of this for those who are same-sex attracted and wish to live faithfully in the context of a biblical understanding of human relationships, is to abstain from sexual activity. Such a person may wish to receive pastoral care and support as they seek to live in this way. Without clarity around definitions there is a chance that an

unintended consequence of a legislative ban on conversion therapy practices might constitute unreasonable government interference in reasonable religious practices.

5. PCI offers the following comments and observations in response to MLA Eoin Tennyson's proposed legislative change banning conversion therapy practices, through a Private Members' Bill on behalf of the Alliance Party.

Defining Conversion Therapy Practices

6. The consultation document does not offer a clear and precise legal definition of what is meant by the term "conversion therapy practices" yet it goes on to set out new criminal and civil measures to end "conversion therapy practices". This is wholly unacceptable. PCI also feels very strongly that the term "conversion therapy practices" is hugely unhelpful as it is a vague, ill-defined term which is open to misunderstanding and misinterpretation.
7. There is currently no internationally accepted definition of 'conversion' or 'reparative' therapies. It would appear, though, that the working definition of the term 'conversion therapy practices' used in this consultation document is taken from the LGBTQI+ Strategy Expert Advisory Panel which defines 'conversion therapy practices' as 'techniques intended to change or suppress someone's sexual orientation or gender identity' noting that this can take many forms, 'ranging from pseudo-psychological treatments, aversion therapies, as well as practices that are religious based (such as 'healing prayer' or deliverance ministry.)'
8. Additionally, the report states that the term 'conversion therapy practices' encompasses all medical, psychiatric, psychological, religious, cultural and any other interventions that seek to erase, repress, or change an individual's sexual orientation.
9. PCI is gravely concerned that these definitions fail to take account of, or make provision for, individuals who actively and honestly seek pastoral support and prayer from their minister/pastor. Legislative proposals, which would prevent a minister/pastor, or other leader in a faith context, fulfilling their pastoral duties responsibly and well, ought to be rejected. Thresholds to prove coercion must be rigorous to prevent against spurious allegations, and the creation of a chilling effect for any Christian involved in pastoral care and discipleship.
10. As indicated earlier PCI is clear that coercive interventions with a view to changing an individual's sexual orientation against their will are wrong. Abusive and violent acts, including the use of drug treatments to limit and/or reverse sexual desire, or 'aversion therapies' such as electric shock (all of which have been sanctioned in state-run institutions in the past) are abhorrent. Provisions to tighten the law to ensure such practices are appropriately addressed through, for example, the proposal to introduce motivation by conversion therapy as a potential aggravating factor by a judge on sentencing, should be supported.

11. The Presbyterian Church in Ireland's concerns were summed up by the Rev Daniel Kane, convener of PCI's Council for Public Affairs, in a speech accepted by the 2024 General Assembly when he stated that any new law on conversion therapy practices, 'should not criminalise ministers, church workers and parents.' Mr Kane further explained, *'there is a grave risk of future legislation straying into the freedoms we have of proclaiming the uniqueness of Christ and freedom to practice our faith. The term conversion therapy continues to be a wide, ill-defined, umbrella term, covering all kinds of abusive practices which are largely already illegal.'* Concluding he stated that, *'any future legislation shouldn't criminalise ministers, church workers and parents as they walk beside those who struggle with their sexuality, pastorally and prayerfully.'*
12. These remarks affirmed the position of the PCI in 2021, when the Very Rev Dr David Bruce, then Moderator of the General Assembly, opposed a similar motion brought before the NI Assembly saying, *'Conversion therapy is an unhelpful term which is defined differently by different people.'* He explained: *"Attempts to end same sex attraction by using drug treatments to limit and/or reverse sexual desire, or 'aversion therapies' such as electric shock treatment, (all of which have been sanctioned in state-run institutions in decades past), are utterly and entirely wrong."* In conclusion he said, *"any forthcoming legislation regarding 'Conversion Therapy', Article 9 of the European Convention on Human Rights needs to be carefully considered, as it provides for freedom of thought, conscience and the practice and observance of religion... Legislation which prevents a minister or other leader fulfilling their pastoral duties responsibly and well, ought to be rejected."*
13. There is also a need for any proposed new Bill to have legal safeguards to protect freedom of religion and freedom of speech. It is essential that any new Bill must not criminalise expressions of personal conviction (especially if they are made without expressions of hatred or intolerance, or improper purpose or coercion, or abuse of power.) We are deeply concerned that an unintended consequence of the adoption of a broad definition could result in the undermining of free speech and gospel freedom. It would be an absurdity if under new legislation banning conversion therapy practices a heterosexual person seeking prayer and guidance on their sexuality or sexual practice could receive them from their minister/pastor/priest and a homosexual person seeking the same could be leading that minister/pastor/priest into committing a prosecutable offence. A Bill that could also be used to criminalise any minister/pastor/priest teaching or communicating within the confines of a church building what is simply a mainstream Christian sex ethic would not be acceptable.

Use of a Private Members Bill

14. At PCI we are concerned at the choice of a PMB to drive such significant legislative change. We urge the Bill sponsor to allow the Minister for Communities to bring forward an Executive Bill on an effective ban on conversion therapy practices before the end of the current Assembly mandate, per the Motion tabled on the 4th June 2024.
15. Should the Bill sponsor continue with the course of action, PCI seeks reassurance that this Bill undertakes the same robust scrutiny that would be afforded to an Executive Bill; this

should include a consultation from the relevant committee and scrutiny of the committee processes.

A handwritten signature in black ink, appearing to read 'Daniel Kane', with a stylized, somewhat abstract flourish at the end.

Rev Daniel Kane (Convenor of the
Council of Council of Public Affairs)

A handwritten signature in black ink, appearing to read 'Rebecca Stevenson', written in a cursive, flowing style.

Dr Rebecca Stevenson
(Public Affairs Officer)