

Response to call for input to a thematic report: gender, sexual orientation and gender identity

[United Nations Independent Expert on protection against violence and discrimination based on sexual orientation and gender identity]

From

The International Federation for Therapeutic and Counselling Choice (IFTCC)

11th March 2021

Introduction

About Us

The International Federation for Therapeutic and Counselling Choice (IFTCC) was registered in the United Kingdom (England and Wales), in 2017¹. Launched in October 2018², the IFTCC emerged after a small group of individuals and organisations from Europe and the USA worked collaboratively to create an entity that would represent the rights and freedoms of persons formerly LGBT, and those who support them. Its website³ provides information in Hungarian, German, Italian, Slovak, Korean, Mandarin, Arabic, Ukrainian, Russian, French, Spanish and English. Annual events⁴ held in English have typically attracted interest from up to 25 nations, with formal simultaneous translation in a small number of the above languages.

The IFTCC was established to help those no longer LGBT identified to find the support they are looking for by providing access to “preferred provider” counsellors. These are counsellors who uphold the practice guidelines⁵ and ethical statements⁶ of the IFTCC, and who are sympathetic to the goals and worldviews of those seeking help⁷. They value client autonomy. Although not a religious organisation, the IFTCC Mission Statement⁸ finds the best science upholds Judeo-Christian values with respect to human sexuality, marriage and the human body. The organisation exists to oppose rising intolerance against those who formerly identified as LGBT:

Due to the historically poor standards of care some people have received in this area, and the increasingly intolerant attitudes towards people who seek to turn from homosexuality and gender confusion, the International Federation for Therapeutic and Counselling Choice (IFTCC) was set up to offer people high-quality, professional and discreet support to enable them to follow their life-choices⁹.

The IFTCC continues to make representations directly, or through its associated organisations, as invited by the United Nations (UN)¹⁰, at the Organisation for Security and Co-operation in Europe (OSCE)¹¹ and to various world governments^{12,13} from different world areas¹⁴. The Organisation has transparently laid out its concerns in the document entitled: Serious Harmful Implications of Therapy Bans (2020)¹⁵. The 2019 IFTCC Conference produced a multiple language declaration and subsequent online events have re-enforced these values¹⁶.

Note on the framing of the Call for Input

¹ <https://find-and-update.company-information.service.gov.uk/company/10910877>

² <https://iftcc.org/events/iftcc-launch/>

³ <https://iftcc.org>

⁴ https://youtu.be/qoitN_0SBqM

⁵ <https://iftcc.org/standards/>

⁶ <https://d3uxejw946d7m5.cloudfront.net/wp-content/uploads/2018/08/About-the-IFTCC-English.pdf?x88743>

⁷ <https://www.xoutloud.com/the-uk-heroes/>

⁸ <https://iftcc.org/about/>

⁹ Ibid

¹⁰ <https://d3uxejw946d7m5.cloudfront.net/wp-content/uploads/2019/12/IFTCC-to-UN-HRC-individual-Submission-to-Victor-Madrigal-FINAL-2019-12-21.pdf?x88743>

¹¹ https://www.osce.org/files/f/documents/a/b/394403_0.pdf

¹² https://d3uxejw946d7m5.cloudfront.net/wp-content/uploads/2020/05/IFTCC_Statement_on_Legislative_Proposal_of_the_German_Bundestag_4-5-20_English.pdf?x88743

¹³ https://d3uxejw946d7m5.cloudfront.net/wp-content/uploads/2020/11/IFTCC_Letter_to_Canadian_MPs_2020-11-18.pdf?x88743x88743

¹⁴ https://www.osce.org/files/f/documents/0/4/432356_0.pdf

¹⁵ <https://d3uxejw946d7m5.cloudfront.net/wp-content/uploads/2020/01/Serious-Harmful-Implications-of-Therapy-Ban-Bills.pdf?x88743>

¹⁶ https://d3uxejw946d7m5.cloudfront.net/wp-content/uploads/2019/11/IFTCC_Postconference_Statement_2019_English.pdf?x88743

Relevant parties are requested to submit information to Victor Madrigal-Borloz, Independent Expert on protection against violence and discrimination based on sexual orientation and gender identity, (hereafter UN Independent Expert on SOGI) with the intention of informing his report. He requests (point 10) information, as one of 12 areas of interest, asking “Who are the main actors who argue that the defenders of human rights of LGBT individuals are furthering a so-called “gender ideology”?” because critique of Gender Theory is of concern. Information is requested on those successfully resist(ing) “attacks” on gender ‘ideology’ (sic). Of concern, of course, is the danger of advocacy overshadowing scientific research and debate and of advocacy interests trumping objective reading of science.

Ideological diversity versus silos of intolerance

Advocacy Science risks pushing any analysis into confirmation bias because ideological diversity has been disallowed. ‘Advocacy Science’ differs from ‘inquiry’ models or investigation because the investigation is being undertaken to promote a specific agenda, viewpoint or policy. A definition of ‘confirmation bias’ reminds us that researchers value results more highly when they match their own moral and political belief systems, and disregard those which don’t. As Haidt¹⁷ (2013:90) has noted:

each individual reasoner is really good at one thing: finding evidence to support the position he or she already holds, usually for intuitive reasons. This is why it’s so important to have intellectual and ideological diversity within any group or institution whose goal is to find truth (such as an intelligence agency or a community of scientists) or to produce good public policy (such as a legislature or advisor board).

‘Confirmation bias’ in turn leads to viewpoint discrimination. Where ideological monocultures are unchallenged, diversity cannot properly exist and equality ceases. That various areas of discourse appear to be unchallengeable and above critical analysis in the Call for Response¹⁸ are indicative of increased siloing that can only lead to discrimination. UN aspirational goals such as Gender Ideology (Queer Theory), Sustainable Development and Comprehensive Sexuality Education are named in this document in the context of embedded International Law as though they are received orthodoxy, and beyond critical intervention. This is despite the fact that the UN member states have not included “gender identity” in any binding international agreements. In fact, attempts to do this have been rigorously opposed. Related to this is the indissoluble link entrenched in the document between violence and discrimination based on sexual orientation and gender identity and dissenting, or views critical of Gender Theory. Opposition to, or critique of gender theory cannot be defined as “violence” or “discrimination”. We call on the independent expert to value cultural and ideological diversity as a means of challenging silos, reducing intolerance, building consensus and encouraging equality. We believe the emphasis should be protecting sex-based rights, not LGBT ideology.

Our Response to the Call for Input into the Thematic Report

The IFTCC recognises the opportunity to provide perspective, examples and commentary with respect to how states collect data, provide definitions, relate to treaties, declarations, programs and policies relevant to the Call for Input. We will also comment on the use of narrative with reference to sexual orientations, with special reference to the UK since that is where we operate and are registered. Through our IFTCC country representatives, it may be possible to provide wider information that is country-specific if that would be of interest. In what follows, we will confine our comments in this paper to the following four main areas, with which we have had direct experience through our own organisation:

1. Main mechanism for challenging resistance to LGBT ascendancy in the UK
The *defacto* ban on Therapeutic Choice:
 - 1.1 Consensus Statement on Conversion Therapy and the
 - 1.2 Memorandum of Understanding on Conversion Therapy and
 - 1.3 Professional Standards Authority (PSA)
 - 1.4 Role of the Government Equality Office
2. Observations about the gathering and use data to promote LGBT acceptance in the UK.
 - 2.1 The National LGBT Survey and
 - 2.2 The 2018 LGBT Action Plan

¹⁷ Haidt, Jonathan, 2013. *The Righteous Mind. Why Good People are Divided by Politics and Religion*. Penguin; 1st edition

¹⁸ <https://www.ohchr.org/EN/Issues/SexualOrientationGender/Pages/GenderTheory.aspx>

3. Non-governmental initiatives to challenging resistance to LGBT ascendancy in the context of The Faith and Sexuality Survey (FSS) and the role of legacy media, social media and the banking sector.
 - 3.1 Legacy media
 - 3.2 Social Media
 - 3.3 Banking Sector
4. Summary and Conclusion

1. Main mechanism for challenging resistance to LGBT ascendancy in the UK:

The *defacto* ban on Therapeutic Choice, the Consensus Statement on Conversion Therapy and the Memorandum of Understanding on Conversion Therapy.

1.1. The Consensus Statement on Conversion Therapy - Background and context

When in February 2014 the Consensus Statement on Conversion Therapy (CSCT)¹⁹ was published in the UK, Core Issues Trust²⁰ noted:

It is very noticeable that in the three main paragraphs of the statement set out below, the controlling principle is expressed not in scientific terms, but in terms of what “we believe”. Of course, when so many august bodies express such beliefs in unison, the general public is bound to be impressed. But the scientific community should protest that science is based not on what we believe, but on what we can demonstrate in practice.

Herein lies the chief objection to LGBT ascendancy promoted on the grounds of science. The plain fact is, no substantial science is evident in this document. This important document promotes an ideological aspiration. When in November 2015 the Memorandum of Understanding on Conversion Therapy²¹ (MOU 2017 Version 2)²² was released, the weak scientific basis of the statement was again apparent²³:

The Memorandum of Understanding (2014) purports to ensure inter alia that “The public are well informed about the evidence (of harm) and risks of conversion therapy”. In support of this intention however, the document provides no such evidence, merely citing literature reviews such as Serovich (2008) et al and the APA Task Force (2009) neither of which provides replicable, longitudinal, or conclusive evidence that therapeutic interventions for unwanted same-sex attractions are harmful. Once again, the APA’s warning that “there is little in the way of credible evidence whether SOCE does or does not work” to substantiate such claims of effectiveness or otherwise, has been ignored. The document also cites the UKCP Consensus Statement which misleadingly appeals to the absence of ‘gold standard’ randomised controlled trials to assess talking therapies - knowing that such trials using a placebo to study sexual orientation change efforts (SOCEs) are both unethical and unachievable. Such trials have never been undertaken, not even to disprove the effectiveness of such interventions.

1.2. The Memorandum of Understanding on Conversion Therapy: the main mechanism for challenging resistance to LGBT ascendancy in the UK

Since 2014, following the release of the Consensus Statement and later the Memorandum of Understanding on Conversion Therapy, a *defacto* ban on therapeutic choice with respect to receiving professional help for unwanted sexual behaviours, feelings and attractions has been in place in the UK. In June 2014, Core Issues Trust published a Com Res^{24,25} poll asking the following questions, seeking public opinion on the matter:

¹⁹ <https://www.secularism.org.uk/uploads/uk-council-for-psychotherapy-consensus-statement-on-conversion-therapy.pdf?v=1502895374> Feb 2014.

²⁰ https://www.core-issues.org/UserFiles/File/Statements/Statements_2014/CIT_Statement_3_March_2014_UKCP_Consensus_Statement_Feb_2014_FIN_AL_1.pdf

²¹ November 2015. <https://www.psychotherapy.org.uk/media/npbjy1cw/memorandum-of-understanding-on-conversion-therapy.pdf>

²² October 2017 <https://www.bacp.co.uk/media/6526/memorandum-of-understanding-v2-reva-jul19.pdf>

²³ https://www.core-issues.org/UserFiles/File/Statements/Statements_2014/Statement_by_Core_Issues_Trust_18th_December_2014.pdf

²⁴ https://2sjwunnql41ia7ki31qqub1-wpengine.netdna-ssl.com/wp-content/themes/comres/poll/Core_Issues_Trust_Therapy_Poll_April_2014.pdf

²⁵ ComRes surveyed a representative sample of 2003 GB adults online on 9-10 April 2014. Data were weighted to be representative of all adults. ComRes is a member of the British Polling Council and abides by its rules.

Q.1 An MP is trying to change the law in order to ban therapists from offering verbal (talking) therapy to people who are attracted to people of the same sex but who want to reduce feelings. This therapy has not been shown to be harmful. In principle, would you support or oppose such a ban?

Q.2 Please imagine a scenario in which a married man with wife and children would like a therapist who offers 'talking therapy' to try to help him reduce his feelings of sexual attraction towards other men, in order to hold his family together. Do you believe that he should be permitted such help, or should he be refused it?

At the time, the poll (n= 2003) found that 64% - nearly two thirds - supported the right of people to seek therapeutic help to change, with 12% saying such help should be denied and 24% declining to offer a view. Or, put another way, the poll showed 2 to 1 opposition to a ban on therapy to change unwanted same-sex attraction, but opposition climbs to 5 to 1 in the case of man seeking help to 'hold his family together'.

In 2020 its sponsor, the Ozanne Foundation, polled UK residents (n=1671), who agreed that there should be a ban on conversion therapy. Only 14% believe there should not be a ban. Tellingly, the YouGov²⁶ poll defined 'conversion therapy' as "where people seek to change someone's sexual orientation, sexual behaviour or gender identity". The Question asked was:

Do you think 'Conversion Therapy', where people seek to change someone's sexual orientation, sexual behaviour or gender identity, should or should not be banned?

Clearly these surveys asked very different questions. The ComRes poll surveyed the *right to access help* from a client's perspective, the YouGov poll *surveyed the right to conduct interventions* that aimed to change sexual orientation. The first is about client rights, the second is about *ethical correctness of some people attempting to change other people's sexual orientation*. Although six years passed between the two polls, it is not surprising that the results show that significant numbers in the Com Res poll disagree with preventing (client) rights and that the second YouGov poll agrees with preventing rights (of the 'therapist') to try to change. It is clear that the YouGov poll cannot be used to show a shift in public opinion in the matter since very different questions are asked.

The juxtaposition of the two surveys usefully indicates a simple difference in approach that remains unresolved in the UK debate around sexual orientation, and therapeutic support interventions. This has to do with the question of agency. This is why the Consensus Statement on Conversion Therapy and Memorandum of Understanding on Conversion Therapy fail as instruments or protocols when addressing the issue of change allowing therapies. Both raise ethical objections to the agency of some 'people' who want to change other people's sexual orientation, but neither represents the agency of those persons who seek help and wish to change sexual orientation.

The circuitous argument and the critical need for ideological diversity

The argument is as follows: **Side A** states that 'Conversion Therapy' is morally wrong, is categorically harmful and does not work. All formerly LGBT (ex-gay or -trans persons) are deluded or worse; therapeutic interventions should be criminalised, even where the recipient requests help. LGBT is innate and immutable; a leopard cannot change his spots. **Side B** states that sexuality is fluid, gender is not. Therapeutic interventions should be available to persons who are free agents of their own sexual identity and trajectory, both of which may change in a person's lifetime. Those supporting such persons should have access to professional training and collegiality. Such providers should be regulated, not criminalised.

Clearly both sides of the argument have ideologically diverse perspectives, and both should be amenable to scientific inquiry and method for controversial issues. These might be the genetic contribution to sexuality, the role of agency and the fact that the by-product of some interventions is change resulting from change-allowing therapies known to be effective for some who are motivated. But this is where the narrative is unresolvable and is kept polarised, to the detriment of all, in the UK. Side B has been actively marginalised via the CSCT and MOU initiatives. The problem is the lack of ideological diversity at the negotiating table.

Monocultures opposing ideological diversity

²⁶ https://docs.cdn.yougov.com/ws6xam57wg/Ozanne_ConversionTherapy_200715.pdf YouGov Sample Size: 1671 Adults in GB Fieldwork: 14th - 15th July 2020

Space and time preclude recounting of the emergence and histories of the CSCT and MOU. Suffice to say that Side B has never been allowed to participate in discussion around these issues except in superficial ways. For example, in the case of the emergence of the MOU, conservative viewpoints were blocked by the United Kingdom Council of Psychotherapy:

In correspondence in 2015 from then Minister of State for Care and Support, the Rt. Hon. Norman Lamb said²⁷ when developing public policy for responding to “Conversion Therapy”, that the lead organisation, the UK Council for Psychotherapy “has not included Core Issues Trust to date because the collaborative work – beginning with the development of a consensus statement... and the subsequent work on the Memorandum of Understanding – was between organisations that had each independently come to a position opposed to conversion therapy”. This is evidence that in the UK, policy for this issue was generated by one ideological position and diversity of opinion was and is ignored.²⁸ Core Issues Trust (Charity NI 105095) calls for diversification of viewpoint when examining efficacy of professional psychotherapeutic and pastoral interventions and developing public policy. This will help to avoid confirmation bias. Consideration of multiple viewpoints and the encouragement of inter- and cross-disciplinary discussion will help to facilitate checks and balances in reporting findings and setting public policy that avoids ideological dominance of any group.

1.3. The UK’s *de facto* ban illustrated in context with reference to the Professional Standards Authority (PSA)

Quoting at length from a recent submission to the UK’s Gender Equalities Office (GEO) it is important to review the role of the PSA in entrenching the polarised view on managing sexual politics in the UK.

In February 2015, Core Issues Trust made a complaint against the PSA on the basis that the Authority, following a press statement entitled “The Professional Standards Authority Supports Action by Accredited Registers on Conversion Therapy”²⁹ closed the door to accreditation for any persons accused of “Conversion Therapy”. The substance of the complaint read as follows:

(1) that by this statement the **PSA contributes to discrimination against individuals** who voluntarily seek support for aspirations to reduce homosexual feelings and/or practices and who are unwilling to identify as homosexual... The PSA’s discriminative action represented in this statement **(2) closes the door** to those organisations seeking a register, who do not share values denying autonomous individuals the right to explore change or try to reduce orientation using the support of registered professionals... The PSA’s statement **(3) is misleading to the public** because it fails to acknowledge the fact that what it calls ‘conversion’ therapy – most likely the application of standard therapeutic modalities to explore change on a continuum – is not illegal in the United Kingdom.

After a lengthy review, the PSA did not support the complaint. In correspondence dated 1 June 2015 the PSA’s CEO Harry Cayton informed us:

After carefully reviewing the response that was sent to you by Suzanne Dodds, I can see that she has explained to you that the Authority has taken the view that gay conversion therapy is not compatible with our responsibilities under the Equality Act as being gay or lesbian is a protected characteristic

This summary indicates how the philosophy of “protected characteristics” and the collusion between the PSA, the Department of Health under Norman Lamb MP, and the CEOs of the UKCP et.al., ensured that any independent applications or complaints submitted by the IFTCC including why we were not consulted in the formation of the Memorandum of Understanding, were doomed to failure.

1.4. The role of the UK Government’s Equality Office (GEO)

²⁷ Correspondence from Minister Lamb (Department of Health) to Dr Mike Davidson (Core Issues Trust), date 20 January 2015.

²⁸ See O’Callaghan’s (2017) analysis: Conversion Therapy: A Briefing Note by Prof. M. King. and Prof. R. Song (June 2017) Some comments on two of the cited studies. https://www.core-issues.org/UserFiles/File/CIT_Response_to_King_and_Song_s_Science_Briefing_Paper_4th_July_2017.pdf

²⁹ PSA Press release dated 16th January 2015 <https://www.professionalstandards.org.uk/news-and-blog/latest-news/detail/2015/01/16/professional-standards-authority-supports-action-by-accredited-registers-on-conversion-therapy>

It is important to note a significant intervention in the Core Issues Trust application for Judicial Review in the UK's High Court following the banning of a London Bus Advert. The CIT advert had mirrored the charity Stonewall's "Some people are gay. Get over it!", saying in effect "some people *were* gay...". The then Secretary of State for Culture, Media and Sport and the Minister for Women and Equalities usefully intervened, which yielded an important finding. The judgement following the case that supported the Trust in this regard, as a result of this intervention, states:

Discrimination against a person because of his or her past actual or perceived sexual orientation, or because his or her sexual orientation has changed, is discrimination "because of...sexual orientation". There is no requirement in the EA (Equality Act) that discrimination must relate to a person's current sexual orientation. All that is required is that the discrimination is "because of sexual orientation"³⁰.

This 2014 case, ([Core Issues Trust vs Transport for London with a respondent from the Secretary of State for Culture, Media and Sport and the Minister for Women and Equalities](#)³¹) is an important indicator and recognition of the need to protect formerly LGBT persons against discrimination.

A Call for Evidence: "Embedding Equalities Across Government"

In a submission responding to a Call for Evidence to the UK's GEO³² in February 2021, the IFTCC and Core Issues Trust³³ (a UK-based charity and Christian Ministry initiative) made five requests to the GEO highlighting the issues (above) and relating also to the Professional Standards Authority (PSA). Points 1, 2 and 4 (below) are discussed in latter sections of this submission. The submission addresses the Minister's intention to ensure that "fairness" is a characteristic of ongoing equality in the UK. The GEO requested submissions addressing five terms of reference and stated that its new approach to equalities will be achieved:

First, by delivering fairness through modernisation, increased choice and openness.
Second, by concentrating on data and research, rather than on campaigning and listening to those with the loudest voices...

In summary, our submission raised the following points concerning the marginalisation and alienation of former LGBT persons in the UK:

1. We wrote to the Cabinet in 2018 offering them a document in response to the LGBT Research Survey and 2018 LGBT Strategy, ([A Response to the UK Government's Intended Ban on Therapeutic Choice](#))³⁴ but we received no response. **Would the Minister now respond to our efforts to engage with her office and the equality issues that impact on formerly LGBT persons?**
2. Given the appallingly one-sided reporting on the launch of the [2018 Faith and Sexuality Survey](#)³⁵, **will the minister consider the dual-departmental role her position necessarily occupies to include some care in the role the media is playing in the propagation of one-sided, mono-cultural hegemonies that limit opposing ideological viewpoints** that might otherwise act as checks and balances when considering the complex matter of sexual fluidity in human sexuality?
3. Given the legal points scored in the [Core Issues Trust vs Transport for London and Another - Secretary of State for Culture, Media and Sport and Minister for Women and Equalities](#)³⁶ where, in the Appeal Court in front of the Master of the Rolls, it was found that discrimination against formerly LGBT persons is illegal (paragraph 96 ff) according to the Equality Act 2010, **would the Minister affirm the agency and rights of formerly LGBT (or ex-gay) persons to seek support to live their lives with the help of professional carers who affirm their identities and practices?**
4. Given the apparent intention of the UN's Independent Expert on SOGI, Victor Madrigal-Borloz, to list those who detract from Gender Theory as a given, **will the minister challenge the development of**

³⁰ <https://www.bailii.org/ew/cases/EWCA/Civ/2014/34.htm>

³¹ Ibid.

³² The Role of the GEO: Embedding Equalities Across Government. Response to Call for Evidence from Core Issues Trust (CIT) and The International Federation for Therapeutic and Counselling Choice (IFTCC), February 2021.

³³ <https://www.charitycommissionni.org.uk/charity-details/?regId=105095&subId=0>

³⁴ <https://d3uxejw946d7m5.cloudfront.net/wp-content/uploads/2018/10/IFTCC-Response-to-UK-Government-Ban-on-Therapeutic-Choice-v2.pdf?x88743>

³⁵ <https://d3uxejw946d7m5.cloudfront.net/wp-content/uploads/2019/06/FSS-Response-web.pdf?x88743>

³⁶ op cit <https://www.bailii.org/ew/cases/EWCA/Civ/2014/34.htm>

(Soviet-style) anti-LGBT Southern Poverty Law Centre-type hate-group lists and show how “fairness” in her conceptualisation of the government’s new equality strategy might allow dissenting viewpoints?

Current concerns to ban so called “conversion therapy” stem from a political initiative led by former Minister of State Norman Lamb in collaboration (or collusion) with the then CEO of the UKCP, David Pink and Harry Cayton CEO of the **Professional Standards Authority (PSA) who worked to exclude any representation from persons formerly LGBT identified, or those professionals working to support their mental health needs. Will the minister consider the possible collusion of these parties that has led to the marginalisation of the ex-gay community in the UK and prevented any alternative viewpoint from emerging that will challenge the current state dogma on this issue?**

2. Observations about the gathering and use of data to promote LGBT acceptance in the UK, with reference to (1) the National LGBT Survey and (2) 2018 LGBT Action Plan.

On 3 July 2018, supported by the LGBT National Survey Report³⁷, the UK Government stated its intention, as one action point in its LGBT Action Plan³⁸, to ban “Conversion Therapy”. The National Survey Report provides a clear window into how data is gathered and used around gender theory and sexual politics in general. The Government’s Summary Report states that no definition of “Conversion Therapy” was provided³⁹, but the Research Report’s working definition (using inaccurate, misleading and defamatory language)⁴⁰ concludes that these are “techniques intended to change someone’s sexual orientation or gender identity”. Of obvious concern is how survey participants could meaningfully participate in the survey on “Conversion Therapy” if it was not properly defined as a concept. Even more concerning is that the survey excluded any former LGBT persons, directed as it was only to LGBT persons. In so doing any person who had benefitted from interventions and had left their LGBT identity was thereby marginalised and discounted. Results were therefore tendentious and unrepresentative and cannot be properly generalised.

In the ten points that follow, we argued at the time that everyone has the right to walk away from sexual practices and experiences that do not work for them and should be supported to do so. References to “endnotes” can be accessed in the original 2018 submission⁴¹.

1. When referring to “Conversion Therapy” the LGBT National Survey Report makes no reference to the published literature in the field nor to ideological diversity in research and debate, and as such represents “Advocacy Science”. Endnote 1

2. Governed by one ideological viewpoint, the UK’s Professional Mental Health bodies have for some time enforced a de facto ban on “Conversion Therapy”. Public opinion appears to be ignored. Dissension on the matter is not tolerated within professional memberships. This entrenches a monoculture, and view-point discrimination is the result; enquiry research has ceased on the topic, neither can it attract funding, or published recognition. Endnote 2

3. The National LGBT Survey (2018) is flawed. It is a volunteer online sample. Non-LGBT - and implicitly ex-LGBT – were ineligible. It is not clear how non-UK and multiple respondents were eliminated. It did not define ‘conversion therapy’ but asked only if people had experienced it or been offered it, and by who. It did not ask if the ‘conversion therapy’ was beneficial or harmful, nor the methods experienced. Policy and law based on this survey are therefore based on assumptions. Endnote 3

³⁷ <https://www.gov.uk/government/publications/national-lgbt-survey-summary-report>

³⁸ LGBT Action Plan 2018: <https://www.gov.uk/government/publications/lgbt-action-plan-2018-improving-the-lives-of-lesbian-gaybisexual-and-transgender-people>

³⁹ Summary Research Report 2018:14: “We did not provide a definition of conversion therapy in the survey, but it can range from pseudo-psychological treatments to, in extreme cases, surgical interventions and ‘corrective’ rape”. <https://www.gov.uk/government/publications/national-lgbt-survey-summary-report/national-lgbt-survey-summary-report>

⁴⁰ Research Report (2018:83): “So-called conversion therapies, sometimes also referred to as cure, aversion or reparative therapies, are techniques intended to change someone’s sexual orientation or gender identity. These techniques can take many forms and commonly range from pseudo-psychological treatments to spiritual counselling. In extreme cases, they may also include surgical and hormonal interventions, or so-called ‘corrective’ rape.” <https://www.gov.uk/government/publications/national-lgbt-survey-summary-report>

⁴¹ Pages 7-20: <https://www.gov.uk/government/publications/national-lgbt-survey-summary-report>

4. In UK society, ideological fault-lines separate those who conflate gender and sexual fluidity, from those who view sexuality as fluid and gender mostly as fixed. **Sexual Attraction Fluidity Exploration in Therapy (SAFE-T) is a valid and ethical response** to the extreme practices highlighted by the government's grab-all definitions.

5. **Evidence is being ignored that sexuality is not innate and is not immutable.** This evidence includes population studies. The public is being denied right of access to counselling, based only on fears of "potential harm" and ideological preference. (..) . Endnote 5

6. Neither the Research Report of the National LGBT Survey, nor the LGBT Action Plan pay any attention to **questions of personal autonomy nor to the implications of the proposed ban implied in the European Convention on Human Rights.** Endnote 6

7. The state church, the Church of England, has urged the government to impose this ban. Using anecdotal evidence of only one type, and claiming spiritual abuse, they have done so without presenting evidence of harm or malpractice. **The church has actively refused audiences to listen to the testimonials of once-gay and ex-gay persons.** Neither have they shown discernment of legitimate counselling practice. Endnote 7

8. The Prime Minister, the **Rt. Hon. Theresa May**⁴² and the Minister for Women and Equalities the **Rt. Hon. Penny Mordaunt**⁴³ have referred to the "abhorrent practice of 'Conversion Therapy'". They have nevertheless **actively declined to meet individuals who claim to have benefited from counselling support for unwanted same-sex attractions and gender confusions,** thereby denying their identities. Endnote 8

9. **The UK government's documentation does not appear to be aware that an unintended consequence of banning** counselling for unwanted same-sex attractions and gender confusion, will be increased suicidal ideation for this population group. Endnote 9

10. **Labelling Therapeutic Choice "Extremism".** Government officials have made the link between counselling which supports unwanted homosexual feelings and gender confusions as "non-violent extremism" as a means of suppressing legitimate counselling and the choice of clients seeking therapy or counselling. Endnote 10

Given the concerning misuse of data and poor research methodology that was not representative of the UK population by excluding former LGBT persons, the following recommendations are offered to the UK government:

1. **Corrective measures are undertaken to listen to those who have benefitted from therapeutic and counselling support** for unwanted same-sex attractions and gender confusions. The National LGBT Survey deselected any individuals positively helped by counselling and therapy, unlikely to retain an LGBT identity.

2. **Support, via the Professional Standards Authority, for practitioners operating according to agreed practice guidelines** is given to those offering counselling and therapeutic support for unwanted same-sex attractions and gender confusions. The IFTCC is an emerging organising provider of such professional standards.

3. **Recognition and development of case law highlighting "other" sexual minorities** such as "ex-gay" or those once gay or previously transgendered so that they are actually and not theoretically protected under the Equality Act of 2010 so that discrimination is unlawful.

⁴² ITV News, 3 July 2018: <https://youtu.be/CNeaEosWxOk>

⁴³ 4 July 2018 Launch Event LGBT Action Plan: "The plan's commitments range from a national lead on healthcare, to banning the abhorrent practice of conversion therapy, to action on hate crime and combating bullying in our schools" <https://www.gov.uk/government/speeches/launch-event-lgbt-action-plan-2018>

4. Acknowledgement that under-radar and clandestine operations are the product of bans.

Training, collegiality and accountability in cross-disciplinary learning environments are the best investment if harm is genuinely the government's concern.

5. Resources are deployed to support this minority group to access suitably trained practitioners who historically are denied access (because of the de facto ban) to professional certification, supervision, collegiality, continuing professional development and professional indemnity insurance.

3. Non-governmental initiatives challenging resistance to LGBT ascendancy in the context of The Faith and Sexuality Survey (FSS) and the role of (1) legacy media, (2) social media and (3) the banking sector.

For the purpose of this submission, the Faith and Sexuality Survey, widely sanctioned by the UK media, provides an example of problematic data collection and usage in respect to the LGBT and gender theory initiatives in the UK. According to Schumm,^{44,45} the Faith and Sexuality Survey produced by the Ozanne Foundation⁴⁶ is an example of advocacy science:

The FSS needs to be interpreted in a larger, historical context of the “weaponization” of science conducted in order to promote certain political or legal objectives. Science, *per se*, should ideally be neutral, an attempt to determine facts, including how concepts are related to each other. But to serve policy interests, science needs to be of the highest quality.

He proceeds to clarify the quality of data that should be used to inform public policy, and clearly missing in this study:

First, data should be made freely available to the general public so results can be independently replicated, as Professor Regnerus (2012)⁴⁷ did with his controversial data set. Second, data should be derived from random samples whose results can be compared to known population parameters. Non-random data may provide interesting results or suggest ideas for future research with random samples but, in my opinion, is so subject to selection bias, if not confirmation bias, that it should seldom be used to inform public policy or law. Another way of looking at that problem is that if you want to apply law or policy to all citizens, then the research should be representative of all citizens, not an unknown select few who most likely hold some strong pre-existing biases that may have inspired them, in the first place, to participate in a survey. Survey design should be strong so that skip patterns are clear and so that respondents answer all the questions with high completion rates for all questions that are applicable. Solicitation of respondents should not be designed to encourage those who will be most likely to support the political goals of the research. Research results should include standard deviations and effect sizes, without which trivial differences (in large samples) may be found to be statistically significant or strong effects (in small samples) may be found non-significant statistically. Questions should be symmetric. That is, if you want to ask about criminalizing change from gay to straight, what about change from straight to gay? Asking questions about only one direction of change, when there are at least two, suggests implicit bias. Statistical analyses should consider intersectionality, that is how various combinations of factors predict outcome variables rather than relying upon simplistic analyses. As this report will explain in much more detail, such requirements were not met with the FSS. Furthermore, basing changes in public or church policy on one study (equally valid argument with respect to the Regnerus study) is very risky as initial studies are often found to be incorrect (Ioannidis, 2005⁴⁸). For example, a great deal of early research indicated that same-sex parents were not more likely to raise children who would grow up to become lesbian, gay, or bisexual; however, more recent research contradicts that conclusion (Schumm, 2018⁴⁹).

⁴⁴ **Walter R. Schumm, PhD** is a professor of Applied Family Science in the College of Health and Human Sciences at Kansas State University. He is a retired colonel (U.S. Army) and a recipient of the Legion of Merit. His most recent book was Same-Sex Parenting Research: A Critical Assessment by Wilberforce Press.

⁴⁵ In FSS 2019 https://d3uxejw946d7m5.cloudfront.net/wp-content/uploads/2019/06/FSS-Response_web.pdf?x88743 pp4-5

⁴⁶ <https://ozanne.foundation/faith-sexuality-survey-2018/>

⁴⁷ Regnerus, M., How Different Are the Adult Children of Parents Who Have Same-Sex Relationships, *Social Science Research*; 41: 752-770.

⁴⁸ Ioannidis, JPA., Why Most Published Research Findings Are False, *PLoS Medicine* 2005; 2(8): e124.

⁴⁹ Schumm, W., 2018. Same-Sex Parenting Research: A Critical Assessment.

The IFTCC Report on the FSS provides the following summary of the issues found with the collection and use of data in a widely publicised report promoted uncritically by the UK media: (footnote references remain as the original displays them and may be found in the original IFTCC report on pp 37-38⁵⁰). Following the summary below, we will turn our attention to the role of the media in this context.

1. **The ONS⁵ estimates LGB are 2% of the UK population - an estimated 1,100,000 people aged 16+. In stark contrast, the FSS found 52% of its sample was LGBQ+.** In Q23 11.37% (458 people) said yes, they had actual experience of attempting to change their sexual orientation. Yet only 368 people gave any evidence of this experience in the subsequent branch of questions: too few to adequately examine something that could affect the lives of 1.1 million people⁴.
2. **The sample was also over-represented by a third in the age group 35-64 compared to the 2017 Office for National Statistics³ estimates of the UK population** and it was heavily biased towards Anglican Christians (41%). Taken together, these factors suggest that there is an 'Ozanne brand' which attracts a certain type of person who is motivated to respond in a particular way.
3. **FSS is partisan, and has errors in its design, with the effect that some key claims were not proven by the data.** Question 1 allowed 18-year-olds to put themselves into either category of 16-18 or 18-24. This limited the examination of data by age. Some data items are listed twice in one table - with different values. There were significant issues of missing data and data integrity: the FSS appears to have used both complete and incomplete survey responses and data are presented as a % of those answering each question, with a different denominator for each question. This means that, as presented, data from different tables cannot be accurately compared to each other. The possible routes through the survey seem to have had failures. Key questions were missed by most participants (Q27, Q29 - 'How long ago was this?') People were routed into questions without explanation, swelling numbers (Q21, Q22, Q33).
4. **Most respondents were teenagers last century: 72.08% of the respondents were over 35 years old.** 511 respondents were aged 16-25. Just 67 people were 16-18 years old.
5. **Data from Q20-22 are the basis of a serious allegation – that religious leaders forced people to attempt to change their sexual orientation.**^{6,7} FSS fails to clarify when this happened, not even if this is a current problem or one of last century. The responses from Q22 contradict Q20, indicating a problem in data collection. It would be unjust to change church and society based on these flawed data.
6. **No data were presented to indicate the chronological year, decade or century wherein any attempt to change sexual orientation occurred, or the form of attempt used, or its impact - not even for teenage respondents.** Therefore, current harm and the need for more safeguarding are not proven.
7. **Some of the 16 cited 'forms of attempt' to change sexual orientation used to be practised by the NHS.**^{8,9,10,11,12,13,34} Some of these practices – abandoned for this purpose last century as unethical - could only ever have been practised by a registered doctor or psychiatrist.¹³ Professional psychotherapy with the goal of sexual orientation change was banned in 2014 by public policy^{14,15}, so the youngest are unlikely to have experienced this either. Also cited was forced sex – which is already addressed by the laws on rape. Other 'forms of attempt' included spiritual practices such as prayer, fasting, and healing with religious ministry, family or friends. To conflate all these 16 together was misleading and unhelpful. The implication that prayer and personal relationships should be controlled raises serious issues of religious and personal freedom.
8. **The reported figures for mental health are within the range seen in similar volunteer online LGBQ surveys not predicated on therapy.**^{20,21} Degrees of self-harm, eating disorders, and suicidal thoughts/actions are comparable to the survey 'Life in Scotland for LGBT Young People' 2018²⁰. Owing to survey design, the FSS fails to show an exclusive link between attempts to change sexual orientation and suicidal ideation and self-harm. Representative studies have shown that all LGB are at increased risk of poor mental health and low wellbeing.^{16, 17, 19, 22, 23, 24} Several studies in several countries show that for some, sexuality can change with or without therapeutic help.^{23,24,27,28,29,30,31,32,33}

⁵⁰ Ibid: pp 37-38. https://d3uxejw946d7m5.cloudfront.net/wp-content/uploads/2019/06/FSS-Response_web.pdf?x88743

9. **FSS Q31 (answered by 361 respondents) reports 13 people who said their attempt to change sexual orientation worked completely, and another 60 who said, 'It seemed to work for a while'.** Bisexuals were the second largest sexual minority in the FSS and yet they were ignored in the analysis of results. FSS fails to address the conflict between banning therapy to support LGB people's heterosexual capacities,^{22,35} and the heterosexual relationships of bisexually attracted people²⁵ – despite public data showing that when bisexuals marry, it is almost always to the opposite sex.⁵
10. **That the majority (51.1%) of respondents to the FSS were in favour of criminalising therapy is a weak result for such a biased sample.** It was the youngest - who were the least likely to have experienced any therapy - who were the most likely to want it banned. This therefore is a prevailing point of view irrespective of experience. The FSS is demanding criminalisation and additional safeguarding, and implicitly seeks an end to religious ministry or even prayer in support of opposite sex marriage and attraction. Yet counter to the claims made, no harm was been demonstrated to be happening now. The FSS demands are not supported by its data as presented. It would be a seriously retrograde step if science were to be decided by majority vote.

3.1 The Role of the Legacy Media in the UK in the Uncritical Promotion of Gender Theory and LGBT Ascendancy

The FSS (2018) provides a useful context to examine the role of the legacy media in promoting LGBT ideology in the UK. When the survey report was released, Moseley reported that the main media channels that promoted the survey findings were Channel 4 News⁵¹, the Guardian⁵², the Express⁵³, the Daily Mail⁵⁴ and Reuters⁵⁵. The following extracts reveal examples of the inherent problems with advocacy journalism that refuses to engage critically with the subject on which it reports:

With respect to **Channel 4 News** Moseley asks -

The question in all of this is how did Channel 4 News make its editorial decisions on the topic? Why did it not interview anybody who had been involved in actual counselling or psychotherapy? And why did it not acknowledge what even the Faith and Sexuality Survey itself admitted, that some people did experience change in sexual orientation?

Concerning the **Guardian's** report her observations are penetrating:

...the Guardian article did acknowledge that the FSS found that thirteen people who responded said that attempts to change their sexual orientation 'said it had worked completely.' This is a crucial fact because it undermines the entire argument made by the Ozanne Foundation that all attempts at change should be banned on the grounds that they are harmful. The question to ask here is why did the Guardian not inquire further about this discrepancy? Would not the duty to provide unbiased journalism require this?

With respect to the **Express** report, note also Moseley's comments:

Perhaps the most misleading news headline in relation to the FSS was that by the Express: 'Gay Christians in the UK 'forced to have straight sex in gay cure therapies' – shock survey'. The subtitle ran as follows: 'HUNDREDS of gay Christians in the UK are being forced to deny their homosexuality in gay therapy rituals, with some being made to have straight sex, a shock report has revealed.'

The final example concerning reporting on the FSS highlighted by Moseley relates to **Reuters**:

⁵¹ <https://www.channel4.com/news/the-impact-of-gay-conversion-therapy-on-mental-health-in-uk>

⁵² <https://www.theguardian.com/world/2019/feb/20/conversion-therapy-can-result-in-mental-illness-poll-finds>

⁵³ <https://www.express.co.uk/news/uk/1090401/gay-christians-christianity-conversion-therapy-survey-poll>

⁵⁴ <https://www.dailymail.co.uk/news/article-6726761/Gay-people-forced-straight-sex-religious-conversion-therapy.html>

⁵⁵ <https://uk.reuters.com/article/britain-lgbt-religion/fifth-of-gay-brits-who-try-to-change-sexuality-attempt-suicide-survey-says-idUSL1N20F1HZ>

The headline ran 'Fifth of gay Brits who try to change sexuality attempt suicide, survey says'. The article omitted to say that the sample was not representative of the UK population. Reuters used the following definition of 'conversion therapy':

'Conversion therapy, which can include hypnosis, electric shocks and fasting, is based on the belief, common in conservative religious communities, that being lesbian, gay, bisexual or transgender is a mental illness that can be cured.'

This 'definition' instantly discredits Reuters as a serious source of journalism on the subject, as it does not even include normal talking therapy as part of 'conversion therapy'. It makes transparent the fact that the term has been made up to discredit all attempts at change...

In conclusion the IFTCC report offers this summary to illustrate (in the context of the Ozanne Foundation's release of the FSS):

What this amounts to is a serious lack of curiosity and critical questioning on the part of the journalists reporting on the Faith and Sexuality Survey. This is a real problem given that these are key qualities required of journalists if they are to excel in their profession. No alternative or critical viewpoint is sought out on the Survey. It is noteworthy that not one single news item cited an alternative or critical viewpoint on the survey and its subject matter. No further inquiry was made about the thirteen people who reported a complete change in sexual orientation. This shows a clear journalistic bias against these people. The press need to be reminded that under Article 14 of the European Convention on Human Rights people have the right to determine their sexual orientation.

3.2 Social Media

In February 2021, the Observatory on Intolerance and Discrimination of Christians in Europe reported the permanent unpublishing of the Core Issues Trust Facebook page⁵⁶. This followed the release of a statement by the organisation⁵⁷. The unilateral action by Facebook was not unexpected, given the active role the platform had played in inciting violence towards the Trust members or Staff and supporters.

In May 2020, Core Issues Trust was the subject of media reports^{58,59} indicating that the National Secular Society (NSS) was challenging the Trust's registration with the Northern Irish Charity Commission on the grounds that it purveyed "Conversion Therapy". The Trust issued a statement denying this accusation⁶⁰.

Shortly after this the Trust sustained significant online harassment which culminated in a campaign to close our bank accounts and to disrupt our charity work⁶¹. Barclays Bank, along with Mail Chimp and PayPal unilaterally closed our accounts. Significant interruption of our social media accounts was also experienced. The Trust filed four Serious Incident Reports to the Northern Irish Charity Commission, at the time of these events.

It also made a submission to the Westminster Government's Petitions Committee which had called for "Written Evidence of Online Abuse". The submission provided evidence of online harassment and abuse with specific reference to the misattribution of "Conversion Therapy" to our organisation which had formed the basis of the targeted abuse the Trust was experiencing. The following evidence was submitted (without any subsequent follow-up or discussion):

1. Unscrupulous punitive actions or actions facilitated by providers such as PayPal, Mail Chimp and Wikipedia.
2. Evidence of orchestrated incitement to hate
3. Significant numbers of unsolicited abusive telephone calls, emails, text messages over the period 28 June to the date of this report – Sunday 5th July 2020.

⁵⁶ <https://www.intoleranceagainstchristians.eu/index.php?id=12&case=4424>

⁵⁷ https://www.core-issues.org/UserFiles/File///Closure_of_Core_Issues_Trust_FB_Statement_FINAL.pdf

⁵⁸ <https://www.belfasttelegraph.co.uk/news/northern-ireland/complaint-over-charity-status-of-gay-conversion-group-core-issues-trust-in-northern-ireland-39201914.html>

⁵⁹ <https://www.civilsociety.co.uk/news/call-for-charity-regulators-to-remove-registered-charities-advocating-for-gay-conversion-therapy.html>

⁶⁰ <https://www.core-issues.org/news/response-to-national-secular-society-campaign>

⁶¹ <https://www.lifesitenews.com/news/after-lgbt-mob-attacks-world-leading-bank-to-close-christian-counseling-orgs-accounts>

4. Rising numbers of abusive Facebook and YouTube postings.
5. Harassment of Core Issues Trust via (1) personal social media profiles using inappropriate images and (2) requests to confirm unrequested pornographic accounts to the address info@core-issues.org.

The above was also reported to the PSNI in Belfast: Case reference number 955 30/7/20. The Investigating officer's name was Constable Wilson, with no action being taken.

Summary of contents of this submission: From Saturday 28th June 2020 – Sunday 5th July 2020, the Trust experienced a high level of online harassment towards its personnel.

1. Before or during this campaign the Trust had all PayPal accounts permanently terminated. The organisation's Mailchimp account was similarly unilaterally terminated with no warning of non-compliance.
2. During this time frame, a Wikipedia page posted libellous statements about the Trust, which is proving difficult to alter. The Trust must now resort to legal means.
3. Evidence covers social media incitement to "badly review".
4. Some 300 unsolicited "nuisance" calls were received over the period with numerous hateful messages that interfered with the work of the charity and made access to our services more difficult for genuine enquiries. Evidence exists of incitements on social media platforms.
5. Several of the (nine) social media platforms belonging to Core Issues Trust were consistently abused, with vitriol extending to the personal profiles of those working for Core Issues Trust.
6. Numerous unsolicited emails were received inviting persons linked with info@core-issues.org to confirm memberships on pornographic websites or advice to attend various medical clinics.
7. Inappropriate, and in some cases "Satanic" SMS texts were received attaching inappropriate images and encouraging CIT staff members to kill themselves and wishing their families to be raped.
8. Core Issues Trust is concerned that the apparent immunity of LGBT activist perpetrators is the legacy of the on-going disinformation provided by the "mainstream" (legacy) media. This is aggravated by refusal of the UK government to actively recognise that ex-gay persons are protected under the Equality Act of 2010, along with media claims that therapeutic choice is tantamount to "torture".

Following this social media led campaign and following calls on social media (Facebook) for Barclays to do so, Barclays Bank indicated by correspondence dated 13th July 2020, that it would close accounts for both Core Issues Trust and the IFTCC, by the 14th September 2020. This was then done, prompting international media attention^{62,63,64,65}.

3.3 Banking Sector

Since the closure of Core Issues Trust's Barclays Bank Accounts is now a matter for the courts, no further comment will be made about this in this submission.

4. Summary and Conclusion

Our submission to the Call for Input from the UN Independent Expert on SOGI, offers the perspective of the International Federation for Therapeutic and Counselling Choice in the context of the United Kingdom, on challenges to gender ideology in the country. We indicate how the state appears to collect data, provide definition, relate to treaties, declarations, programs and policies relevant to the Call for Input. We have also commented on the use of narrative with reference to sexual orientations, again with special reference to the UK since that is where we operate from and are registered. Our submission has revolved around three areas: (1) the main mechanisms used to challenge any resistance to LGBT orientations and gender theory in the UK, (2) by providing observation about how data has been gathered and the mechanisms used to promote LGBT ascendancy in the UK. Specifically, we have made reference to the National LGBT Survey and UK's 2018 LGBT Action Plan. We have broadened the context of our submission and the examples that illustrate it by reference to private sector initiatives that challenge any resistance to Gender Therapy or LGBT orientations, by reference

⁶² <https://www.thisismoney.co.uk/money/markets/article-8924111/Barclays-sued-gay-conversion-Christian-group.html>

⁶³ <https://www.forbes.com/sites/jamiewareham/2020/07/25/barclays-closes-uk-christian-charity-bank-account-offering-lgbt-conversion-therapy/>

⁶⁴ <https://www.newsletter.co.uk/business/ni-based-anti-gender-confusion-charity-says-barclays-bank-axed-its-account-following-social-media-campaign-2923950>

⁶⁵ <https://www.foxnews.com/world/christian-ministry-uk-death-threats>

to the Ozanne Foundation's Faith and Sexuality Survey (FSS) – widely promoted and advertised by all sectors of the UK Media and offer the following conclusions.

1. There is already a *de facto* ban on “conversion therapy” in the UK that has been in operation since 2014 following the release of the Consensus Statement on Conversion Therapy (CSCT) and later with the Introduction of the Memorandum of Understanding on Conversion Therapy (MOU). This has achieved a high level of consensus among the professional mental health bodies signed up to it in proscribing any therapeutic interventions allowing choice or agency for individuals who seek to address unwanted sexual and relational issues.

Question: If a man falls in love with a woman but wishes to seek therapeutic help to save his marriage relationship in these circumstances, there is nothing to prevent him from receiving such assistance. If a man falls in love with another man, and seeks to receive counselling that might end, or reduce his feelings attractions and or behaviours towards this other man, he will be denied therapeutic assistance to achieve his personal goals. How is it fair that only LGBT affirming counselling or therapy is available to a population group?

2. We have demonstrated that the **National LGBT Survey has serious flaws in its data collection and manipulation which must have a bearing on the LGBT Action Plan 2018**, yet the Government is still acting on its intention to ban “Conversion Therapy”, based on this data. For example, the data omitted any person who was not LGBT identified when collecting data, meaning that any person benefitting from therapeutic interventions was ignored.

Question: Nothing is known about the motivation, sense of personal agency in maintaining their identity, nor of the support that Former LGBT persons desire and need. Nothing is known about suicide completion rates among this population. **Does the UN's Independent Expert on SOGI support enforcing therapeutic bans where there is no research evident into the nature, extent or wellbeing of the Former LGBT population in the UK (or anywhere else as far as we can see)?**

3. We have illustrated with reference to the uncritical promotion of the Faith and Sexuality Survey the **role of the legacy media in promoting Gender Ideology**, at the expense of Former LGBT persons.

Question: **how does the UN's Independent Expert on SOGI intend to address the clear discriminatory practices likely to arise when only one viewpoint is allowed to exist in the matter of LGBT ascendancy** and the promotion of Gender Theory? What safeguards for viewpoint discrimination are in place in the promotion of his work?

In Conclusion

The IFTCC supports LGBT dignity and rejects any form of violence in the promotion of competing ideologies. We support the fundamental human rights of all persons regardless of race, sexual orientation or gender. Having observed former reports from the UN Independent Expert on SOGI, we believe he has overstepped his mandate by laying the foundations for and promoting radical ideology and gender theories that will hurt societies and compromise the security of our world. We see no consensus within the UN to support his approach.

According to A/HRC/RES/5/1⁶⁶, principles to be used in institution building of the United Nations Human Rights Council include: Universality, Impartiality, Objectivity, Non-selectiveness, Constructive Dialogue and Cooperation. We do not believe the call to participate in this reporting can possibly reflect these values since the values themselves appear to have been captured by the LGBT ideology assumed in the invitation to participate.

We call on the UN to review both the basis and process of the UN Independent Expert on SOGI's mandate and how it is fulfilled and to seek to correct the Gender Theory monoculture that he appears to favour, by including diverse ideological and cultural viewpoints that will challenge the position assumed in this proposed report.

Submitted 11th March 2021. IFTCC London.

⁶⁶ <https://unispal.un.org/UNISPAL.NSF/0/325B5DF6ABBFBF268525734100634561>