

The Ban Conversion Practices Coalition Response to the Conversion Practices (Criminalisation) Bill Call for Evidence

September 2026

The Ban Conversion Practices Coalition is a group of human rights organisations, youth groups and faith bodies, who are working together to ensure that no one in Northern Ireland has to undergo harmful and abusive conversion practices. The World Health Organisation (WHO), the World Bank, and the United Nations (UN) have condemned conversion therapies, and numerous countries across the world have banned their use and promotion on the basis that they infringe on the human rights of LGBTQI+ people.¹ Just this year, the Council of Europe's Parliamentary Assembly called for comprehensive bans on these practices, including criminal sanctions for their delivery.²

The UK's National LGBT Survey, conducted in 2018, found that while these practices occur across the UK, they are over twice as prevalent in Northern Ireland, with 12% of individuals being offered or undergoing conversion practices here compared to 5% for the whole of the UK.³ A report conducted by Galop, *'Still not Illegal: Evidence of Modern Day Conversion Practices from Galop's Frontline Services'* (2026) found that transgender people were the most at risk of being offered or subjected to psycho-medical conversion practices.⁴

Conversion practices are based on the false premise that a person's sexual orientation or gender identity can be, or needs to be, changed or suppressed. Attempts to change and suppress an individual's sexual orientation or gender identity can lead to significant harm and distress, often with lifelong consequences. The Coalition has therefore welcomed the introduction of the Private Members' Bill, brought forward by Eóin Tennyson MLA, which would create criminal sanctions with a maximum custodial sentence of two years for carrying out conversion practices or removing an individual from Northern Ireland for the purposes of conversion practices. The Bill includes protections for freedom of speech, belief, and the delivery of legitimate healthcare and therapy.

There is currently no legal ban on conversion practices in Northern Ireland, covering acts including talking therapies which intend to change or suppress someone's sexual orientation or gender identity. While this Bill provides important protections, the Coalition will also suggest that there are ways in which the Bill could be

¹ [OHCHR | Report on conversion therapy](#)

² Council of Europe (Jan 2026) - [Council of Europe body calls for ban on conversion practices](#)

³ UK Government Equalities Office (2018) - [National LGBT Survey Research Report](#)

⁴ Galop (2026) - ["Still Not Illegal": Evidence of modern-day conversion practices from Galop's frontline services](#)

strengthened to ensure that there is a fully effective, loophole free ban which protects all LGBTQIA+ people from these harmful practices.

Clause 1 would make it an offence to provide or carry out conversion therapy where the person intends to change or suppress the victim's sexual orientation or gender identity, and the victim suffers physical or psychological harm as a consequence. Do you support this approach?

Yes, to some extent.

There is currently no stand-alone criminal offence for engaging in conversion practices. While some types of conversion practices, where they take the form of physical or sexual violence or domestic abuse, may be covered under existing legislation, a standalone offence is long overdue to ensure that these practices, whatever they look like, are reduced and eventually eliminated.

The inclusion of both 'sexual orientation' and 'gender identity' is vital to ensure that all LGBTQIA+ people, regardless of their identity, are covered under any ban. This should include trans people of all genders, as well as individuals of any sexual orientation, including those who are asexual. Existing international legislation across Europe and beyond has incorporated this comprehensive coverage of sexual orientation and gender identity. As referenced above, trans people are generally at higher risk of being offered or subjected to some forms of conversion practices.⁵

Additionally, the language of 'change or suppress' is vital for recognising the reality of how conversion practices are delivered. Many instances of these practices focus on encouraging and coercing an individual into suppressing their LGBTQIA+ identity and not acting on it. For instance, this may include encouraging lifelong celibacy for the purposes of suppressing an individual's same-sex attraction. Attempts to change or suppress a person's sexual orientation or gender identity can be equally damaging and have lifelong effects.

One woman - who has decided to anonymously share her story with the coalition to raise awareness of the harm of conversion practices - stated: "it's ten years later and it still has a massive impact - it is definitely a factor in how bad I feel at the moment." These practices have also had an impact on her current relationships: "I don't date girls now - because that inner voice is always there - I don't think that will ever go away. This all goes on in my head when I start a relationship - this is why I am still single." She added, "I would give anything to be straight. I hate the way I am". This woman's experience demonstrates the profound and long-lasting impact on

⁵ Ibid, UK Government Equalities Office (2018) - [National LGBT Survey Research Report](#)

individuals subjected to conversion practices, even a decade on from when they were carried out.

The Ban Conversion Practices Coalition therefore supports the definition in this Bill and advocates for a loophole free, comprehensive ban to ensure that no one has to experience conversion practices and suffer the subsequent lifelong effects.

We do, however, have concerns that the requirement for proving ‘physical or psychological harm’ may create barriers to reporting and prosecution, particularly as it may take many years for people who have experienced conversion practices to come forward about their experiences. Some victims/survivors may also see themselves as not being harmed. In our view, however, conversion practices are *inherently* harmful, and are based on the entirely false premise that a person's sexual orientation or gender identity can be, or needs to be, changed or suppressed. The World Psychiatric Association (WPA) found that ‘there is no sound scientific evidence that innate sexual orientation can be changed’.⁶ As such, we find the inclusion of the requirement that a victim has to *prove* ‘physical or psychological harm’ to be unnecessary and argue that if someone has undergone these traumatic and abusive practices, there should be no additional requirement to prove this harm.

Are the elements of the offence sufficiently clear, including the requirements relating to intent, harm, the reasonableness defence, consent and penalties?

Yes, to some extent.

While the elements of the offence are clear, we have concerns regarding the height of the prosecutorial bar when they are considered in the round. The ‘mens rea’ requirement relating to the perpetrators’ ‘intent to change or suppress’ a person’s sexual orientation or gender identity is clear; however, it creates a high bar for prosecution, particularly when coupled with the requirement for the person to prove that they experienced harm.

We understand that there must be certain tests for prosecution, lest a law be drafted so broadly that it unwittingly captures activities outside of its intended scope. However, requirements to prove both the motivation of the perpetrator - a notoriously difficult task in prosecution - *and* harm done to the victim will create a bar that few cases will reach.

As already stated in our previous answer, the inclusion of the requirement that a person who has undergone conversion practices has to prove ‘physical or psychological harm’ is unnecessary as attempts to change or suppress someone’s identity are *inherently* harmful. In cases of domestic abuse or common assault, the

⁶ World Psychiatric Association (Sept 2023) - [WPA Position Statement on Gender Identity and Same-Sex Orientation, Attraction, and Behaviours](#)

act itself is deemed an offence, regardless of what impact it had on the individual. Trying to 'prove' harm has the potential to re-traumatise the victim/survivor, and undermines the fact that the practice itself is wrong and harmful.

While we accept that the defence of reasonableness is present in other areas of legislation such as the Domestic Abuse Proceedings Act, we are not convinced that this defence is applicable to the issue of conversion practices. In the case of this Bill, it is hard to fathom that a conversion practice would meet the tests set out above, while also being 'reasonable' within the circumstances. Namely, the proposal sets out that in order for the test of a conversion practice to be met, either a conversion practice was administered through the provision of a service or coercive course of behaviour; that there was a specific victim of the practice; that the perpetrator *intended* to change or suppress the victim's sexual orientation and/or gender identity; and that the victim experienced physical or psychological harm.

Moreover, the 'reasonableness' defence has a long and relatively controversial history in common law in the UK. The defence is commonly found in legislation relating to violence, coercive control and harassment, and sexual assault, including in recent legislation covering non-fatal strangulation. It is utilised in the 'reasonable chastisement' defence to common assault, where it relates to the parenting of a child; the Serious Crimes Act 2015 uses the reasonableness test in what is dubbed the "Carer's Defence" relating to the offence of controlling or coercive behaviour in an intimate or family relationship defence; and its use as a defence in sexual violence cases, where the perpetrator has a 'reasonable belief' that their accuser had consented.

In the context of sexual offences, where reasonable belief remains a defence, feminist activists maintain that reasonable belief allows space for myths and misconceptions about consent to continue to permeate sexual relationships, rather than sending an unambiguous signal that these behaviours are unacceptable. In their response to the Domestic Abuse and Family Proceedings Act (then Bill) the Women's Policy Group argued that a reasonable defence could risk being used as a justification of abuse by defendants. In creating such a provision, the policy group expressed concern that perpetrators can justify their abusive behaviour through portraying victims of abuse as mentally unstable, unable to make decisions for themselves, having a history of addiction that can be used against them.

Furthermore, victims may suffer from mental health issues caused by abuse and disabled women, who are already more likely to be victims of domestic abuse, could find themselves being disproportionately impacted by the

implications of a “reasonableness defence”. We are unsure how this defence of reasonableness would play out in the judiciary, or how the above tests could be met while it also being deemed that the practice or behaviour was reasonable. We therefore advocate for the Assembly to consider its removal from this Bill.

We do, however, appreciate that there is no defence of consent included in this Bill. Decisions to participate in conversion practices occur in contexts where there is an imbalance of power, within a society where LGBTQIA+ identities are often viewed or portrayed as inherently flawed or wrong. Recent research conducted in Northern Ireland explored the issue of consent and concluded that, under these conditions, there is pressure on individuals to participate in conversion practices, and the concept of freely consenting to these practices is difficult, if not impossible, to sustain.⁷ There needs to be an acknowledgement of the context that conversion practices take place in situations where there is a background of individual, familial, organisational, and societal stigmatization of LGBTQIA+ identities.

Recent UK Government research clearly exposes the boundary between consent and coercion when conversion practices are blurred.⁸ People subjected to conversion practices felt their consent was given in the context of differential power and they were often ‘led’ into it by people in positions of authority over them. Belgium, Cyprus, France, Portugal, and Spain include consenting adults in their bans.

If we accept that conversion practices do not work - a subject on which there is an overwhelming medical and scientific consensus⁹ - and that it causes harm - which, again, there is significant consensus on, including from local research¹⁰ - then it follows that an individual cannot, in a fully informed manner, consent to these practices. Moreover, if the person is not made aware of the potentially negative effects detailed in the scientific literature, then the person's consent cannot be understood as informed. There is clear case law established in the UK, and later translated into legislation, refuting the notion that an individual can consent to their own harm - specifically, *R v Brown*¹¹ established, particularly in cases involving injury or death for the purpose of sexual gratification, that an individual cannot consent to their own harm.

Clause 2 would make it an offence to engage in coercive conversion behaviour where the person intends to change or suppress the victim's sexual orientation

⁷ Ibid, F Ashe & D Mackle (2023) - [A Study of Conversion Practices in Northern Ireland](#)

⁸ UK Government (2021) - [Conversion therapy: an evidence assessment and qualitative study](#)

⁹ American Psychological Association (2009) - [Report of the American Psychological Association Task Force on Appropriate Therapeutic Responses to Sexual Orientation](#)

¹⁰ Ibid, F Ashe & D Mackle (2023) - [A Study of Conversion Practices in Northern Ireland](#)

¹¹ House of Lords Judgement (1997) - [R v. Brown](#)

or gender identity, and the victim suffers physical or psychological harm as a consequence. Do you support this approach?

Yes.

It is useful that the Bill has drawn on the definition of coercive behaviour from the Domestic Abuse and Civil Proceedings Act (Northern Ireland) 2021 to strengthen gaps in current legislation and ensure that a robust definition of coercive control is provided. Currently, in the 2021 Act, people must be personally connected for a prosecution to occur. This Bill will close this gap for a victim of conversion practices who has been subject to coercive conversion behaviour and is not connected to their perpetrator.

We wish to clarify, however, that requiring a conversion practice to be a 'coercive' course of behaviour could constitute a consent loophole. If an individual were to approach another individual and request conversion practices, an effective ban must still prevent that individual from being subjected to them, even if there is no 'coercion' involved. This is why it is vital that the offence should, as stated in the proposal, cover either the 'provision of a service' or a 'coercive course of behaviour', and that both do not need to be present for a conversion practice to occur.

Are the elements of the offence sufficiently clear, including the requirements relating to intent, harm, the reasonableness defence, consent and penalties?

Yes, to some extent.

The Coalition shares similar concerns to Clause 1 in respect of both the intent and harm thresholds, particularly when read together.

We would seek more clarity on why the 2 years maximum sentence was given in this Bill, despite the inclusion of a 5 year maximum sentence in the draft legislation in England.

Clause 3 would make it an offence to cause or facilitate a person leaving Northern Ireland for the purposes of being subject to conversion therapy or coercive behaviour. Do you support this approach?

Yes.

This is a clear mechanism to prevent a loophole, particularly in the Northern Ireland context where people often access healthcare in the Republic of Ireland or in Great Britain. Not all jurisdictions in the UK and Ireland are progressing a ban on conversion practices in tandem with Northern Ireland. The ban in the Republic of Ireland has stalled and is unlikely to pass within the timeframe of this Bill, creating a risk that these practices will simply be displaced rather than eradicated. There are

clear indications that legislative bans lead to the relocation of institutions offering such services to neighbouring EU countries, or, in the case of Spain, regions. For example, after Germany placed such a ban and given the likelihood of Austria doing the same, their conversion practice institutions have moved to Switzerland, where they continue to be provided.¹²

We also know that for many migrant and refugee LGBTQIA+ individuals, there is a higher likelihood that they may be taken back to their country of origin in order to be subjected to these practices. Often, the most serious and traumatic conversion practices are delivered overseas, in jurisdictions where LGBTQIA+ rights and social perceptions are much worse than in Northern Ireland. Individuals must be protected from these practices. The Coalition, therefore, supports the inclusion of this Clause and would urge the Assembly to recognise the vulnerability of particular groups who are at greater risk of being removed from Northern Ireland for the purposes of conversion practices.

Are the elements of the offence sufficiently clear, including the requirements relating to intent, recklessness as to harm, the reasonableness defence, consent and penalties?

To some extent.

Given that many of the people subject to conversion practices being removed from Northern Ireland may be subject to a more violent form of conversion practices, the Coalition would be supportive of a higher sentence being placed on this offence. The Coalition would urge the Assembly to raise the maximum sentence, in line with the draft legislation in England, to 5 years. The Coalition would also caution against using a fine as a sentencing outcome, as many larger organisations carrying out conversion practices will simply absorb this cost.

We would also urge the Assembly to consider age. In considering age, we would suggest that a vulnerable persons category (including minors), be added to the Bill. For example, in Iceland the law punishes anyone making an adult undergo conversion therapy with a sentence of up to three years in prison, increased to five years maximum if Conversion Therapy is enacted on a child.¹³ Cyprus also provides separate higher penalties if the act was applied to a minor. A higher sentence may therefore be required to target those administering conversion practices on vulnerable persons.

¹² European Parliament Briefing (2024) - [Bans on Conversion 'Therapies' - the situation in selected member states](#)

¹³ Iceland Government (2023) - [General Criminal Code \(Suppression Therapy\)](#)

Clause 4 defines conversion therapy as including counselling or any form of talking therapy, coaching or instruction, and treatment or purported treatment. Is this definition sufficiently clear and appropriate?

Yes.

We understand that this definition is clear. The Coalition welcomes the inclusion of this definition, as it covers elements of therapy that are not currently prosecutable under existing legislation. Under existing legislation it is legal to set up a counselling service for the purposes of changing or suppressing someone's sexual orientation or gender identity.

Does Clause 4 provide sufficient clarity on the circumstances in which regulated healthcare professionals would fall outside the scope of the offence?

Yes, to some extent.

The Coalition understands why the exclusion of regulated healthcare professionals is included in Clause 4, as they would already be signed up to the UK Memorandum of Understanding - a joint document signed by over 25 health, counselling and psychotherapy organisations (including NHS England, British Psychological Society and Royal College of Psychiatrists) which aims to end the practice of conversion therapy in the UK¹⁴. However, in the unlikely event that a conversion practice did take place within a regulated healthcare space, as part of that professional's regulated work, the exclusion would mean that the healthcare professional wouldn't be subject to prosecution under this Bill.

In the recent local research study of conversion practices, 9 participants reported experiencing conversion practices through talking therapy. One participant stated: "I saw one person, and that was the person that gave me the counselling, the conversion therapy. He's a therapist. He's a psychotherapist or a psychologist that's offering active therapy as opposed to just speaking and like counselling, discussing a situation. He was actively, proactively using therapy techniques."

The creation of an offence that covers the provision of a service intended to suppress or change a person's sexual orientation and/or gender identity is critical to cover all forms of these practices *and* to ensure they are not conducted within statutory services.

Clause 4 would allow the Department of Health, by order subject to Assembly approval, to amend the list of regulatory bodies whose registered professionals may fall outside the scope of the conversion therapy offence when acting in

¹⁴ The British Association of Counselling and Psychotherapy (2026) - [The Memorandum of Understanding](#)

accordance with applicable standards and codes of ethics. Is this delegated power appropriate?

Unsure

The Coalition remains unconvinced that this carve out for registered health professionals is needed. It is worth acknowledging that there are instances, including within the aforementioned Study of Conversion Practices in Northern Ireland, where conversion practices are delivered within regulated healthcare settings. These regulatory organisations' support for the Memorandum of Understanding on Conversion Practices, while significant, does not in and of itself ensure that these practices are not delivered within their regulated settings.

We do, however, support that this exclusion is not so broad that it captures *all* healthcare settings, whether regulated or not. A significant proportion of conversion practices take place within an organisation or service based in the community, such as a youth service or a pseudo-psychotherapeutic organisation.¹⁵ It is vital that the law captures all the ways in which these practices may occur, including in a community-based health organisation through the provision of a service. We wish to ensure that there are sufficient checks and balances to prevent the addition of regulatory bodies which *do not* oppose the delivery of conversion practices.

While some people may benefit from the support of psychotherapy and counselling to help them manage different issues they may have regarding their identity, it is crucial that they are not subject to psychological harm in the process. Current legislation does not protect people who experience conversion practices in counselling, therapy, coaching or instructing, particularly in unregulated spaces.

Clause 5 defines coercive behaviour for the purposes of the Bill. Is the definition sufficiently clear and workable?

Yes.

This definition is clear. Its adoption from other legislation strengthens its workability, as we already see it working in practice under the Domestic Abuse and Civil Proceedings Act (Northern Ireland) 2021.

Drawing on the approach taken to domestic abuse, it is proposed that a coercive course of behaviour in the context of conversion practices would be defined as:

- a) behaviour directed at the victim that is violent;
- b) behaviour directed at the victim that is threatening;
- c) controlling, regulating or monitoring the victim's day-to-day activities;

¹⁵ Ibid, F Ashe & D Mackle (2023) - [A Study of Conversion Practices in Northern Ireland](#)

- d) depriving the victim of, or restricting the victim's, freedom of action; or
- e) making the victim feel frightened, humiliated, degraded, punished or intimidated

We agree it is appropriate to draw on the same approach to domestic abuse cases in defining what constitutes a coercive course of behaviour.

Does the requirement that coercive behaviour must take place on two or more occasions provide an appropriate threshold for the offence?

Yes.

While the Coalition agrees that a course of coercive behaviour, by definition, would have to take place on two or more occasions, we believe that any occasion whereby a person is coerced into changing or suppressing their sexual orientation or gender identity is wrong and can cause lasting damaging harm.

We understand that Clause 1 would cover the provision of a conversion practice on one occasion, so we are content with the requirement in Clause 2 that the coercive behaviour must take place on two or more occasions. As previously stated, we wish to clarify that requiring a conversion practice to be a 'coercive' course of behaviour could constitute a consent loophole. Therefore, the separate offences for (a) providing conversion therapy or (b) engaging in coercive conversion behavior are vital to ensure a loophole free ban.

Clauses 6 and 7 define sexual orientation and gender identity, and set out when there is, or is not, intent to change or suppress sexual orientation or gender identity. Are these provisions sufficiently clear?

Yes.

We support the inclusion of both sexual orientation and gender identity, and believe that there is sufficient understanding of both of these terms within wider society and the judiciary to ensure that they are operationalised within this legislation. They are also drafted neutrally, so that this legislation does not solely apply to gay/bisexual/transgender individuals, but to everyone, as everyone in society has a sexual orientation and gender identity.

Additional identity definitions are not required in this Bill as it is ultimately about how those subjected to conversion practices are harmed, rather than how they identify, or about narrowly defining exactly which sexual orientations/gender identities are encompassed within the protections afforded by this Bill.

The Coalition has some concerns regarding the wording of Clause 7(1)(a), which states that "*there is no intent to change or suppress sexual orientation or gender identity if [...] there is no intent to **direct a victim towards a particular sexual orientation or gender identity***". We are concerned that, given that the intention of

the Bill is to capture both attempts to change and attempts to suppress sexual orientation or gender identity, this clause could be interpreted as excluding attempts to suppress an identity where the perpetrator does not *also* attempt to change that identity.

For instance, many sexual orientation/gender identity conversion practices focus not only on encouraging an individual to change their attraction or their identity, but also on encouraging them to not act on it. This may be accompanied by an acknowledgement of their sexual orientation or gender identity - the perpetrator may accept that the victim is, for instance, gay, but nevertheless coerces them into abstaining from sexual and romantic activity. It is vital that this Bill covers both change *and* suppression conversion practices, and we would encourage the Committee and the Bill sponsor to seek clarity on how this may be interpreted by the courts and the PPS.

Do these clauses provide sufficient protection for legitimate expression of beliefs or opinions, and for support which affirms a person's sexual orientation or gender identity?

Yes.

The Coalition is confident that Clause 7 provides sufficient safeguards for freedom of expression and belief, and for practices that affirm a person's sexual orientation and gender identity. These are:

7 (1) For the purposes of this Act, there is no intent to change or suppress sexual orientation or gender identity if—

(a) there is no intent to direct a victim towards a particular sexual orientation or gender identity,

(b) the intent is solely to express beliefs or opinions, without directing a victim towards a particular sexual orientation or gender identity

These safeguards would ensure that, for instance, a religious pastor or street preacher would not be subject to criminalisation under this Bill if they are reciting scripture or expressing their own personal belief on sexual orientation or gender identity. It also means that a trusted individual having exploratory, non-directive conversations will not be caught up within the scope of this Bill. This does not create new offences that restrict any freedom of religion or expression; instead, this Bill seeks to protect vulnerable individuals from harm and abuse.

It is worth noting that 'affirm' does not mean to encourage or direct someone towards a particular sexual orientation or gender identity. It does, however, mean

accepting and acknowledging how someone identifies and expresses themselves, even as that understanding of their identity may change or develop over time.

Clause 8 provides that psychological harm includes fear, alarm or distress. Is this definition appropriate and sufficiently clear for the purposes of the offences in the Bill?

Yes.

As referenced above, international research and evidence suggest that all conversion practices, irrespective of how they are delivered, are harmful, and that this harm may take years for a victim/survivor to fully recognise or accept. For this reason, we are concerned about the inclusion of the requirement for physical or psychological harm.

In the event that this requirement is included in the Bill, it is important that this may be interpreted as broadly as possible, so as to ensure that the courts and Public Prosecution Service can meaningfully implement the protections where some victims may not fully recognise the harm that has been caused to them. For this reason, we would support the inclusion of Clause 8; however, the Coalition would prefer that the harm requirement was removed altogether.

Clause 9 would amend the Magistrates' Courts (Northern Ireland) Order 1981 so that there would be no right to claim trial by jury for offences under clauses 1, 2 or 3. Do you agree with this approach?

Yes.

Clause 10 provides that the Act would come into operation 12 months after Royal Assent. Is this an appropriate period to allow for preparation and implementation?

Yes.

Please identify any specific amendments you would suggest, including the relevant clause where possible.

Whilst the Coalition recognises the many ways this Bill will act to ban conversion practices, we believe there are some key elements that require amendments to ensure a fully comprehensive, loophole free ban is delivered.

It is important to recognise that many of these practices occur within an individual's family, religious community, or wider circle, and as such they may be reluctant to report these practices to the police. These compounding demands on what are often traumatised individuals to take legal action against a provider are considerable. In addition, when bringing a legal case, a person may be required to

disclose their identity, undermining their privacy and alienating them further from their families and faith-based communities.

Other jurisdictions have introduced civil protection orders as a means of dealing with this, which are a method of recognising lower-level conversion practices through civil rather than criminal courts, and may be used to prevent practices before or during their delivery.

To address this concern, Belgium has introduced a process whereby arms-length bodies can take legal action against conversion practitioners, with the consent of the victim, removing the requirement for the victim themselves to initiate this process at great personal cost. This can be compared to the Spanish law, wherein these powers lie exclusively within a Government department (in this case, the Ministry of Equality), but have not seen similar prosecution rates to that of other jurisdictions.

Following this example, establishing or empowering existing bodies to take cases on behalf of the victim(s) and monitor and prosecute persons and organisations who perform conversion practices will ameliorate some of the effects of legal cases on victims/survivors. This currently works well within other areas of reporting crime in Northern Ireland; in the LGBTQIA+ sector there is a Hate Crime Advocate as part of the Hate Crime Advocacy Service which draws on this model to encourage reporting and support the victim when taking legal cases. We recommend that this Bill include these provisions as well as other measures to reduce the likelihood of individuals being subjected to conversion practices.

The Coalition would also welcome the development of an amendment focusing on banning the promotion or advertisement of these practices, to ensure that any promotional material around conversion practices would not be allowed to be published or distributed in the region. Other jurisdictions, such as some areas of Australia, Canada, Germany, and others who have progressed a ban on conversion practices, have also included within their bans efforts to tackle the promotion of these practices. This helps capture instances where individuals are encouraged, often through the distribution of 'self-help' guides, to self-administer conversion practices, or where individuals are encouraged through promotion to seek out conversion practices in a jurisdiction with fewer restrictions on their delivery. We understand that this is a reserved matter; however, we urge the Assembly to seek approval from the Secretary of State to include a ban on the advertisement of conversion practices in this Bill to ensure a fully comprehensive ban is delivered.

The Coalition also sees an opportunity in this Bill to increase the maximum sentence for offences, in line with those in the Westminster Bill, and increase sentences from 2

to 5 years. Moreover, when it comes to sentencing, it is worth noting also that some countries have applied an aggravated sentencing model, wherein an act which is already a criminal offence (for example, physical or sexual assault, harassment, domestic abuse, etc.) receives a greater sentence if it is conducted as part of a conversion practice. For instance, if a victim experienced so-called 'corrective rape' as a method of attempting to change or suppress their sexual orientation, the sentence for sexual assault should be aggravated by its use as a form of conversion practice. We recommend that this is considered as part of this Private Member's Bill.

Overall, the Ban Conversion Practices Coalition supports this Bill, and believes it is comprehensive and will go a significant way to ending these practices. The addition of these amendments would only strengthen it.

This response was prepared by:

Sophie Nelson
Senior Policy Development Officer
HERe NI

Alexa Moore
Policy and Public Affairs Manager
The Rainbow Project

Please get in touch if you would like to get in touch to discuss these issues in more detail.