

SUBMISSION

Evangelical Alliance's response to the Independent Review of Public Order and Hate Crime Legislation (England and Wales)

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Introduction

We welcome the opportunity to feed into this review both with a written submission and attending the 2 Marsham Street roundtable in early January.

The Evangelical Alliance UK is the largest and oldest body representing the UK's two million evangelical Christians. Established in 1846, today we represent a diverse constituency of over 28,800 individual members, as well as thousands of churches and hundreds of organisations located in each of the four nations. The Evangelical Alliance is the founding member of the World Evangelical Alliance, which unites evangelical alliances based in different countries around the world, representing circa 600 million evangelical Christians. This global reach reflects the influence of evangelical faith, which can also be seen in the huge social and ethnic diversity in British evangelical churches.

At a policy and parliamentary level, we have advised government ministers and have been consulted on different public order and/or hate crime strategic reviews in each of the four nations. For example, Northern Ireland Hate Crime Review 2019, The Law Commission Review in 2020, Hate Crime and Public Order (Scotland) Act 2021, Islamophobia Working Group and the Racial and Religious Hatred Act 2006.

A shared intent by policymakers was to use legislative levers to strengthen public safety and encourage tolerance and dialogue where there is strong opinion. But we would argue the legacy of different public order legislations is the opposite. Instead, we live in a more hostile and polarised society, both online and in person, compared to when the first public order legislation was introduced in 1936. Today extreme speech (both from the left and right) thrive at a time of civil unrest and volatility and those in the moderate middle find their freedoms targeted by both camps. This has been the experience of evangelicals living in Britain.

Evangelicals from a minority ethnic background experience violence and/or racism. Alternatively, evangelicals regardless of their ethnic, cultural or sex can experience hostility and misinformation regarding their theological beliefs on sexuality, sex, marriage or abortion

from the progressive left. At times hate crime legislation and law enforcement fail to defend evangelicals' freedom to hold and manifest beliefs or protect their personhood.

In our responses below we highlight where government legislations and policies have contributed to the polarisation and squeeze on religious minorities. Government and policymakers play a crucial role in reasserting freedom of expression **and** freedom to practise the fullness of one's religious convictions and beliefs in modern Britain is celebrated and welcome.

The timing of this Review is important and presents an opportunity to tackle the extremes within communities and our political discourse with the intention of bringing the nation together.

1. Your experience of protests, public expression and hate-related incidents

From your perspective, how have recent protests, public demonstrations, campaigns, or expressions of strongly held views (online or offline) affected the people or communities you work with or represent?

- What kinds of incidents or patterns concern you most, for example intimidation, harassment, hateful or inflammatory language, restrictions on protest, or policing approaches?
- Are there particular examples that illustrate how current law and practice work on the ground?

Protests and public demonstrations are freedoms worth upholding. However, their frequency and scale at times have descended into violence, where during summer of 2024 it felt like the precursor to civil uprising. Many of our member churches have been active in their response oftentimes in a climate of sustained fear and uncertainty to personal wellbeing. The activities of our churches over past 18 months represent a non-anxious presence in their communities including:

- A member church in Southport was involved in interfaith response and support to families and local community grieving the tragic killings and attacks.
- Member churches and community organisations from Liverpool, Belfast¹, Birmingham and the Northwest were the first and last response supporting business and individuals harmed and frightened by the 2024 riots.
- Evangelical church leaders from Rotherham have stepped up their interfaith engagement as a show of solidarity with Imams and mosques who encountered attacks and vandalism to their places of worship.

¹ Nathaniel Jennings for Evangelical Alliance website (October 2024), *How can we reconcile racial injustice as a church?*, <https://www.eauk.org/news-and-views/how-can-we-reconcile-racial-injustice-as-a-church>

- During the “operation raise the flag campaign” and the unhealthy rhetoric regarding immigration² over the summer, we have heard reports of Black, South Asian and mix-heritage church leaders and congregants feeling unsettled and fearful for their own safety in the communities they have lived and worked in for decades.
- And more recently, as an organisation we have presented to ministers, the police, government officials and parliamentarians on the co-opting of Christian language, iconography and the cross during public demonstrations (for example the Unite the Kingdom rally in September). In such meetings we are building awareness of evangelical theology, expression of faith and political engagement and seeking to help policymakers make a distinction between UK evangelicalism and Christian nationalism³, populism or worse white supremacy.

The rise of Christian language by the populist political right has caused many evangelicals to self-censor themselves either online or in-person for fear of being wrongly accused of fuelling community tensions and associated with campaigners seeking to divide communities for political ends.

Dame Sara Khan, the former independent advisor for social cohesion and resilience under the previous Conservative Government, produced a report examining the democratic resilience and the threat to social cohesion in Britain. In her report she coined a phrase “freedom-restricting harassment (FRH)” which perfectly describes the challenges ethnic and religious minorities confront online, in the workplace and/or going about their daily lives. Ms Khan described FRH as follows:

“Freedom-restricting harassment is when people experience or witness threatening, intimidatory or abusive harassment online and/or offline which is **intended to make people or institutions censor or self-censor out of fear**. This may or may not be part of a persistent pattern of behaviour.”⁴

At a time of such political and national instability we would urge the Review to be cautious in imposing further restrictions to movement, speech and demonstration. Legislation will not heal our nation but bringing communities together could achieve more.

Across the UK, we are aware of evangelical churches hosting “listening tables” in response to past year. These conversations designed to bring together individuals who are politically, or economically and socially disenfranchised with those from migrant backgrounds and elected officials responsible for change. The vision is to listen to one another and then together devise solutions that respond to local need.

² Rev Dr Israel Oluwale Olofinjana for Evangelical Alliance (September 2025), Who is my neighbour? The hermeneutic of love, <https://www.eauk.org/news-and-views/who-is-my-neighbour-the-hermeneutic-of-love>

³ Peter Lynas for Evangelical Alliance (September 2025), Christian nationalism in the UK: a contest for the nation’s soul? <https://www.eauk.org/news-and-views/christian-nationalism-in-the-uk-a-contest-for-the-nations-soul>

⁴ Dame Sara Khan DBE (March 2024), Threats to social cohesion and democratic resilience: a new strategic approach, https://assets.publishing.service.gov.uk/media/65fdbfd265ca2ffef17da79c/The_Khan_review.pdf- our emphasis

2. Clarity, fairness and accessibility of the law

How clear and fair do you consider the current public order and hate crime legislation to be for the people you work with and for the wider public?

- Are key concepts, such as harassment, alarm or distress, threatening or abusive behaviour, or stirring up hatred, well understood? If not, how might this understanding be improved?

Comment on Section 124 in Crime and Policing Bill

The bill is currently proceeding through the Lords and could quite possibly see further amendments before receiving royal assent. But we support the Government's policy intent to protect places of worship, especially at a time where vandalism to mosques and/or risk to terrorist incidents to synagogues is high. Further action that is needed is for policymakers to examine the effectiveness of public order bill keeping minorities and communities safe. There have been three or four Acts in recent years, and the majority of demonstrations have been less peaceful and veer towards violence towards police officers or members of the public.

Ministers, police and parliamentarians can do more to educate the public on their freedoms and responsibilities.

This point links with response given in question 3. There is a role for local and national politicians to educate the constituents on the policy intent of new law and how it will impact individual freedoms for the collective good.

Harassment, alarm, distress and abusive behaviour are words common to the English language but less understood in what speech acts or activity goes beyond the legal limit.

The questions and request we often receive from individuals or member organisations tend to be on what freedoms evangelicals have to share or express faith in public or in creating resources. There is a nervousness amongst our constituency that when sharing authentic faith based on the Bible, observers will view this as a way to offend and/or provoke another group of society. In response, we have produced guidance packs, host in-person roundtables or online webinars for local churches and individuals in the workplace and education on their freedoms to manifest belief on contentious issues whether online or in-person.

*Transformed*⁵, *Speak Up*⁶ and *Living for Jesus at Work*⁷ are a sample of our publications produced in recent years.

In the new year, we are hosting a webinar for church and organisational leaders from diaspora backgrounds on this Review. The webinar will seek to clarify legislation and also to outline the role leaders play in supporting individuals to report incidents of hate crime.

Stirring up hatred

Specific to “stirring up hatred” in our submission to the Law Commission’s 2020 review of hate crime legislation we expressed concern in its proposals in widening of the stirring up offences.

Our concern then and remains today is that the broadening of stirring up offences risks an erosion of freedom of expression. It is our view speech should be primarily protected through the law and only criminalised in circumstances where there is clear intent for it to lead to objectively defined harm, particularly in the form of violence. Disagreeable, offensive, and divisive speech should be explicitly protected through the law as priority and the test for criminality and prosecution should be objective, rather than subjective and based on offence.

- From your perspective, are there aspects of the law that are too broad or too narrow, or that do not reflect how harmful conduct, including online, is experienced in practice?

General comments on hate crime laws and practice

The Evangelical Alliance supports the law in its attempt to prevent violence and intimidation against vulnerable minorities. British evangelicalism is incredibly diverse, not only ethnically but across many other protected characteristics, while also itself representing a vibrant minority religion⁸. As such, we celebrate the diversity of British society and are grateful for the work of law enforcement in curtailing acts of violence and intimidation. However, based on the experience of evangelical Christians in the UK, we believe that aspects of “hate speech” legislation can in fact work against minorities (including evangelical Christians) more than they protect them.

⁵ Evangelical Alliance (second edition 2024), *Transformed*, a brief biblical and pastoral introduction to understanding transgender in a changing culture <https://www.eauk.org/resources/our-resources/reports/transformed-understanding-transgender-in-a-changing-culture/transformed-the-resource>

⁶ Evangelical Alliance and Lawyers’ Christian Fellowship (second edition 2021) *Speak Up – a brief guide to the law and your gospel freedoms*, <https://www.eauk.org/what-we-do/initiatives/speak-up>

⁷ Evangelical Alliance and Lawyers’ Christian Fellowship (2022), *Living for Jesus at work* – a collection of advice, wisdom and guidance, <https://www.eauk.org/resources/our-resources/reports/living-for-jesus-at-work>

⁸ If Official for National Statistics 2021 census states 46.5% (27.5 million people) identity as Christian, we would say those who would identify as evangelicals or practicing Christians is significantly less. The Evangelical Alliance have commissioned further research on number of evangelicals in the UK and will publish it’s findings end of 2026.

Our objections to aspects of current hate speech legislation are based both on principle and practice. The main purpose of legislation that restricts speech is, as Baroness Onora O’Neill argued in her 2015 Theos annual lecture, to prohibit certain speech-acts that have particular objective effects (e.g. incitement to violence or intimidation). It is not the purpose of such legislation to regulate the content of such speech, or to base regulation on more subjective categories such as offence.⁹ However, it is our view that hate speech laws increasingly encroach on the content of speech, based on subjective offence or controversy, in a way that undermines freedom of expression as enshrined in Article 10 of the European Convention on Human rights. Laws designed to prohibit such extreme examples of speech as incitement to violence have been used to threaten the expression of unpopular views which may simply offend the sensibilities of the time. However, in the famous words of Lord Justice Sedley:

“Free speech includes not only the inoffensive but the irritating, the contentious, the eccentric, the heretical, the unwelcome, and the provocative provided it does not tend to provoke violence. Freedom only to speak inoffensively is not worth having.”¹⁰

While the law itself may provide exemptions (such as are found in sections 29J and 29JA of the Public Order Act 1986), we are concerned that even the process of being reported or investigated for unlawful speech may itself have a chilling effect on controversial opinions, even when people are subsequently not prosecuted or acquitted by the courts.¹¹ For example, there are Christian street preachers, whose right to speak is protected by law, who have been wrongfully arrested, and subsequently offered compensation.¹² There are also those who, though innocent of hate crime, have been recorded in connection with “hate incidents” in a way which does not reflect their innocence under the law.

In addition, for evangelical Christians, freedom of expression is not a merely political issue but has great theological implications. We believe that speech is a mark of humans being made in the image of God, and our religious practice is intrinsically bound up with different forms of speech, from sung worship to public prayer to preaching in churches and on the streets and the production of content for the digital space. Restrictions on such speech, if deemed “hateful” could be a violation of conscience, with grave implications for Article 9 (on freedom of thought, conscience and religion) as well as Article 10 of the European Convention on Human Rights. We recognise that speech can be used for hateful or destructive ends but would note that the law may have a limited ability to restrict all such speech.

Given the concerns mentioned above about the treatment of those subsequently acquitted, we believe that the solution may not be in further legislation, but in religious literacy training

⁹ Onora O’Neill, Freedom of Religion and Freedom of Expression, (<https://www.theosthinktank.co.uk/cmsfiles/archive/files/Reports/Annual%20Lecture%202015.pdf>), see especially section 4, pp. 16-17, and section 6, pp. 19-20.

¹⁰ Redmond-Bate v DPP [2000] HRLR 249 at 260

¹¹ See for example the case of Harry Miller (<https://www.bbc.co.uk/news/uk-england-lincolnshire-51501202>).

¹² See for example this case: <https://premierchristian.news/en/news/article/street-preacher-receives-4-000-pay-out-for-wrongful-arrest>.

for police and wider public understanding about what relevant legislation can and cannot do.

3. Experiences of policing, prosecution and the justice system

Drawing on your experience or casework, how do the police and other authorities respond to public order and hate-related incidents?

- Are there examples of responses you would describe as sensitive, proportionate and effective?
- Are there examples where you consider the response inadequate, excessive or inconsistent, including differences between areas, communities or types of protest or speech?
- What helps or hinders people from reporting incidents, pursuing cases and obtaining support?

Perceived inconsistencies in policing, particularly on hot button issues

For over two years, there has been large scale protests and public demonstrations on the Israel and Hamas war in the Middle East. Most Saturdays it has not been a pleasant experience to walk amongst them. Chants of intimidation towards Jewish people, or “death to the IDF” have been commonplace for many of these demonstrations and yet they persist with minimal arrest. The MET police and Greater Manchester Police joint announcement this past week about “chants to globalise the intifada” will lead to an arrest using public order powers¹³ are a positive step but why the delay?

In comparison, there is a view amongst evangelicals that the police are swift to act and silence *individuals* speaking from the Bible or religious practice like prayer or worship in public is used.

Clause 9 of the Public Order Act 2023 saw the introduction of restrictive zones nearby abortion clinics. During parliamentary scrutiny, we, with other Christian and free speech campaign groups raised concerns that the language around “influencing a person’s decision” was too broad in scope and queried whether religious practice within a buffer would be in breach of clause. At the time we were reassured that it wouldn’t be. However, Ms Isabel Vaughan-Spruce silently praying within the 150 restrictive zone to Birmingham abortion clinic has been charged with criminal offence.¹⁴

¹³ Metropolitan Police (December 2025), *Joint statement from the Commissioner of the Metropolitan Police and the Chief Constable of Greater Manchester Police*, <https://news.met.police.uk/news/joint-statement-from-the-commissioner-of-the-metropolitan-police-and-the-chief-constable-of-greater-manchester-police-504494>

¹⁴ Telegraph (December 2024), *First person charged under new abortion buffer zone law*, <https://www.telegraph.co.uk/news/2025/12/17/first-person-charged-under-new-abortion-buffer-zone-law/>

Another example is evangelist Ollie Sabatelli who was issued Community Protection Notice restricting him from sharing in Surrey and Sussex for the “content he chose to preach and its amplified nature.”¹⁵

Both Ms Vaughan-Spruce and Mr Sabatelli’s might be considered nuisance to law enforcement but they both test the boundaries of the law and demonstrate how public order offenses not only restrict speech but restrict the freedom to practice and manifest belief. This is of huge concern to us and our members. Noone should be arrested for praying and reading scripture (amplified or not).

In the past year the Evangelical Alliance’s relationship with the National Police Chief Council is growing and presents an opportunity to instil cultural and religious understanding into everyday policing. We look forward to them contributing to our politics briefing on this topic with diaspora churches and church and organisational leaders.

Finally, we would argue non-hate crime incidents (NCHIs) – its resourcing, reporting and data collection does little to tackle actual crime or reduce hate incident. Instead, it further undermines public confidence in policing and politicians. We welcome early reports that suggest NCHIs will be scrapped entirely.

4. Impacts on individuals, communities and trust

How does the current framework, and the way it is applied, affect the people and communities you work with?

- Are there groups who feel vulnerable to intimidation, hate or public disorder, inadequately protected by the system, or unfairly restricted in their ability to speak, worship, campaign or protest and how do these experiences influence trust in the police, prosecutors, government and other institutions?
- Can you see any practical ways to address these issues or improve trust and protection for those affected?

According to the Office for National Statistics August 2025 survey into public perceptions of police and criminal justice, there is a general downward trend in confidence in local policing.¹⁶ In the above response we acknowledge the challenges police have to navigate when policing on contentious issues like migration, abortion and Israel/Hamas.

Another hot button issue currently in British society at the moment is the prominence of Islam in public life. The Government’s proposed Anti-Muslim Hatred/Islamophobia definition

¹⁵ Ollie’s Instagram where a recording of Police issuing the CPN, <https://www.instagram.com/reel/DPUeyYkDAwz/?igsh=MW93eGk5eXk1Z2dzZQ==>

¹⁶ Office for National Statistics (August 2025), *Perception and experience of police and criminal justice system, England and Wales: year ending March 2025*, <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/articles/perceptionandexperienceofpoliceandcriminaljusticesystemenglandandwales/yearendingmarch2025>

and responding to Islamist extremism. Distinct issues but with some overlap from perspective of hate crime and public order. In whatever the Review recommends to the secretary of state, we would argue it must provide a framework for robust discussion issues matters. More speech not less is needed and demonstrate why and how below.

Muslims within the UK have the same protections in law as evangelicals and other religious groups or not to practise belief in this country. Crucially freedom of conscience, thought and religion also gives freedoms to change belief. In the few cases we have been informed about where a Muslim converts to Christianity that individual does so either having to keep that decision secret for fear of bringing shame to family or risked exclusion from biological family and the wider Muslim faith community. **It might be worth considering what support agencies or police training exists to identify intra-faith hatred, violence¹⁷ or hostility?**

4,478 reported hate crimes¹⁸ in England and Wales to people perceived as Muslim are 4, 478 too many. Introducing a definition alone we believe will provide insufficient protections or deterrence. In our presentation and submission to the Working Group on Anti-Muslim/Islamophobia definition earlier this year, we advocated for three things. They were:

1. Do not conflate religion with ethnicity.
2. Anti-Muslim hatred” is preferred terminology as it identifies hostility, discrimination, violence or threatening behaviour to the *individual*.
3. Robust theological disagreement with Islam, damaging sacred texts and producing parodies of religious leaders¹⁹ – however offensive to some - is not hate speech in and of themselves.

Finally, the importance of responding to Islamist extremist ideology, groups and attacks in Britain. This is a matter for Government and policymakers to find legislative framework that identifies, prosecutes offenders and protects the public. This Review could support that effort by articulating the legal boundaries for healthy, and robust criticism of Islam (or any religion) and distinguishing that from discrimination and hatred.

5. Balancing freedom of expression and protest with safety and protection

In your view, does the current framework strike the right balance between:

- protecting freedom of expression, debate and protest, and
- protecting individuals and communities from intimidation, harassment, disorder and hate?

Where do you think this balance is working well, and where is it not?

¹⁷ OSCE Office for Democratic Institutions and Human Rights (2025), Understanding Anti-Christian Hate Crimes and Addressing the Security Needs of Christian Communities: A practical guide <https://odhr.osce.org/odhr/594847>, see case study on page 42.

¹⁸ Office for National Statistics (October 2025), Hate crime, England and Wales, year ending March 2025, <https://www.gov.uk/government/statistics/hate-crime-england-and-wales-year-ending-march-2025/hate-crime-england-and-wales-year-ending-march-2025>

¹⁹ Case of Batley Grammar School and teacher goes into hiding for caricature of the Prophet Mohammed <https://www.bbc.co.uk/news/uk-england-leeds-68659435>

- You may wish to refer to particular types of protest or speech, particular communities, or particular settings, for example around places of worship, schools, universities, local high streets or online platforms.

We would commend OSCE Office for Democratic Institutions and Human Rights (ODIHR) publication on *Understanding Anti-Christian Hate Crimes and Addressing the Security Needs of Christian Communities: A practical guide*.²⁰ Page 67 and 68 would be of interest to this Review as it sets out six practical steps policymakers and Government can take to responding to hate crime that impacts Christian believers.

6. Priorities for change, and any other issues the Review should consider

What changes, if any, would you like to see to improve the clarity, fairness and consistency of the law and its application in practice?

- This may include suggestions for legislative reform, improvements to guidance, training or oversight, better data and transparency, or changes in how authorities engage with communities and civil society.
- Are there specific examples, research, data or international practice that you consider particularly important for the Review to look at?
- Is there anything else you wish to bring to the Review's attention that has not been covered by the questions above?

A recommendation to the Review is improving data collection of hate crime incidents. At present data only describes the prevalence of hate crime across the protected characteristics. It does not sufficiently explain motivation, trends or causality for why hate crime incidents happen or identify responses in education or community level to reduce it. It has long been our view that the Government and statutory bodies must conduct a nation-wide research and audit of religion or belief in the UK and how the belief impacts on people's lives and engagement in society. Such research could draw together an advisory group made up of representatives from different faith groups. Government and statutory bodies should rely on the insights of religious groups to develop policy that appropriately responds to need and protects freedoms.

Our final remark and query to the review's Chair is to ask whether the review will consider the subject of extremism and a definition in your recommendations on public order and hate crime legislation? If so, we would caution against explicitly stating the Bible or its teachings as a text that incites hatred towards other protected groups.

Under the previous Conservative Government, the then secretary of state for Housing, Michael Gove proposed a definition: *"the promotion or advancement of an ideology based on violence, hatred or intolerance that aims to negate or destroy the fundamental rights and*

²⁰ OSCE Office for Democratic Institutions and Human Rights (2025), *Understanding Anti-Christian Hate Crimes and Addressing the Security Needs of Christian Communities: A practical guide* <https://odihr.osce.org/odihr/594847> Please note this publication is in a series and their equivalent reports for understanding Antisemitism and Anti-Muslim hatred.

freedoms of others; undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or intentionally create a permissive environment for others to achieve [this]."

Extremism is a threat to global stability and national security. As an organisation we are available to support the Government in its understanding of religious nationalism and the use of violence to intimidate minorities and destabilise liberal democracies.

There is a shared concern amongst evangelical alliances internationally in how progressive Governments' reforming public order legislation tend to do so by reducing freedoms for religious minorities in that country. For example:

- In Canada there are proposals in Bill C-9 to remove religious speech defence from hate speech law.²¹
- In Finland, Päivi Räsänen, a former government minister is awaiting trial at the Supreme Court following seven-year case for posting bible passage on Twitter in response to question on sexuality²².
- Within a UK context and when the Scottish Government were introducing its own hate crime bill, we raised similar concerns regarding a vague and broad definition of 'hate' that it would fail to protect religious minorities and would capture define holy scriptures and doctrines as acts worth criminalising.

We commend the World Evangelical Alliance's (WEA) 2019 submission²³ to the United Nations where their response draws on learning from 143 national alliances and outline the "adverse impact that anti-hate legislation can have on legitimate religious expression." A paragraph of interest to the Review that sets out a global trend with hate crime legislation and warning to how Governments can become implicit in fuelling discrimination towards minority groups.

"We (WEA) have identified a pattern that leads up to outright persecution. This pattern generally starts with **disinformation** and hate speech. Once the society accepts the disinformation and spread of **hatred towards the religious group, policies of discrimination are facilitated. Discrimination is then followed by persecution.** Clearly, hate speech can be dangerous for those it targets."²⁴

End

²¹ CBC News (December 2025), *Liberals back Bloc's proposal to remove religious exemption from hate speech law*, <https://www.cbc.ca/news/politics/government-bill-religious-exemption-hate-speech-9.7009646>

²² ADF UK (August 2025), *'Hate Speech' Case over bible tweet dragged into 7th year as Finnish Supreme Court sets hearing date for 30 October*, <https://adfinternational.org/en-gb/news/hate-speech-case-over-bible-tweet-dragged-into-7th-year-as-finnish-supreme-court-sets-hearing-date-for-30th-october>

²³ World Evangelical Alliance (2019), *The Paradox of Hate Speech Legislative restrictions*, <https://un.worldidea.org/report-the-paradox-of-hate-speech-legislative-restrictions/>

²⁴ Ibid – **our emphasis**