



Lesbian, Gay & Bisexual Alliance Cymru
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12 July 2026

Ms. Helen Horton
Chair
Amnesty International UK Charitable Trust

Mr. Sandy Ruthven MBE
Chair
Amnesty International UK Charitable Trust

Amnesty International UK 2nd Floor
Peter Benenson House
1 Easton Street
London
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By Email

Dear Ms. Horton and Mr Ruthven

Re: Your publication “A Growing Threat – The Anti-Rights Movement in the UK” (8th July 2026) (Hereafter “your publication”)

Publication

1. We write with reference to your publication which appears to have been published on your international and UK websites (respectively <https://www.amnesty.org/en/> and <https://www.amnesty.org.uk/>) on 8th July 2026 before its removal on 10th July 2026. We trust you retain a copy but can provide one for your convenience if necessary.

2. We note that you are a well-established and well-funded charity with international reach, significant influence and many full-time staff. This is a letter on behalf of LGB Alliance Cymru, a grassroots, volunteer, activist group dedicated to fighting homophobia in all its forms, including such as emanates from the third sector.
3. This is an informal letter (at this stage) to object in the strongest terms to your publication which refers to us explicitly on page 22. In summary, your publication:
 - a. Makes the explicit, false and malicious assertion the LGB Alliance Cymru is “anti-rights”.
 - b. Targets a number of lesbian and gay advocacy organisations exercising legally protected gender critical speech rights (with whom you do not agree) in a table entitled “Anti Rights Organisations Identified”.
 - c. Libels other groups such as Genspect¹ by falsely attributing to them a categorisation of “type” “Conversion Practice” in the table entitled “Anti Rights Organisations Identified”.
 - d. Appears to suggest or imply LGB Alliance Cymru and other groups are anti-abortion.
 - e. Recommends on page 15 that the Charity Commission engage in unlawful belief discrimination contrary to the Equality Act 2010.
 - f. Recommends on page 15 that those awarding grants/funding engage in unlawful belief discrimination contrary to the Equality Act 2010.

Summary

4. We believe your “report” to be an unserious smear designed to delegitimise political opponents. Having once protected dissenters in politics, we take the view Amnesty is now in the business of harassing and defaming gay men and lesbians who express political views it does not like. We take the view your report is a deeply silly and malicious piece of low politics designed to “evidence launder” a list of undesirable gay and lesbian political actors such that it can be quoted by those who seek, (like you) to control gay and lesbian free speech and open discourse. For the avoidance of any doubt on the matter, we consider this report suggests that institutional homophobia has taken root in your organisation and is thriving.
5. Beyond falsely and maliciously labelling LGB Alliance Cymru “Anti Rights” we note you also target a number of women’s groups, including (remarkably) “Beira’s Place” which is an establishment funded entirely by donations dedicated to helping female victims of serious sexual violence. We are surprised at this.

¹ Row 22, Page 18, Your Publication

6. By slandering decent organisations who try to help detransitioners or struggling parents as practicing “conversion therapy” we take the view you are clearly breaking the law inasmuch as you are publishing to your wide audience an unambiguous libel. While we do not speak for those organisations, we take the view this is an abuse of your position and urge you consider a full retraction and apology to them.
7. Further, it cannot be right for a UK Charity to recommend that its regulator (the charity commission) and those awarding funding break the law by engaging in belief discrimination. Again, this is a clear abuse of the latitude you appear to enjoy with your regulator and your powerful position as a UK and International Charity. All charities have a duty to observe and further the rule of law. Your encouragement to flout it the law is unusual for a such a large and established organisation.
8. We deal specifically with the false and defamatory material in your report specifically directed towards LGB Alliance Cymru.

Reference in law

9. At page 20 of a table entitled “Anti Rights Organisations Identified” the following entry appears:

LGB Alliance Cymru	Gender Critical	Informal	2019
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We take this to be a reference to our group and consider that that any reasonable reader would understand it as such in the context of the table and wider context of the publication.

Particulars of false statement linked to the phrase “Anti Rights”

10. As LGB Alliance Cymru features in a table entitled “Anti Rights Organisations Identified”, a reasonable reader would derive their understanding of the term “anti rights” from the whole of the document. The term “anti rights” is explicitly dealt with in a section of your publication entitled “What are anti-rights actors?²” the following is stated (emphasis added):

² Page 4, Your Publication

“Amnesty International UK defines anti-rights actors as formal and informal groups, individuals, private and state actors whose aim is to restrict human rights by undermining human rights protections in law and practice”.

We note:

- (a) that this is a statement explicitly made on behalf of your organisation as it is named.
- (b) the words “Anti Rights” are defined as an aim to restrict human rights and undermine human rights protections. We take it as self-evident that a reasonable reader would form a negative view of a party described as “Anti Rights” (as the explicit suggestion is such a party seeks to harm others rather than engage in nuanced debate as to balancing rights).
- (c) LGB Alliance Cymru positions itself as defending gay rights and numerous publications and speeches speak directly to the question of safeguarding and strengthening the human rights of lesbians, bisexuals and gay men.
- (d) To suggest the LGB Alliance Cymru is trying to restrict or undermine human rights is false and capable of causing serious harm to our reputation.

11. We are reinforced in that view by the following paragraph which reads (emphasis added):

“Some of these groups describe themselves as ‘anti-gender’ because they visibly oppose the rights and equality of women and LGBT+ people. However, by targeting women and LGBT+ people, they also challenge a fundamental human rights principle: that human rights belong to everyone equally. Human rights are interconnected and mutually reinforcing. When the rights of one group are restricted, protections for others can also be weakened, even where the effects are not immediately visible”.

We note:

- (a) LGB Alliance Cymru has produced publications and responded to policy initiatives at a UK and Welsh government level explicitly opposing gender ideology from the perspective of lesbians bisexuals and gay men. We think it reasonable that a reader would consider us to be “anti-gender” within the meaning of this paragraph.

- (b) That Amnesty International appear to be equating opposition to gender ideology with both misogyny and homophobia. We take the view this an unserious and false suggestion.
 - (c) To the extend that it is suggested LGB Alliance is homophobic and misogynistic this is false and capable of causing serious harm to its reputation.
12. Amnesty International then go on to conflate these issues with an abortion debate more relevant to its USA audience in the following terms (emphasis added):

“Protections relating to bodily autonomy and sexual and reproductive rights have always been contested. However, over recent years, attempts to restrict these rights have achieved significant political and legal successes. Regressive developments in the United States, including the overturning of Roe v. Wade in 2022 and a series of discriminatory laws targeting trans people, have had an international impact, influencing political debates and campaigns in other countries. For example, anti-abortion groups in the UK have increased their activities, contributing to greater harassment outside abortion clinics.

Because these groups challenge core human rights principles, Amnesty International UK uses the term ‘anti-rights’ to describe their aims and impact.”

We note the following:

- (a) This paragraph features directly after the last dealing with LGB matters and would be taken by a reasonable reader to be a part of the description of “Anti Rights” groups.
- (b) This paragraph features under the heading “What are anti-rights actors?”
- (c) This paragraph ends with the words “these groups” and appears to draw no distinction between the issue of abortion and the debate around gender ideology.
- (d) Although, as an organisation comprised of LGB people and dealing exclusively with their concerns LGB Cymru has no position on abortion and has never issued any publication on the matter, individual members have been active in the fight against anti-abortion groups.
- (e) Any suggestion to the contrary is false, malicious and capable of seriously harming the reputation of LGB Alliance Cymru.

The misunderstanding of the term “gender ideology” in your publication

13. Your publication misunderstands the term “gender ideology³” by saying it is a strict belief that men and women must adhere to rigid gender roles. That is a dated and

³ Page 5, Your Publication

distorted understanding perhaps more relevant to some USA contexts. In modern parlance, gender ideology is understood to be the belief that humans possess an unprovable, separate gender essence sometimes compared to a soul that can be mismatched to a human body by an errant creator. This is unambiguously the understanding of English and Welsh law on the subject, see *Forstater v GCD*⁴ for further reading.

14. This matter is relevant insofar as your publication makes passing reference to “anti-gender” groups (see paragraph 11 above). We take that phrase to mean “anti-gender ideology”.

Conclusion on defamatory statement in your publication

15. Your publication contains false and defamatory statement about LGB Alliance Cymru because:

- a. LGB Alliance Cymru is listed in a table of groups said to be “anti rights”
- b. You explicitly define “anti rights” to mean
 - i. A desire to restrict or undermine human rights
 - ii. A political outlook informed by misogyny and homophobia
 - iii. A proximity to anti abortion groups
- c. These statements are false because
 - i. LGB Alliance Cymru works explicitly to safeguard the human rights of LGB people, in particular the rights of young lesbians and gay men to grow up experiencing puberty and opposition to homophobia in gender medicine
 - ii. LGB Alliance Cymru is neither misogynistic nor homophobic. We are same sex attracted men and women and the implication is, frankly, unfathomable.
 - iii. Abortion is not a topic we have spoken about but if we did we would not be supporting a far right evangelical position.
- d. These statements are defamatory and capable of causing serious harm because while the statements are self evidently ludicrous, Amnesty International has huge organisational and institutional power, significant reach and is well respected. A report such as this could easily be quoted or cited by readers relying in good faith on what is written.

⁴ UKEAT/0105/20/JOJ

Resolution of defamatory matters

16. We note Amnesty International wisely removed this report from its websites on 10th July. We ask for a clear apology to us for the contents of this report in terms that address the particulars of the libel we have identified. For the avoidance of doubt, we would expect such an apology to be unreserved and to state that the Amnesty International apologises for and retracts any suggestion LGB Alliance Cymru is an “anti rights” actor.
17. It is a matter for the governance of Amnesty how this matter is dealt with and what organisational learning comes of it. We would think it wise for any organisation in your position to consider carefully and review the processes by which a document featuring libel and a recommendation to regulators and funders to engage in unlawful discrimination ever came to be approved or published.
18. Should you fail to apologise as is justified and right in the circumstances, we will have no choice but to consider further remedies.

Regulatory concerns

19. Charities in the United Kingdom must make Serious Incident Reports under the general architecture of the Charities Act 2011 and associated legal and procedural instruments. We draw your attention to the definition of a serious incident (Emphasis added):

“(A Serious Incident is) an adverse event, whether actual or alleged, which results in or risks significant:

 - harm to your charity’s beneficiaries, staff, volunteers or others who come into contact with your charity through its work
 - loss of your charity’s money or assets
 - damage to your charity’s property
 - harm to your charity’s work or reputation”
20. We take it as obvious that libelling gay rights activists and wholly innocent parties as conversion therapists is an adverse event which in our judgment has resulted in significant harm to your reputation. As the obligation to self-refer is that of your trustees, we remind them of these provisions which they will no doubt consider if they are not already following the removal of your publication from your websites. We will, in any event, be circulating a copy of this letter to the Charity Commission.
21. We also note the Commission’s frequent and consistent guidance to charities that attacking other charities on the register is not approved of and would remind your trustees of that guidance in view of how many registered charities feature in the table of “anti rights” groups.

Conclusion

22. We note that Amnesty unsuccessfully intervened in the case of *For Women Scotland v The Scottish Ministers*⁵. In that case at paragraph 206 the law Lords ruled that the case Amnesty supported would have rendered the protected characteristic of same sex orientation “meaningless”. Amnesty has now compiled a report in which LGB Alliance Cymru is libelled, but we note with great concern so too were the LGB Alliance, the Gay Men’s Network, LGB Christians, Lesbian Strength and the Lesbian Project. We are serious when we say that Amnesty should give consideration to whether it has become an institutionally homophobic organisation because it now appears to be opposing the lesbian intervenors in the Supreme Court, libelling gays and lesbian and creating lists of dissident gays and lesbians in a fashion reminiscent of the more oppressive regimes Amnesty might once have railed against.
23. As we hope this letter makes plain, we will not sit idly by while your influential and well-funded organisation smears decent gay men and lesbians who are deeply concerned at our rights becoming “meaningless” because you appear to have uncritically accepted gender ideology. If you target and attack us in this fashion, you can expect many more letters of this kind and further appropriate action to seek remedies at law. As your false and unwarranted attack on us was public, this letter will also be public and published.
24. We trust you will give this matter your urgent attention and await your response.

Yours Sincerely,

The Founders of LGB Alliance Cymru

Dee McCullough

Sarah Tanburn

⁵ For Women Scotland Ltd (Appellant) v The Scottish Ministers (Respondent) UKSC/2024/0042