

Dear William Shawcross (Chairman of the Charity Commission)

A recent investigation by clinical scientist Les Rose has highlighted a number of disproven treatments promoted by organisations that are charities registered with the Charity Commission, including charities that discourage vaccination, encourage the use of homeopathic remedies for serious conditions, and promote 'energy healing'. In promoting disproven treatments, these charities – including the Vaccination Awareness Network, Maun Homeopathy Project, Gentle Touch Healing, and the Keys College of Radionics – do not operate for the benefit public and therefore should have their charitable status revoked.

Charities like these, whose explicit aim is the promotion or supply of disproven treatments, concern us greatly. The status of these organisations as registered charities confers undeserved legitimacy upon them. Each of these organisations presents a clear risk to members of the public, both in the UK and overseas. Not only do these charities represent a waste of donations, they encourage vulnerable people to take treatments which are not effective and can cause harm if used in place of effective treatments. That these charities are allowed to continue operating with charitable status shows, we believe, that the Charity Commission has failed in its duty to protect the public.

The Charity Commission's duty in this matter is clear. The Charities Act 2011 outlines a 'public benefit requirement' for charities, stating that "a (charity's) purpose must be beneficial" and that "for a purpose to be charitable it must be beneficial in a way that is identifiable and capable of being proved by evidence where necessary". The Act also states that in order to deem a purpose to be in the public benefit, "the commission may need to ask for evidence of... the healing benefits of a therapy provided under an advancement of health purpose"<sup>1</sup>.

A charity whose purpose is the promotion of disproven therapies and treatments for which there is no reliable evidence cannot be of benefit to the public. As the public benefit test states, where there is no evidence that an organisation's purpose is for the public benefit, the Commission will not consider the organisation to be a charity, and would remove the organisation from the register of charities.<sup>1</sup>

Finally, the public benefit test states that "any detriment or harm that results from the purpose (of the charity) must not outweigh the benefit". Clearly, where a charity's purpose does not demonstrate any benefit to the public, any potential harm is sufficient to fail the public benefit test. The test states that a judgement on harm "will be based on evidence, not on personal views."<sup>1</sup>

Since July 2014 complaints have been made about a number of charities who promote dubious 'health' practices. We are dismayed that the Charity Commission has apparently taken no effective action to address these complaints. This reluctance to act represents a failure in the duty of the Commission to protect the public from organisations which promote potentially dangerous disproven treatments.

We call upon the Charity Commission to take seriously its responsibility to ensure that charities are operating in the public interest, and to re-evaluate the public benefit of charities which promote disproven therapies. It is the duty of the Commission to ensure that organisations which put the

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<https://www.gov.uk/government/publications/public-benefit-the-public-benefit-requirement-pb1/public-benefit-the-public-benefit-requirement>

public in harm's way are not given undeserved credibility nor other benefits that accrue from charitable status.

We also call upon the Commission to follow the procedures outlined in the Charities Act 2011 and to revoke the charitable status of those charities which cannot prove they meet the public benefit requirement. In particular, the Commission should review the charities named above and highlighted in complaints made by Les Rose.

If the Commission cannot take this duty seriously, and ensure charities meet the requirements of the Charities Act 2011, then there must be a full inquiry as to why the Charity Commission is apparently unwilling or unable to fulfil their statutory duty.

*Signed*

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- **Dr Susan Bewley**, Professor of Women's Health, King's College London
- **Dr Danny Chambers** BVSc MSc MRCVS, Veterinary Surgeon
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