

Original citation:

Kettell, Steven, 1973-. (2013) I Do, Thou Shalt Not : religious opposition to same-sex marriage in Britain. *The Political Quarterly*, Volume 84 (Number 2). pp. 247-255. ISSN 1467-923X

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I Do, Thou Shalt Not: Religious Opposition to Same Sex Marriage in Britain

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ABSTRACT

Proposals to legalise same-sex marriage have provoked one of the most high-profile and controversial political debates in recent years. The plans, being introduced by the governments at Westminster and Holyrood, have divided political and public opinion and have attracted widespread opposition from religious groups. However, while religious attitudes to homosexuality are shaped by theological concerns, religious justifications have been largely absent from the case against same-sex marriage. Instead, religious groups have presented their arguments in secular terms centred on tradition, social utility, democratic values and the threat to religious rights and freedoms. This particular framing of the issue reflects processes of secularisation, a growing use of identity politics and the composition of religious groups themselves.

KEYWORDS

Same-sex marriage, religion, discourse, theology, secularisation, identity politics.

An indecent proposal?

Proposals to legalise same-sex marriage in England, Scotland and Wales have provoked one of the most high-profile and contentious political debates seen in recent years.¹ Its origins are to be found in measures taken by the governments of New Labour, most notably the introduction of Civil Partnerships in 2005, which allowed same-sex couples throughout the UK to enter into officially recognised unions with full legal rights. Although ceremonial provisions were initially limited to civic premises, a change in the regulations for England and Wales extended this to religious buildings (with the permission of the organisation involved) in December 2011. Plans to legalise same-sex marriage, set-out on the grounds of equality and human rights, were first announced by the Scottish government in September

2011.ⁱⁱ The following month the Prime Minister, David Cameron, announced in his speech to the Conservative Party conference that the Coalition government at Westminster intended to follow suit. The announcements were accompanied by two public consultations. The first, in Scotland, attracted more than 77,000 responses. The second, in England and Wales, attracted more than 228,000 responses; the highest ever for a government consultation. At the present time, the measures are progressing to their respective statute books. In Scotland, a consultation on the Marriage and Civil Partnership (Scotland) Bill was introduced in December 2012, and will conclude in March. In England and Wales the Marriage (Same Sex Couples) Bill was introduced in January 2013 and cleared its second reading in the House of Commons the following month by a margin of 400 votes to 175. Both Bills are expected to become law later this year.

The proposals have been intensely controversial. Despite cross-party support at Westminster, pressure from the right of the Conservative party has put the Prime Minister's position under strain, and more than half of all Conservative MPs voted against the government at the second reading of the Bill in February. Trends in public opinion also reveal splits. A British Social Attitudes survey in 2008 reported that same-sex marriage was opposed by 62.6% of respondents, and a more recent ComRes poll, from February 2012, put the figure at 70%. The consultation conducted by the Scottish government found that 67% of respondents were opposed to changing the law to allow same-sex marriage, with 32% in favour. Other polls have produced more ambiguous findings. A 2011 survey by Angus Reid found that support for defining marriage as being between two people (rather than just a man and a woman) had increased to 45%, from 42% a year earlier, with the proportion opposed falling from 47% to 46%. A 2012 YouGov poll was also evenly divided, with 46% in favour of same-sex marriage and 49% opposed (28% supported civil partnerships but not marriage, and 21% opposed both). In the Westminster government's consultation, 53% of respondents agreed

that all couples, regardless of gender, should be able to have a civil marriage ceremony, with 46% opposed.ⁱⁱⁱ

The most consistent and concerted opposition to the proposals has come from religious organisations. While some groups, such as Quakers and Unitarians, have stated their approval, the vast majority have been strongly against. One reason for this is that religious attitudes to issues of homosexuality are strongly shaped by theological concerns. This is especially the case for scripturally-based, doctrinal forms of religion, such as Christianity and Islam, which place strong emphasis on moral issues, particularly those relating to sexual matters, and which tend to treat homosexuality as sinful and morally debased.^{iv} As such, the issue of same-sex marriage is a particularly incendiary one for religious groups; going to the very heart of their foundational beliefs as well as their sense of identity as moral communities. Theological differences also produce variation. Research from the United States shows Jews, Catholics and the religiously unaffiliated to have the most liberal attitudes on the subject, with Evangelical Protestants proving to be the most conservative. Research into UK attitudes has also found divergence. A recent ComRes survey of Christians reported that 83% were opposed to same-sex marriage, with most opposition coming from Catholic and Pentecostal denominations. A study into the attitudes of evangelical Christians similarly found that 73% believed homosexual acts were always wrong, with just 16% disagreeing. Other research has found that non-religious people, and, albeit to a lesser extent, Catholics, have tended to be the most liberal on the topic of same-sex marriage, with Anglicans, other Christian denominations and non-Christian faiths tending to be the most conservative.^v

While religious attitudes to same-sex marriage are closely linked to theological issues, religious opposition to the proposals of the Scottish and Westminster governments has been notable for its limited use of theological justifications. For the most part, specifically religious reasons against same-sex marriage have been altogether absent, or have been

significantly downplayed in public presentations of the oppositional case. Instead, this has centred primarily on secular arguments based on tradition, social utility, democratic values and the threat to religious freedoms and liberties^{vi}

Religious opposition

Theological arguments have been comparatively rare in the debate on same sex marriage, and their explicit use has been limited to a small number of relatively minor groups. Amongst these is the Free Presbyterian Church of Scotland, which claims that same-sex marriage is 'subversive of Christian morality', and 'forbidden by the law of God' which 'specifically condemns homosexuality'. In similar fashion the charity Christian Watch has also placed a strong emphasis on the sinfulness of homosexual practices, describing them as a 'perversion', and declared in its formal submission to the Scottish government that 'No Bible believing God fearing Christian organisation would allow practising homosexuals in their fellowship'. The charity, Christian Contact, followed the same line, favourably quoting Leviticus in its depiction of homosexuality as 'an abomination' and as just cause for being 'put to death'. Oppositional arguments from the evangelical group, Christians in Action, were also strongly theological, stating that: 'Biblical Christianity clearly defines the union of the same sex as sin and Inappropriate'. Other organisations, such as REFORM and Anglican Mainstream, presented a broader set of justifications for their opposition (with the latter contending that its reasons 'do not rest solely on religious faith') but nonetheless placed greater weight and

emphasis on theological concerns. The stated aim of the former was to promote an avowedly 'Biblical definition of marriage'.

Two of the main campaign groups opposing same sex marriage, Keep Marriage Special and RealMarriage.org.uk, have also been explicit in their theological orientation. The latter, organised by the Evangelical Presbyterian Church of England and Wales, described the proposals as being 'in defiance of God's moral authority' and declared that its opposition was based 'on the Bible alone'. The former, which is run by the Church Society, hosted an online petition calling on supporters 'to defend the biblical definition of marriage', and similarly maintained that: 'The primary argument against the proposed redefinition of marriage is therefore theological: what God has ordained in his written word, neither society nor any government is free to redefine'. Representatives of minority faiths, too, have tended to frame their objections in overtly religious terms. Most notably, a campaign launched by the Muslim Council of Britain, called Muslims Defending Marriage, explicitly based its defence of heterosexual marriage on Islamic teachings. Utilising select quotations from the Qu'ran for this purpose, the campaign website claimed that marriage was driven by 'divine guidance' and had been 'defined by Allah'.^{vii}

For the large majority of religious groups, however, theological reasons for opposing same-sex marriage have been limited and moderate in nature. To the extent that they have been deployed at all, such arguments are embedded within, and subordinated to, a variety of secular reasons. These revolve around a number of core themes. The first of these is an emphasis on historical and traditional sources of authority for the definition of marriage as a

'natural' and explicitly heterosexual category, typically enjoined for the purposes of procreation and raising a family. Marriage between one man and one woman is hereby presented as a universal constant in all human societies, and, as such, changing the definition of marriage is said to be beyond the purview of the state. The second and related theme emphasises the social utility of 'traditional' marriage. This is said to provide the bedrock for human society, forming the principal basis for social cohesion, order and stability. As such, opponents have claimed that same-sex unions will undermine marriage as an institution, with far-reaching and negative social consequences, including greater family breakdowns, rising levels of delinquency and the possibility that marriage will be further redefined to include other forms of relationship such as polygamy.

The third set of common assertions maintains that the legalisation of same-sex marriage is neither wanted nor needed. Here, opponents have highlighted the lack of a democratic mandate for introducing the proposals, pointing out that none of the main parties included it in their general election manifestos, and claiming that the official consultations (especially that conducted by the Westminster government) have been improper and biased; being constructed to consider how, but not if, same-sex marriage could be introduced. Opinion poll surveys showing public opposition to the measures, most commonly the 2008 BSA figures and the 70% ComRes result, have also been frequently cited. Alongside this, opponents add that same-sex couples can already obtain all the legal benefits of marriage through civil partnerships, and that permitting them to marry is not therefore a necessary step to achieve equality.

The final, and for many the most important, aspect of the case against same-sex marriage has focused on the issue of discrimination, and on the rights and liberties of religious groups and individuals. In particular, opponents claim that redefining marriage at the behest of a small

and activist minority will discriminate against people who wish to belong to, and continue to proclaim the virtues of, an exclusively heterosexual institution, and, as such, poses a serious threat to religious freedom.^{viii} Government reassurances that legal action will not be taken against individuals defending 'traditional' marriage, and that religious institutions will be similarly protected from being forced to conduct same-sex marriages (set out by the Westminster government in January 2013 as a 'Quadruple lock'), are said to be of dubious worth. The prospect of a legal challenge being brought under the European Convention on Human Rights, against which the government would be powerless, is frequently highlighted. These arguments have featured prominently in public opposition to the proposals put forward by the majority of religious groups. Opposition from the Church of England, for example, has been notable for the relatively moderate nature of its theological claims. The Church's submission to the Westminster consultation declared that its view of marriage was 'derived from the teaching of Christ himself', and a statement from its Evangelical Council asserted that the Church's freedom of manoeuvre on the issue was 'limited by the word of God in Holy Scripture', but beyond this its oppositional case has rested, for the most part, on secular justifications. Amongst the central assertions here are that the proposals would alter the 'intrinsic nature of marriage' as an institution existing 'since before the advent of either church or state', would 'entail a dilution in the meaning of marriage for everyone', and would 'be divisive and deliver no obvious legal gains given the rights already conferred by civil partnerships'.

This aversion to theological language has extended to other national institutions as well. The submission from the Church of Scotland (notwithstanding its proclaimed desire to shape public policy in 'the will of God') was principally framed around a variety of legal and technical matters, most of which centred on internal church processes and procedures for resolving disputes. The central point was that the proposals lacked legal protections against further extensions and would 'impinge upon core areas of the Church's beliefs, worship and discipline'. In like fashion, the submission of the Scottish Episcopal Church limited its theological claims to stating that heterosexual marriage was 'instituted by God', and focused largely on technical matters of process. The Baptist Union of Scotland, too, despite references to a 'Biblical world view', centred mostly on issues of religious freedom and on calls for a separation of church and state. The Scottish Christian Party deployed a moderate number of theological issues, mostly relating to Biblical edicts on sexuality, but embedded these within a variety of other points, most of which centred on the rights of Christians and on the assault by an 'aggressive' homosexual lobby. The theological language of the Orthodox and Methodist Churches was more restricted and ambiguous still. In the former this remained limited to brief references, placed at the very end of its submission, to 'divinely-inscribed patterns of human relationship'. In the latter marriage was described as a gift from god 'in line with scripture and traditional teaching', but the focus remained primarily on secular concerns. Opposition from the Church in Wales was even more secular, centring principally on the nature of the consultation process, and expressly stating that the purpose of

its submission was 'not to engage in the debate about the nature of marriage, or the recognition of same-sex relationships, from a theological perspective'.

Many religious, or religiously-based organisations, made no mention of theological issues at all. Submissions from the Christian Institute and the pro-life Society for the Protection of Unborn Children, for instance, both eschewed the use of theological references; with the former focusing instead on the discrimination of Christians and the threat to religious freedom, and with the latter centring on the institution of marriage as a means of keeping children safe, and on the alleged health problems of same sex unions. The Christian social reform organisation, Jubilee, made a more secular case still, and explicitly rejected the use of theological arguments. Setting out 'a non-religious case for retaining the current legal definition of marriage', it noted, in avowedly Rawlsian fashion, that 'plural democracy will only survive if we also offer each other reasons we can expect each other to share'.^{ix} The point was also well made by the charity, Christian Action Research and Education. Setting out the range of secular arguments to be deployed against the proposals, it observed that: 'The challenge facing Christians who do not believe that same-sex marriage is part of God's purpose for society, is defending the current legal definition. This depends on having good non-religious arguments'.

Other organisations crafted a clear public/private distinction in their use of theological claims. Christian Concern, for example, made no theological justifications in their submission on the proposals, centring instead on issues of religious rights and freedoms, but highlighted strong theological themes, including overt references to Jesus, to marriage as a

'gift from God' and to the sinful nature of homosexuality, in material directed at its own supporters.^x A similar distinction was made by the Evangelical Alliance. In its public contribution to the debate, the Alliance centred on predominantly secular arguments, with theological justifications being limited to sparse and passing references to 'the spiritual and biblical reasons for supporting marriage as being between a man and a woman'. The Biblical context was mentioned just once in its consultation submission, and this also came at the very end. This emphasis on secular reasons, however, was not replicated in material designed for its own members, rather than a public audience. In this, the Alliance placed much greater emphasis on theological reasons for its opposition to the proposals. A recent 'Marriage Briefing' described marriage as being 'part of God's plan for the world', claimed that marriage is 'emphasised throughout the Bible', and noted that 'Jesus firmly reminds his followers of the vital and special role marriage plays'. The differences between the sexes, it claimed, are 'part of God's design for humanity'.

This public/private split can also be seen in the approach taken by the Roman Catholic Church. In its public pronouncements on the matter (including its consultation submission and a briefing to MPs ahead of the Parliamentary vote at Westminster) the arguments put forward against same-sex marriage have been entirely devoid of theological reasoning, but focused instead on secular assertions around 'the common good of society'. These claimed, *inter alia*, that marriage 'has an important and unique function', that the proposals have 'no clear mandate' and that any redefinition would have 'far reaching long-term consequences'. A

briefing paper by Catholic Voices, an organisation designed to represent Catholicism in the public sphere, set out the rationale for this particular focus. Stating that it explicitly ‘eschews theological or religious presuppositions in order to argue from natural-law or reason-based propositions’, it claimed that since civil marriages were ‘outside the authority of the Churches, exclusively religious objections to the proposed change are therefore at best irrelevant or inappropriate’. But again, however, the private position has been rather different, and Church leaders have been far more theologically inclined when addressing their own members directly. A letter from the Archbishops of Westminster and Southwark, distributed for reading at all Catholic congregations at Easter 2012, for example, described marriage in highly religious terms, declaring it to be ‘sharing in the mission of Christ’ as well as in ‘the mystery of God’s own life...between Father, Son and Holy Spirit’.

The same dynamic is evident in the actions of the largest oppositional campaign group, Campaign for Marriage (C4M), and its Scottish counterpart, Scotland for Marriage. In their public statements, campaign literature, briefing documentation and petitions, these campaigns have made scarcely any mention of theological justifications, but have centred solely on secular themes and arguments, presenting themselves as a broad-based, non-sectarian movement containing like-minded people of all faiths and none. This impression, though, is a misleading one. The reality is that both groups have close and extensive links to religious bodies and are driven, at core, by theological motives. Among the founder members of C4M include Christian Concern and the Evangelical Alliance, and the organisation has strong connections to a range of other conservative Christian groups, such as CARE, Anglican Mainstream and, not least, the Christian Institute, whose Director, Colin Hart, is at the same time the C4M campaign manager.^{xi}

The secular frame

The close link between theology and religious attitudes towards homosexuality has not been reflected in the public arguments used by religious groups opposed to same-sex marriage. With a few exceptions, theological justifications have either been absent or have been significantly downplayed in favour of secular arguments based on tradition, social utility, democratic values and religious freedom. The particular form taken by religious opposition on this issue can be explained with reference to three inter-related factors: the process of secularisation, a shift to identity politics and the composition of religious groups themselves.

The first of these factors involves the long-term decline of religion in Britain. Official census statistics show that the proportion of the adult population in England and Wales describing themselves as Christian declined from 71.7% in 2001 to 59.3% in 2011, while the proportion describing themselves as having no religion increased from 14.8% to 25.1% over the same period. Other surveys have produced similar results. Figures from British Social Attitudes show that the proportion of British adults describing themselves as belonging to no religion rose from 31% in 1983 to 50% in 2010, while the proportion describing themselves as Christian fell from 66% to 44%. Moreover, just 14% of the adult population reported attending a place of worship at least once a week, just 9% attended at least once a month, and 56% never attended at all. This issue is also demographically charged, and hence likely to become more pronounced over time. More regular attenders tend to be significantly older than non-churchgoers, and attendance for younger age groups show the sharpest rates of decline. Concerns about the public influence of religion are also common. Recent research conducted by YouGov-Cambridge found that 71% of people thought that religious leaders should not be able to influence government decisions, and 81% felt that religious beliefs should remain a private affair. Research by Ipsos-MORI produced congruent results, with

74% of self-identified Christians holding the view that religion should be a private matter with no special influence on public policy.^{xii}

In this context, one possibility for the prevailing use of secular rather than theological arguments against same-sex marriage, is that this denotes a recognition (even if not self-conscious or explicit) that, in a largely secularised culture, reasons based on religious appeals no longer have the social or political purchase they may once have enjoyed, and that in order to be influential arguments need to be framed in such a way as to be consistent with the concerns, themes and language of wider society.^{xiii} Indeed, this point has been made by the ex-Archbishop of Canterbury, Rowan Williams. Observing that overtly religious forms of reasoning are no longer considered to be valid in public discourse, Williams noted that ‘reflections heavily based on the Bible or tradition....will be greeted as platitudinous or irrelevant’^{xiv}

The specific character of oppositional arguments, particularly those displaying a concern for issues of religious freedom, are also linked to the increasing use, by religious groups, of identity-based themes as a means of framing political issues. This has been driven by a number of factors, including the apparent success of identity politics in promoting the interests of minority groups (not least homosexuals), and growing perceptions that religious beliefs are under increasing threat. According to a 2009 poll by ComRes, 58% of Christians felt that living according to their faith in Britain was now more difficult than five years ago. A survey the following year found that 93% of Christians believed that religion, especially Christianity, was being marginalised. An inquiry into Christian experiences in Britain, conducted by the cross-party group, Christians in Parliament, found that ‘religious freedom’ was considered by most organisations giving evidence (73%) to be the most pressing issue at the present time.^{xv} In response to these perceptions religious groups have increasingly turned

to notions of group identity and a language of minority rights, appealing to liberal, secular values in their demands for equal treatment and respect for difference.^{xvi}

This emphasis on identity also helps to account for the distribution of theological arguments in religious opposition to same-sex marriage. Broadly stated, larger and more diverse organisations, such as national-level churches, umbrella groups or networks, are more limited in their ability to publicly utilise theological arguments by a need to manage internal tensions and avoid antagonising their various and disparate streams of opinion, and are hence pushed to downplay doctrinal matters on controversial issues in favour of more nuanced, secular arguments. Observing the point, the Church in Wales noted that a key factor behind its own lack of theological reasoning on the issue of same-sex marriage was that ‘Christian churches, groups and organisations represent a wide variety of opinion on same-sex relationships’. In contrast, smaller and more theologically unified organisations, especially those from minority faiths or those that are less mainstream in their orientation, and for whom maintaining a more ‘purist’ position may form a core part of their identity and organisational *raison d’être*, are likely to have greater scope to deploy theological arguments; and, indeed, may have to frame issues in such a way in order to satisfy their own members.

The emphasis on secular rather than religious arguments illustrates the extent to which secular currents have percolated through British society and culture. But while positioning the issues in this way may well have been a useful strategic manoeuvre for religious groups, helping to galvanise opposition to the proposals in a way that explicitly religious arguments might not have been able to do, religious opponents of same-sex marriage face a number of on-going difficulties. One obvious problem is that theological viewpoints are, by their very nature, strongly resistant to change. As such, religious bodies that continue to oppose same-sex marriage as the issue becomes increasingly normalised are likely to find themselves ever

further at odds with societal opinion on this, and related social issues. Religious groups that fail to adjust run the risk of being considered increasingly anachronistic and irrelevant, thereby adding to the pressures already being brought to bear by wider processes of secularisation.

While a key feature of the religious response to these challenges has been to place greater emphasis on group identity and a language of minority rights, this remains an inherently self-limiting approach. Amongst other things, this position serves to validate the rights claims of others, including interests that may be considered to run counter to one's own, resulting, where such claims come into conflict, in outcomes that are more likely to favour liberal, rather than religious freedoms. The point was recently borne out by a high-profile decision from the European Court of Human Rights, which rejected a number of claims brought by Christians alleging that their employment rights had been breached by religious discrimination.^{xvii} At the same time, assertions that religious bodies need to be accorded the same formal rights and equalities as other social interests also highlight the sectional character of religious groups themselves, as but one social interest among many, thereby making it even-more difficult to sustain specifically religious privileges, such as the kind of exemptions from equalities legislation needed to allow them to avoid marrying same-sex couples.

But much of this is yet to be seen. For now the simple fact is that religious opposition to same-sex marriage has failed in its endeavour. The dilution of theological arguments shows that secular currents run deep, but events show that they remain far from still. As cultural tides continue to turn, religious organisations seeking to maintain a public role will need to find new terms of engagement and new means of bridging the divide between theology and society if they are to avoid becoming ever-more marginal and isolated in their outlook. The odds may not be in their favour, but alternatives, all the same, look thin on the ground.

ⁱ Marriage is a devolved issue, with Scottish arrangements being a matter for Holyrood. The Northern Ireland Assembly currently has no plans on the issue.

ⁱⁱ The Scottish plans also included proposals to lift the restrictions on Civil Partnership ceremonies in religious buildings.

ⁱⁱⁱ See ComRes, 'Civil Partnerships Study', April/May 2012; Angus Reid poll, July 2011; H. Thompson, 'One in five Britons opposes gay marriage', YouGov, 4 October 2012; HMG, 'Equal Marriage: The Government's Response', December 2012; Scottish Government Social Research, 'Registration of Civil Partnerships, Same Sex Marriage: Consultation Analysis', 2012.

^{iv} For example see A. Yip, 'Queering religious texts: an exploration of British non-heterosexual Christians' and Muslims' strategy of constructing sexuality-affirming hermeneutics', *Sociology*, vol.39, no.1, 2005, pp.47-65; D. P. Haider-Markel and M. R. Joslyn, 'Beliefs about the origins of homosexuality and support for gay rights: an empirical test of attribution theory', *Public Opinion Quarterly*, vol.72, no.2, 2008, pp.291-310; A. Adamczyk and C. Pitt, 'Shaping attitudes about homosexuality: the role of religion and cultural context', *Social Science Research*, vol.38, 2009, pp.338-51.

^v See L. R. Olson, W. Cadge and J. T. Harrison, 'Religion and public opinion about same-sex marriage', *Social Science Quarterly*, vol.87, no.2, 2006, pp.340-60; ComRes, CPanel survey, October 2011; Evangelical Alliance and Christian Research, '21st Century Evangelicals: a snapshot of the beliefs and habits of evangelical Christians in the UK', 2011; B. Clements, 'Research Note: The sources of public feelings towards religious groups in Britain: the role of social factors, religious characteristics, and political attitudes', *Journal of Contemporary Religion*, vol.27, no.3, 2012, pp.419-431.

^{vi} The following section is drawn from a variety of public documents, including website resources, media reports and interviews, but is based predominantly on formal submissions to the consultations of the Westminster and Scottish governments.

^{vii} The Office of the Chief Rabbi similarly refers to theological reasons, describing marriage as a 'sacred institution' and stating that Jewish Law prohibits homosexual practice. The response from the Hindu Council (provided by request) also centred on religious justifications, claiming that: 'Our scriptures clearly view marriage as an union of man and woman'.

^{viii} The continued restriction of Civil Partnerships to same-sex couples was also frequently cited as a reason why the proposals would not reduce inequality.

^{ix} J. Rivers, 'Redefining marriage: the case for caution', Jubilee Centre, Cambridge Papers, vol.21, no.3, 2012.

^x For example see A. Miniciello-Williams, 'The attempt to impose same-sex marriage', Christian Concern, 11 May 2012.

^{xi} See for example: A. Tippetts, 'Comment: the Coalition for Marriage – a creeping rhizome of religious extremism', *Pink News*, 5 March 2012.

^{xii} See Office for National Statistics, 'Religion in England and Wales 2011', December 2011; British Social Attitudes, 28th report, 2012; YouGov-Cambridge, poll research, August 2012; Ipsos-MORI, 'Religious and Social Attitudes of UK Christians in 2011', Poll for the Richard Dawkins Foundation for Reason and Science.

^{xiii} See M. S. Miceli, 'Morality politics vs. identity politics: framing processes and competition among Christian right and gay social movement organizations', *Sociological Forum*, vol.20, no.4, 2004, pp.589-612; K. von

Stuckrad, 'Secular religion: a discourse–historical approach to religion in contemporary Western Europe', *Journal of Contemporary Religion*, vol.28, no.1, 2013, pp.1-14.

^{xiv} R. Williams, *Faith in the Public Square*, Bloomsbury, London, 2012.

^{xv} See Premier Christian Media, 'Report on the Marginalisation of Christianity in British Public Life 2007-2011'; ComRes, 'Papal Visit', November 2010; Christians in Parliament, 'Clearing the Ground inquiry, Preliminary Report into the Freedom of Christians in the UK', February 2012.

^{xvi} See, for instance: M. Bernstein 'Identity politics', *Annual Review of Sociology*, vol.31, 2005, pp.47–74; R. Muir and M. Wetherell, 'Identity, Politics and Public Policy', Institute for Public Policy Research. London, 2010.

^{xvii} Just one of the four cases taken to the ECHR was upheld, and in this the key points raised had already been ceded by the employer several years before.