



## Protection of Conscience Project

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# For Students

**Sean Murphy, Administrator**  
**Protection of Conscience Project**

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## Introduction

Conflicts of conscience can arise for a variety of reasons in nursing or medical practice, just as they do in other walks of life. However, if you are preparing for a career in medicine, nursing, pharmacy or related fields, you probably know that the exercise of freedom of conscience in health care is controversial. It often generates adverse and even hostile reactions from persons in positions of power or influence, and from colleagues, patients, or special interest groups. If you think you could become the target of this hostility, read on.

## I. Preliminaries

Those who disagree with your position will most likely do so because they are working from beliefs and principles uncritically assimilated from the dominant social, legal and intellectual culture. Your religious or moral upbringing may place you, in some sense, outside this culture, but your perspective may also reflect unexamined commitments to religious or moral beliefs. Unless these underlying differences are exposed, ethical disputes between you and your colleagues will be difficult to resolve.

Acknowledgement of three further points will be helpful.

First, in an important sense, everyone is a believer. Everyone acts and lives according to some ultimate standard by which he distinguishes right from wrong. In this respect, an atheist is as much a believer as an observant Jew. To require that someone surrender his religious or moral convictions and instead accept 'the ethics of the profession' does not exclude belief; it suppresses one kind of belief and replaces it with another. Absent the demonstrable superiority of the ethics of the profession, there is no reason to submit to such an authoritarian demand.<sup>1,2,3,4,5</sup>

Second, the sciences that deal with material reality are not the only sources of knowledge, and certainly do not produce what is essential for the realization of human happiness through the correct ordering of society and human relationships. Empirical evidence can provide raw material needed for adequate answers to moral or ethical questions, but it cannot answer them. Science is necessary – but not sufficient. Moral decision-making requires more than facts. Love, justice, mercy, solidarity, wisdom and other virtues will make the most unscientific society a happy one, while the most scientific society will be rendered miserable by their absence.<sup>6</sup>

Third: freedom of conscience is the starting point, not conscientious objection. There is no so-called "problem of conscientious objection." That would imply

that freedom is in jeopardy or the country is in danger because too many citizens refuse to do what they believe to be gravely wrong. On the contrary: we teach our children that they should refuse to do what they believe to be wrong in every walk of life. Why should medicine be the exception? Certainly, the exercise of freedom of conscience by medical practitioners affects other people, but so, too, does the exercise of other fundamental freedoms. The Mafia and Hell's Angels exist by virtue of freedom of association, but academics and activists have not responded to contract killings and human trafficking by raising the alarm about "the problem of freedom of association." Freedom of association is not a problem to be solved. Neither is freedom of conscience.

Since everyone is a believer, everyone conscientiously objects to something. For example, those who say you are acting unethically by refusing to provide X for reasons of conscience are conscientiously objecting to your conscientious objection. Conscientious objection is simply one way of exercising freedom of conscience. It is a means by which a practitioner can preserve his own integrity by refusing to facilitate or participate in what he considers to be an immoral act. It is not a means to avoid something merely distasteful or disturbing, nor is it a means to control the conduct of the patient or convert patients or colleagues to one's views.

The following recommendations presume these preliminaries. They are not exhaustive. They should be adapted to your circumstances, experience and personality.

## **II. Identify procedures of concern**

As a first step, you must identify practices, procedures, or services that may be expected of you, but to which you object for reasons of conscience. The most common controversies centre around issues at the beginning and end of life: abortion, contraception, euthanasia, assisted suicide. However, the morality of artificial reproductive technology and eugenic engineering is sharply contested, and you may also have concerns about research on human subjects. Students in some countries may have to consider what might be expected of them in relation to capital punishment, torture, or coercive interrogation of persons in state custody.

## **III. Know the science**

Sound moral or ethical reasoning depends upon a complete and accurate grasp of relevant facts.<sup>7</sup> For example: one cannot discuss the morality of embryonic stem cell research without a correct understanding of human embryology, and conscientious objection to euthanasia ought to be informed by adequate knowledge of palliative care. You may not be able to master all of the literature on a given subject, but you should take care to inform yourself fully about critical issues or points of contention. Demonstrate appropriate academic discipline and intellectual honesty in your adherence to or rejection of research findings.

## **IV. Distinguish between philosophy and science**

Academic discipline requires an ability to distinguish between what lies within the province of science and what lies elsewhere. "Personhood" can have distinctive philosophical or legal meanings, but it is not a scientific concept at all. Whether or not something "ought" to be done is a subject for philosophy, religion, or ethics - not science.<sup>8</sup>

It is quite appropriate to challenge moral reasoning that is based upon erroneous science. But you need not tolerate bullying by professors, preceptors or colleagues who attempt to dismiss your moral convictions on the specious grounds that they are ‘unscientific’; their own moral convictions are equally unscientific, and cannot be otherwise.

## **V. Be able to articulate the basis for your objections**

Having identified morally problematic procedures or services, which you may be able to do with little difficulty, it is not prudent to rest a claim to conscientious objection upon a generic and undeveloped appeal to religious belief or freedom of conscience. You must articulate the basis for your objections. There are three reasons for this.

First: even if the law in your jurisdiction recognizes freedom of conscience and religion, such freedoms are not unlimited in principle. Those who want to suppress freedom of conscience among health care workers are less likely to deny that freedom than to substantially restrict it. Thus, you must not only be able to identify a religious or moral basis for your objection; you must be prepared to argue that it is reasonable and possible to accommodate you.

Second: religious believers may find that nominal co-religionists do not share their judgement about the moral acceptability of a procedure. This can make it more difficult to credibly assert, for example, that “Christians do not do X” or “Muslims do not do Y”, especially if the person opposing your views has some official religious status or authority. Additional complications arise within a denominational health care institution in this situation.

Third: people raised within a religious, moral or cultural tradition are more likely to live by their beliefs and principles than to analyse them. As a result, they may find it difficult to explain or defend them when pressed, even if those principles are solidly grounded in practical wisdom and tested by centuries of collective experience. They may also make contradictory or ill-founded statements when struggling to articulate their views. In consequence, they can lose credibility with colleagues or persons in authority, and significantly weaken arguments that might be made later in an appeal before an academic committee or in a disciplinary hearing or court case.

Carefully consider the religious doctrines or moral principles to which you adhere to ensure that you understand them correctly, can apply them in practical situations and can explain them to others. As a conscientious objector, you must develop your ability to communicate with people who do not share your views or who actively oppose them. Listen carefully to opposing arguments and prepare effective responses.

## **VI. Establish the extent of your objections**

If you wish to avoid compromising your personal integrity, you must reflect carefully upon how to apply your religious or moral convictions in critical situations. You must consider how you will respond when in doubt about significant facts or moral issues, particularly when life or health is imminently at risk.

Some people consider themselves morally culpable only if they are direct participants in an immoral act, and do not object to referring a patient to someone willing to do what the patient wants. Others believe that it is immoral to facilitate a wrong by referral or other forms of assistance. Demands for

compulsory referral or other forms of indirect participation generate much of the controversy about the exercise of freedom of conscience in health care. Conflicts also arise about providing some kinds of information. You must determine, in advance, how you will approach these issues.<sup>9,10</sup>

Religious and ethical traditions frequently offer principles or guidelines to assist with moral reasoning. Be sure that you are aware of them, and be prepared to look to the insights offered by other traditions to supplement your own.

## **VII. Know relevant university policies**

Universities ought to have fairly extensive policies on evaluations of academic progress and of preceptorships. These policies should set out, in general terms, how the evaluations are to be done and how they may be appealed. A description of the appeal process ought to include the manner in which an appeal is to be launched, the stages through which it progresses, and the times within which each stage must be completed. Ideally, the policies will also set out the composition of the various committees or bodies hearing the appeal and the rights of students with respect to representation at the hearings. You should review these policies and ensure that you understand them and know how to access them.

## **VIII. Know relevant policies of the profession**

Professional colleges and associations have codes of ethics and policies that touch on issues of concern to conscientious objectors. For example: the Canadian Medical Association does not require referral for morally controversial procedures. Obtain copies of these policies and study them. Pay particular attention to the policies of regulatory bodies like Colleges of Physicians, which have disciplinary and licensing authority, but do not ignore the policies of specialist associations that may have considerable influence in setting ‘standards of care.’

## **IX. Know human rights law**

You cannot be expected to master human rights jurisprudence, but you should read the statutes governing human rights law in your jurisdiction and make copies of relevant sections. Be aware that statutes are interpreted by courts in decisions that are reported in “case law,” and that a full understanding of the law requires knowledge of these cases. You are unlikely to have time for that kind of research. If a question arises about the application of part of a human rights statute to your case, you might begin by seeking help from a friend who is studying law. You might also be able to consult a paralegal service provided by a university law school, unless you believe that it may be unsympathetic or even hostile. If the issue is important or complicated, consult a lawyer.

## **X. Know freedom of information law**

Many jurisdictions now have freedom of information statutes that give citizens the right to access any information about them held by state or institutional authorities. Depending upon the wording of a statute, such a law might be used to force the university to disclose any information it has in its files concerning you, including ‘confidential’ internal memos and e-mails. If there is a freedom of information law in your jurisdiction, obtain a copy of it and find out whether or not it applies to the university. You may be able to get this information easily if the university has a privacy or freedom

of information officer responsible for complying with requests for disclosure.

## **XI. Be alert**

Having identified your concerns, you must be alert to any suggestion or inference that someone who can adversely affect your professional or educational standing has taken unfavourable notice of your views. The first indication could be as blatant as an expletive-filled insult, or as subtle as a questioning glance. You must be on the lookout for any sign of approaching difficulty in order to take all appropriate steps to protect yourself. On the other hand, being alert does not mean being habitually suspicious or distrustful. Caution is appropriate; anxiety or fear are not.

## **XII. Be respectful**

Some objectors encounter problems primarily because of the way they communicate with patients, colleagues or others. If it is necessary to explain your position, do so in a way that refers to your own moral responsibility, not that of your patient or colleague. Some explanations or terminology may make others uncomfortable, but may be required to fully articulate your position. However, whenever possible, avoid expressions that impute wrongdoing to others or that might come across as "preaching".

## **XIII. Respond appropriately to signals of unease**

Conscientious objection is likely to make colleagues who do not share your views uncomfortable because it implies that what they are doing is wrong. It is unwise to challenge their moral judgement directly because this will increase their discomfort and provoke hostility.

If you perceive discomfort, take note of it: "You seem troubled/ disturbed/surprised." Invite dialogue: "Have I offended you?"

This approach expresses concern for others and respect for their sensibilities, while providing an opportunity for discussion.

You should not become hypersensitive to what others might be thinking; that will only cause needless anxiety. On the other hand, one should not ignore clear signals that something is amiss. Your ability to read those signals will depend upon how well you know the other person and your own experience. If in doubt, remain silent, but make a note of the incident. If a problem is developing, your notes will probably make it apparent to you in time.

## **XIV. Defuse confrontation**

In addition to discomfort, you may encounter a belligerent challenge, contempt or condescension. If you are taken by surprise or find yourself flustered, no harm is done by admitting the fact and suggesting that you and your interlocutor should make time for an uninterrupted chat. If it is possible to make time for it then and there, do so. However, don't rush into what might prove to be a contentious discussion simply because you feel the need to counter an offensive or ill-timed remark. You will do yourself and your colleague a favour by giving yourself even a few minutes to reflect and relax.

## **XV. Begin by listening**

Resist the urge to explain or defend yourself. Instead, ask your interlocutors to explain their concerns. Listen carefully, and ask questions, not to challenge their views, but to clarify the issues and identify any unexamined presuppositions that underlie their thinking. This will give you the opportunity to settle some butterflies, organize your own thoughts and build your confidence. It should also diminish any antagonism felt by fair-minded critics, since they will see that you are listening to them and taking their concerns seriously. They may even feel that they are making a significant impact on you.

Nonetheless, the most important reason to begin by listening is that you cannot respond effectively if you do not know what case you have to answer. You will only exasperate colleagues if you don't understand them or argue from incorrect assumptions about what they know or believe. Let them tell you what they think. Identify points of agreement and points of contention, and work together from there.

The notion of working together with critics is important. The goal is authentic and respectful communication, even if it involves serious argument and fundamental disagreements.

## **XVI. Don't be in a rush**

If you are uncertain about how to reply to facts or an argument presented by your critics, you should simply admit it and promise to continue the discussion after you have had time to think further about it or research the problem. Offer your critics the same courtesy, unasked for, if need be. There is no need to resolve everything at once. In fact, it may prove difficult to resolve even preliminary matters in the first encounter.

## **XVII. Be cautious if 'thinking out loud'**

When serious discussion generates enthusiasm for enquiry you may find yourself 'thinking out loud' as you attempt to tease out the strands of your critics' argument or consider the significance of facts they raise. When the issue is related to your conscientious convictions, this ordinarily harmless practice can have undesirable consequences, especially in conversation with persons in authority. If you sincerely say "A", and, upon reflection, later revise "A" to "B," you may be accused of duplicity or irrationality, or characterized as someone who doesn't know what he believes.

When you have to think out loud in serious conversations with preceptors or colleagues about ethical issues, be sure to tell them that is what you are doing so that they will recognize the provisional nature of your comments. If you realize you need to reflect more carefully before continuing such a conversation, thoughtful people will accept that, and critics will have no just cause for complaint. Better to consider an issue privately or with the assistance of an ally than to speak to it prematurely.

## **XVIII. Make notes of every incident**

Make detailed notes each time you encounter criticism or questions about your views, even if the incident seems minor or unimportant. The real significance of a question in September may not become apparent until after a clash in February. You will never regret recording information, but

you will certainly regret not having done so.

Do not rely on your memory even in the case of encounters that you are sure you will never forget. An appeal to an academic committee may not be heard for months; cross-examination before a court or human rights tribunal could come two years afterward. You *will not* accurately recall what was said unless you make notes of it at the time. Moreover, if the other parties to the incident made notes and you did not, it is probable that their accounts of what took place will be given much greater weight than yours.

If you cannot make detailed notes at the time or immediately afterward, make what notes you can, and expand them at the first reasonable opportunity that day. See *Making Notes: Documenting Workplace Conflicts* for detailed discussion of note taking.<sup>11</sup>

Although note-making is obviously useful if a problem actually occurs, it can also help you to navigate uncertain terrain with greater confidence. You cannot know what will happen in future. Rather than worry about what might happen, make notes and put the matter aside. As time passes, your notes (or lack of them) may well confirm that you have nothing to fear. On the other hand, they may establish a pattern indicative of a developing problem and help you respond effectively. In either case, you will have done something useful by making notes and avoided unnecessary and unproductive stress.

## **XIX. Obtain copies of critical documents**

You should obtain a copy of any document referring to your situation, including media reports, social media comments and internet postings. Relevant social media postings should be copied as soon as they are found, as they may soon be deleted if the originator realizes you may find them useful. Techniques for capturing on-line information include:

- saving web pages as MHT files
- taking screen shots and saving them as image files
- printing web pages/printing/converting web pages to pdf
- downloading and saving files

Incorporate the date and time of the document as the first part of the file name in the form YYYY-MM-DD-HH-MM. This will facilitate automatic chronological filing of documents that may not have been found in chronological order. Add the source URL and date and time it was accessed in the document if that is not done automatically by the access/save process, or otherwise make note of it. This information will be important if it is necessary to cite the documents.

If presented with a formal document for your acknowledgement, such as a memo, caution, reprimand or evaluation, first consider whether you should seek legal or other professional advice before signing or acknowledging it as requested. If you disagree with the document in whole or in part, but decide to sign or acknowledge it, include with your signature or acknowledgement a statement of your disagreement.

In all cases, initial each page. When a significant part of a page is blank, strike a line from the last

line to the bottom of the page and initial there. Strike through and initial blank sections of a document. These precautions will prevent changes being made to the document after you have seen it. If you are later presented with a different document, the differences between the two may be significant.

Request copies of such documents. If university authorities refuse, politely advise them that you believe that you are entitled to it because it is your information. Explain that you would like to avoid legal action to compel its release. If this has no effect, consult university policies, access to information legislation and contacts within your profession. If your university has a law school you may be able to access some form of para-legal assistance through senior students there; otherwise, see a lawyer. If you are persistent and methodical you are likely to find a way to convince or compel the university to comply with your request.

## **XX. Get help - *early***

It is important to connect with like-minded colleagues in the university so that you can discuss problems as they arise. It is even more important to remain in contact with sympathetic people already active in your chosen profession. Their experience and knowledge of its administration will likely be invaluable if you run into trouble. Seek their advice and assistance as soon as you encounter any significant criticism. When approached by a student in difficulty, the Protection of Conscience Project will immediately facilitate contact between the student and professionals who are willing to assist.

If you encounter significant opposition, criticism, unfair evaluations or other forms of repression from university authorities, professors or preceptors, *do not* assume that you will be able to work things through on your own, especially if you have to launch an academic appeal. Seek legal advice. Failure in a key preceptorship or subject may nullify everything else you have accomplished. The harm done by losing an appeal at the first level may prove very difficult to undo in subsequent appeals or even through civil litigation.

## **XXI. Networking: doctors & nurses without borders**

Anti-religious secularists often try to banish religion from the public square by claims that religious beliefs are intrinsically divisive and encourage differences that lead to violence. The example of friendly collaboration in matters of mutual interest among people of different faiths, disciplines and backgrounds provides a practical and powerful counter-witness to such assertions. This is one of the reasons that the Project Advisory Board consists of scholars from different disciplines and different faiths, including Judaism, Catholic and Protestant Christianity and Islam.

Long before a crisis looms you should seek the fellowship of students and professionals from other religious traditions (or none) who have a common interest in securing freedom of conscience in health care. You may be surprised to find that someone from a completely different faith and culture is more supportive of your views than a co-religionist who lives down the street.

If your university has a medical school, it may well have a law school and departments of philosophy and political science. You may find friends and supporters in all of these faculties.



## **XXII. Media: look before you leap**

### **“Going public”**

Beware of suggestions that you should go to the media in the hope of garnering sympathy or support for your position. “Going public” should only be attempted after careful consideration and consultation; it is normally inadvisable. If there is an internal review or appeal process available to you, that is the first place to make your case. You are likely to undermine your credibility if you appear to be seeking a verdict through the media rather than in the proper forum. University officials involved in an appeal process may resent media scrutiny, and that may adversely affect the handling of the appeal.

Further, media reports, especially those that contain misquotes or other inaccuracies, can come back to haunt you during an academic appeal or judicial proceeding. You may find yourself being asked to explain something that you did not say, or (worse) something that you did say that was reported out of context, or (worst of all) something you regret having said that was not only accurately reported, but captured in an audio recording.

Conscientious objectors usually form a minority within a profession and the public at large, so even if the media take up the story and people take notice, it is likely to generate as much opposition as support. Moreover, opponents of freedom of conscience in health care tend to be well-funded and well-connected with media, government and the professions. Media attention may cause them to launch a campaign against you, and you may be hard-pressed to counter it.<sup>12</sup>

Another point to consider is that the media, politicians and many members of the professions tend to be dismissive of anything to which a pro-life label is attached. If your objection concerns a pro-life issue, you will be able to secure the support of the pro-life community, but that may carry very little weight with the wider public or those handling your case, and may actually inflame prejudice against you.

Once you “go public” you will have no control over how the media handle the story or the consequences. That is one of the reasons your opponents may be more inclined to compromise if they are uneasy about the possibility that you *might* launch a media initiative. On the other hand, a failed media initiative will demonstrate that they have nothing to fear from public exposure and is likely to solidify their intransigence.

### **Be prepared**

Someone else — not necessarily friendly — may go to the media about your situation, and you may get an unexpected phone call or email from a reporter. It is best to plan for this eventuality.

In the first place, decide how much you can safely disclose and discuss if approached for comment. There is no harm in confirming the obvious or what the reporter already knows, such as the school and faculty, your position and the fact that you are involved in an internal process dealing with ethical issues. You can gracefully decline to go beyond this (even if pressed for more detail) by explaining that you are avoiding public comment while the internal process is ongoing.

If you believe you can safely provide more than this, prepare one small index card to capture what

you want to say. Keep it clear, short and to the point: something easily used as a soundbite. For example: “The issues include the university’s commitment to pluralism and discrimination against students in relation to ethical medical practice.”

### **If a reporter calls**

If surprised by a call from the media, you need not agree to an immediate impromptu interview. Explain that this is not a good time for you, take the reporter’s name and contact information and offer to call back. Ask if the reporter has a deadline and try to respond by that time. This will give you a chance to confirm that the caller actually is a reporter, settle your butterflies and consider your position.

Do *not* answer a request for an interview or questions with, “No comment.” An unsolicited request for an interview can be courteously turned aside by explaining that you hope to resolve the problem through the channels open to you, and you don’t wish to complicate matters by speaking publicly. A good reporter will accept this, but will also try - politely - to get you to say something more, perhaps in response to a hypothetical question. Don’t take the bait. Limit comments to those in your prepared index card. Take the reporter’s name and contact information and explain that you will call should you decide to speak publicly later on.

### **If interviewed**

So-called “citizen reporters,” bloggers and web commentators are not subject to ethical protocols that are supposed to govern reportage by legacy media. However, for the purposes of this paper (avoiding, managing and mitigating conflicts) the distinction is not stressed. Students in difficulty are especially vulnerable and are not well placed to predict the actual practices of reporters who call. The safest course is to assume that anything you say to a reporter may appear on the front page of a national newspaper or go viral on social media, even if you are told it is “off the record” or “background.”

Reporters frequently electronically record interviews. Modern journalistic protocols require reporters to inform the person they are recording and ask permission. You can ask, “Are you going to record this?” You may also record your conversations and interviews with reporters, but always tell them you are doing so. You can explain that you want to be able to review what you said to make sure it was right.

If you choose not to answer a question, explain why you cannot answer it. For example: you may not want to discuss the particulars of an incident because of a pending review or hearing, or to respect confidentiality.

Do not attempt to suggest what angle reporters should take in a story or what they should write. *Never* ask a journalist to let you review a story before publication. Most will refuse, many will have nothing more to do with you, and not a few will make you the target rather than the subject of a column or editorial.

If, after an interview, you realize that you have made an error or believe that you didn't express yourself clearly, call the reporter to clarify your comments or correct your mistake; better to be considered sincerely mistaken than carelessly ignorant.

If a news article misquotes or misrepresents what was said, advise the editor of the publication or broadcast and ask for clarification or retraction.

### **Other considerations**

Even if a reporter submits a story that accurately describes an interview, an editor may mangle it by cutting or changing it for publication.

Television and radio interviews present particular problems because a lengthy interview may yield a five second sound bite unrepresentative of the discussion. These ‘bites’ can be sandwiched between other visuals or commentary to produce unpleasantly surprising results. It is also extraordinarily difficult to successfully convey a philosophical or moral argument on television because pictures - the very essence of TV journalism - are better at communicating emotion than logical thought or complex ideas.

‘Advocacy journalism’ from any perspective is potentially problematic; ‘friendly fire’ kills, too. Media may highlight controversy (conflict sells) and polarize opinion by simplistic reporting that fails to make appropriate distinctions or identify important issues.

## **XIII. The Protection of Conscience Project**

If you are in serious difficulty, download and complete the Complainant Worksheet from the Project website.<sup>13</sup> It is meant to help you to obtain and organize information pertaining to your case. Completing the Worksheet before you see a lawyer or other professional will provide you with much of the information he may require in order to assess your position.

Use the Project website to obtain arguments and information relevant to your situation. Contact the Project Administrator if you cannot find what you need, or if you are encountering coercion or discrimination. Every effort will be made to provide you with support and assistance. The service is limited, but it is free.

Even if it had the resources, the Project has no standing to intervene with university authorities or appear before a tribunal hearing your case, but it may be possible to prepare a report on the matter. The report will be given to you and not disseminated further without your permission. You can discuss this with the Project Administrator.

### **Notes**

1. Iain T Benson, “There are No Secular ‘Unbelievers’” (2000) 7(Spring) *Centrepoints* 1-3, online: <<http://www.consciencelaws.org/religion/religion010.aspx>>.
2. Iain T Benson, “Why ‘public’ should not mean ‘atheist’”, *The Ottawa Citizen* (16 September, 2010), online: <<https://www.consciencelaws.org/religion/religion001.aspx>>.
3. J Budziszewski, “The Illusion of Moral Neutrality - Part IV”, *First Things* 35 (Aug/Sept 1993), 32-37, online: <<http://www.consciencelaws.org/religion/religion037.aspx>>.
4. Sean Murphy, “Establishment Bioethics” (20 August, 2005), *Protection of Conscience Project* (website), online: <<http://www.consciencelaws.org/ethics/ethics016.aspx>>.

5. Iain T. Benson “Seeing Through the Secular Illusion” (2013) 54 (Supplement 4) *Nederduitse Gereformeerde Teologiese Tydskrif* (Dutch Reformed Theological J) 12-29, online: <<http://ojs.reformedjournals.co.za/index.php/ngtt/article/download/573/965>>.
6. Sean Murphy, “Science, religion, public funding and force feeding in modern medicine: Responding to Bronca, T. ‘A conflict of conscience: What place do physicians’ religious beliefs have in modern medicine.’ *Canadian Health Care Network*, 26 May, 2015” (8 June, 2015), *Protection of Conscience Project* (website), online: <<https://news.consciencelaws.org/?p=6181>>.
7. Diane N Irving, “The Woman and the Physician Facing Abortion: The Role of Correct Science in the Formation of Conscience and the Moral Decision Making Process” (Paper delivered at *The Guadeloupien Appeal: The Dignity and Status of the Human Embryo*, Mexico City, Mexico, 28 October, 1999) ((2000) 67(4) *Linacre Q*, 21– 55), online: <<http://www.consciencelaws.org/ethics/ethics008.aspx>>.
8. Diane N Irving, “Scientific and Philosophical Expertise: An Evaluation of the Arguments on ‘Personhood’” (1993) 60(1) *Linacre Q* 18– 47, online: <<http://www.consciencelaws.org/ethics/ethics000.aspx>>.
9. Sean Murphy, “Referral: A False Compromise” (27 May, 2010), *Protection of Conscience Project* (website), online: <<http://www.consciencelaws.org/ethics/ethics012.aspx>>.
10. Sean Murphy, “The Problem of Complicity: Effective Referral and Physician Participation in Euthanasia, Assisted Suicide, Abortion, Execution and Torture” (15 March, 2016), *Protection of Conscience Project* (website), online: <<http://www.consciencelaws.org/ethics/ethics082.aspx>>.
11. Sean Murphy, “Making Notes: Documenting Workplace Conflicts” (19 November, 2018), *Protection of Conscience Project* (website), online: <<http://www.consciencelaws.org/resources/notes-001.aspx>>.
12. Sean Murphy, “NO MORE CHRISTIAN DOCTORS!” (21 February, 2018 ), *Protection of Conscience Project* (website), online: <<https://www.consciencelaws.org/background/procedures/birth002-contents.aspx>>.
13. *Protection of Conscience Project*, “Complainant Worksheet” (1 May, 2018), *Protection of Conscience Project* (website), online: <<https://www.consciencelaws.org/resources/worksheet.aspx>>.