

Woodfield House  
Tangier  
Taunton  
Somerset TA1 4BL

Direct Line:  
Fax:  
General Enquiries: 0870 3330123 (Voice)  
0870 3330125 (Minicom)  
Email:  
Website: <http://www.charity-commission.gov.uk>

Your Ref:  
Our Ref:

Date: 16 August 2001

**NARCONON - 267386**

I note from the latest accounts on our file (31<sup>st</sup> December 1997) that the funds of Narconon are now split between a Narconon Branch and a Criminon Branch. As we do not appear to have any information on Criminon, I would be grateful if you could let me have full details of its purpose and activities. I would also appreciate copies of any promotional literature produced by the trustees.

When replying, would you please also enclose copies of the accounts from 1997 to date, plus the trustees' annual reports, together with details of Narconon's present activities and future plans. Again, if there is any relevant literature, I would be pleased to receive copies.

I look forward to hearing from you.

Woodfield House  
Tangier  
Taunton  
Somerset TA1 4BL

Direct Line:  
Fax:  
General Enquiries: 0870 3330123 (Voice)  
0870 3330125 (Minicom)  
Email:  
Website: <http://www.charity-commission.gov.uk>

Your Ref:  
Our Ref:

Date: 25 April 2002

**Narconon - 267386**

Following letter to you dated 9 January; this matter has now been referred back to me. As you are aware, I was asking for details of the activities of Narconon and Criminon back in August 2001.

I am grateful for the information which has now been supplied.

I would be interested to receive further details of Narconon's drug free programme and its efficacy. Is this programme supported by medical authorities in England? If so, would you please provide evidence of that support. As you know, charitable status is dependent upon evidence of public benefit. In assessing the question of public benefit with reference to a non main-stream method of treatment, the Commission is concerned not only with scientific "proof" of its effects but also with the question of whether there is a risk of exploitation of the vulnerable or desperate by the promise of results which are not supported by scientific evidence, and also whether there is a risk of physical or psychological harm to the person undergoing the course of treatment or programme which might affect the question of public benefit. Consequently, I hope you will understand why I require this further information.

Regarding Criminon, would you please provide details of, or copies of, the correspondence courses supplied to inmates in prisons. Have the trustees had these courses evaluated by, say, an independent expert? If so please provide details.

I realise that past trustees may have supplied similar information in the past in respect of Narconon. However, many of our old files have been destroyed and therefore we have no background or up to date information on this available to us.

I look forward to hearing from you.

## INTERVIEW MEMORANDUM

**Interview held at Harmsworth House on 8 August 2002 at 11.00**

**Attendees:**

**Charity Commission)**  
)

**Narconon)**  
)

The purpose of this meeting was to provide representatives from Narconon with the opportunity to present evidence as to the effectiveness of the organisation's drug rehabilitation programme (Narconon) and its programme to help rehabilitate prisoners (Criminon) and to give us a clearer idea of the current activities being undertaken by the charity. This case arose after concerns were expressed to the Charity Commission by the Treasury Solicitor's office about serious question marks that have been raised over the courses run by Narconon and an apparent lack of good evidence of any scientific basis for the claims made for the treatment. We also had concerns that we had not received recent accounts from the charity. Accounts were provided prior to the meeting but the accounts raised questions about the charity's current activities.

**Narconon:**

We began by establishing what are the current activities of Narconon. The recently filed accounts showed very little activity in terms of income and expenditure. Much of the information in the past regarding Narconon concerned its drug rehabilitation programme but, from the accounts, it seemed that, whilst this is a significant activity of Narconon's operations in the USA, the Netherlands and elsewhere, it did not seem that this formed a significant activity of the UK operation. confirmed that this is the case. Narconon had run a small drug rehabilitation centre some years ago but this has since closed (in 1997). The drug rehabilitation programme undertaken at the unit was carefully considered by Kent Social Services prior to its registration and it was funded by Social Services and from voluntary donations. The reason for the unit's closure is that Narconon had only been able to obtain a licence to run a small bed unit but it needed to be able to run a 15 bed or more unit in order to make it financially viable.

Narconon's activities now are focused on drug education and prevention of drug abuse, such as their 'Truth about drugs' seminar which is delivered by past addicts. Narconon has a Centre in Bermondsey (rented from Southwark Social Services) which provides a 'shop front' for Narconon and acts as a drop in centre. A separate non-charitable company (Narconon London) has been established to run the Bermondsey Centre. The Centre refer people (many of whom are referred to them by Social Services) for detox treatment where appropriate, although the Centre itself does not run the detox programme. Narconon has been in discussion with Southwark Social Services about the possibility of establishing a rehab centre but there are no firm plans for this at the moment.

explained that most of Narconon's activity centres around the drug education programme which is mainly carried out at schools. asked how the education seminars are financed. There was some confusion about this. indicated at first that Narconon charges fees (to pay for the lecturers' time and travel expenses) but when it was suggested that that income and expenditure did not seem to be reflected in Narconon's accounts indicated that the lecturers often paid their own expenses.

was therefore asked if (following the meeting) she could provide further information about last year's drug education programme and its associated costs.

asked how Narconon measures the success of its drug rehabilitation/education programme. advised that success is measured by undertaking outcome studies at 2 and 5 years after completion of the programme, but pointed out that it can be difficult to keep track of the movements of people who have been through the programme after that length of time. No studies have been undertaken in the UK on the success of the education programme although studies are being undertaken in the USA.

### **Criminon:**

and were asked about the Criminon activities. We were advised that the programme currently supports about 200 inmates in the UK, and the programme is very widely used in countries such as Mexico and South Africa (where judges will often recommend that certain inmates participate in the programme and may reduce the sentences of those that agree to participate in it).

It was explained that the purpose of the Criminon programme is to help inmates improve their self-confidence and learn to take responsibility for their own actions. It consists of a correspondence course which is overseen by course tutors. The programme is entirely funded by voluntary donations (the inmates are not charged for the course). There are no outcome studies of the value of the programme available for the UK although we were provided with examples of feedback from hundreds of inmates who had completed the course.

and were asked if they could provide:

- a list of UK prisons whose inmates had participated in the Criminon programme and where the courses are currently being delivered;
- examples of recent testimonials from inmates who have participated in the courses;
- any information that can be provided regarding the efficacy of the courses;
- examples of the course literature.

We thanked and for attending the meeting. expressed his concern that Narconon were being asked to validate the drug rehabilitation programme and Criminon programme yet again and did not want to have to keep validating this time and again. provided us with a copy of previous correspondence on this which was submitted to the Commission in 1995 which we agreed to consider.

We appreciated concerns about this and agreed to give the matter careful consideration once we received the additional information we required.

Hodkin & Company  
42-44 Copthorne Road  
Felbridge  
East Grinstead  
West Sussex  
RH19 2NS

Woodfield House  
Tangier  
Taunton  
Somerset TA1 4BL

Direct Line:  
Fax:  
General Enquiries: 0870 3330123 (Voice)  
0870 3330125 (Minicom)

Email:

Your Ref:  
Our Ref:

Date: 10 December 2002

### **Narconon - 267386**

Thank you for your letter of 4 September and the additional information you supplied. Please let me know if you would like to have any of this material returned to you. Please also accept my apologies for the delay in responding to you.

At our meeting on 8 August with you and \_\_\_\_\_ and I indicated that our concerns with regard to Narconon related to:

- The low level of income and expenditure and lack of detail shown in Narconon's accounts combined with a lack of evidence to show what activities were being undertaken by Narconon to support its stated purposes;
- The efficacy of Narconon's drug treatment programme if this was being undertaken in the UK (we assumed not given the low level of activity indicated by the accounts); and
- The effectiveness of the Criminon programme.

Narconon's stated objects are broadly:

- (a) to reform and rehabilitate persons who are for the time being or who have at any time been drug addicts;
- (b) to reform and rehabilitate persons who have at any time been convicted (whether in the United Kingdom or elsewhere) of any crime;
- (c) To promote research;
- (d) To acquire premises;
- (e) To establish/fund other charities with the same objects.

It is perhaps worth noting at this point that objects (c) – (d) are powers rather than objects. If the trustees intend making any changes to the trust deed in the future they may wish to take the opportunity to also describe those clauses as powers in furtherance of the objects.

### **Drug rehabilitation programme**

I would like to deal firstly with Narconon's drug rehabilitation programme. I was grateful to you for providing me with a copy of Narconon's letter to the Charity Commission of 12 September 1995. Would it also be possible for you to provide me with a copy of our response to that letter? Unfortunately our records for that period have been destroyed.

I understand that Narconon is not currently running its drug rehabilitation programme in the UK, and has not done so since 1997. The only related activity that Narconon currently undertakes in the UK appears to be the programme of drug education lectures in schools. It is unclear when, if ever, Narconon will be in a position to carry out its drug rehabilitation work here.

Narconon's current object (a) is "to reform and rehabilitate persons who are for the time being or who have at any time been drug addicts" but Narconon's activities (ie the drug education programme) is more concerned with the prevention of drug abuse than reforming or rehabilitating drug addicts. Since the drug education programme could not really be said to further an object to reform and rehabilitate drug addicts I think it would be more appropriate to amend object (a) to something along the following lines:

"(a) To advance the education of the public and/or persons who are or have been dependent upon or affected by the use of drugs about all matters relating to drug abuse/addiction in particular by the provision of advice, information and support."

This object would more accurately reflect the activities undertaken by Narconon.

### **Criminon programme**

I am grateful to you for providing the material on the Criminon correspondence course for prisoners. The information you have provided was helpful but it did not include anything from the Prison Authority or Probation Service to indicate their views on the usefulness of the Criminon programme in reforming and rehabilitating prisoners. I will therefore be writing separately to those authorities to seek their views. If you have anything from either of these central bodies (as opposed to say a prison warder or governor) regarding the effectiveness of the Criminon programme it would be helpful if you could send me a copy.

I appreciate that assessing the success rates of activities such as the Criminon programme can be difficult since no one programme or factor can ever claim to be the thing that prevented a person from reoffending. All the sorts of things that can be done to help prisoners and ex-offenders (eg education and training, giving financial and other support, rehousing and finding employment, counselling etc) are directed towards providing an environment in which the person is less likely to reoffend, but none can ever provide a guarantee that those people will not reoffend. In some cases, it may be the experience of being in prison and the efforts of a supportive and vigilant family that contribute more than anything to a person's success at staying away from criminal activity. Nevertheless, it would be useful to obtain some sort of an assessment from people working in the prison and probation services on the usefulness of the Criminon programme in this context. Subject to whatever further information can be provided on this, it may in any case be more accurate to

describe Narconon's object (b) as "To assist in the reformation and rehabilitation of persons who have at any time been convicted (whether in the United Kingdom or elsewhere) of any crime."

I apologise again for the delaying in replying to you but look forward to your response.

Hodkin & Company  
42-44 Copthorne Road  
Felbridge  
East Grinstead  
West Sussex  
RH19 2NS

Woodfield House  
Tangier  
Taunton  
Somerset TA1 4BL

Direct Line  
Fax:  
General Enquiries: 0870 3330123 (Voice)  
0870 3330125 (Minicom)

Email:

Your Ref:  
Our Ref:

Date: 18 March 2003

### **Narconon - 267386**

Thank you for your letters of 31 December 2002 and 2 January 2003. Please accept my apologies for the delay in replying.

As you know, our current interest in the activities of Narconon (both its drug rehabilitation programme and its Criminon programme) arose from concerns about Narconon's most recent accounts (which we had had some difficulty in obtaining). The accounts showed a surprisingly low level of income and expenditure (given Narconon's stated purposes) and little detail to indicate what activities are currently being undertaken by Narconon in furtherance of its stated purposes. This in turn raised questions about whether Narconon is undertaking its drug rehabilitation programme in the UK (and related concerns about the efficacy of that programme) and the effectiveness of the Criminon programme.

and I met with you and  
to discuss these concerns and we have had a further exchange of correspondence to clarify these points further. I am grateful to you for your assistance and patience in this matter.

### **Drug education and drug rehabilitation programmes**

In my letter of 10 December 2002 I suggested that an additional object along the lines of "*to advance the education of the public and/or persons who are or have been dependent upon or affected by the use of drugs about all matters relating to drug abuse/addiction in particular by the provision of advice, information and support*" would appear to more accurately describe Narconon's drug related activities.

Although I appreciate that Narconon would like to continue its drug rehabilitation programme in the UK in the future, it is not an activity that Narconon is currently undertaking. I take your point that the drug education programme may involve drug addicts as well as potential drug addicts but, from the information you have provided, it appears that it is geared mainly at preventing drug abuse than helping to rehabilitate drug addicts. At the moment it is difficult to conclude that much of the current drug education programme (particularly the work that is done in schools) is geared towards reforming and rehabilitating drug addicts.

I note that you have undertaken to ask Narconon's trustees to consider the adoption of an additional object as suggested above and I await with interest the outcome of this consideration. I would emphasise though, that this is not just a question of making the objects read slightly better. Without a change of objects along the lines that I have suggested, it is difficult to point to any significant activity that is being undertaken by Narconon to

further its first stated object "to reform and rehabilitate persons who are for the time being or who have at any time been drug addicts".

With regard to Narconon's drug rehabilitation programme, I accept that when we reviewed Narconon's activities in 1995 we concluded that there was no evidence to suggest that the programmes and techniques used by Narconon in drug rehabilitation were not effective. Since then, concerns about Narconon's methods of drug rehabilitation have been publicly expressed. For example, in expert advice on Narconon given to the Swedish National Board of Health and Welfare on 26 November 1996, Professor Folke Sjoqvist considered the detoxification programme and considered that the claims made for it are not medically established. I am also aware that other concerns have been expressed that the claims made by Narconon for its drug rehabilitation programme are not sustainable. This information was not available at the time of our review in 1995. Nevertheless, Narconon is not currently undertaking its drug rehabilitation programme in the UK and those opinions alone would not be sufficient to conclude that Narconon's purposes and activities are not charitable. They may, however, be relevant in the consideration of any future application to register a new Narconon charity with the specific purpose of undertaking its drug rehabilitation programme. This is not to say that such an application would necessarily fail because of these opinions, since we would of course consider also any evidence which might demonstrate the effectiveness of the programme, but we would need to take it into account when determining the benefit to the public of those activities.

### **Criminon**

Thank you for the information you provided about the Criminon programme, in particular the information about studies that have been carried out overseas. It is unfortunate that no similar studies have been undertaken in the UK. I still have some reservations about agreeing that it has been conclusively shown that the Criminon programme leads to the reformation and rehabilitation of criminals (for the reasons I set out in my letter of 10 December 2002). However, I accept that (although no study into the efficacy of the programme has been undertaken in the UK) the UK Prison Service does allow prisoners to participate in it and we have not received any complaints about the programme or are aware of any publicly expressed concerns about the programme. So, whilst proof of the efficacy of the programme remains to be established, there is not, in my view, sufficient evidence for me to conclude that the programme does not operate for the public benefit to justify removal of its charitable status. I would, however, prefer to see a restatement of the object relating to this activity as suggested in my letter of 10 December as I think this more accurately reflects what has been shown about the effect of the Criminon programme. I think that the wording of the object will be of particular importance if Narconon are seeking to register Criminon as a separate charity as that application will have to be considered afresh and benefit to the public of the stated purpose and related activities will have to be clearly shown.

I would be grateful if you could let me know what the trustees decide with regard to the proposed change of objects. Also, since our concerns about Narconon were originally triggered by its accounts, I would urge the trustees to ensure that in future the accounts make much clearer towards which activities the charity's resources have been directed and to also ask for a more prompt submission of the accounts.

Hodkin & Company  
42-44 Copthorne Road  
Felbridge  
East Grinstead  
West Sussex  
RH19 2NS

Woodfield House  
Tangier  
Taunton  
Somerset TA1 4BL

Direct Line:  
Fax:  
General Enquiries: 0870 3330123 (Voice)  
0870 3330125 (Minicom)

Email:

Your Ref:  
Our Ref:

Date: 03 April 2003

**Narconon - 267386**

Thank you for your letter of 21 March 2003 enclosing a draft Deed of Variation.

In my letter of 10 December 2002 I noted that objects (c), (d) and (e) in clause 5 of the Trust Deed dated 8<sup>th</sup> April 1974 are powers rather than objects and that, if any changes are required to the deed, the trustees might take the opportunity to describe those clauses as such.

Might I therefore suggest that:

1. You retain clause 5(a) as currently drafted;
2. You substitute clause 5(b) with the wording as suggested in clause 1.1 of the draft deed of variation;
3. You include the wording as suggested in clause 1.2 of the draft deed of variation as a new clause 5(c)
4. You insert [after the new clause 5(c)] the words "In addition to any other powers they have, the trustees may exercise any of the following powers in order to further the objects (but not for any other purpose):". Then insert the existing clauses 5(c), (d), and (e) as powers (i), (ii) and (iii).

Hodkin & Company  
42-44 Copthorne Road  
Felbridge  
East Grinstead  
West Sussex  
RH19 2NS

Woodfield House  
Tangier  
Taunton  
Somerset TA1 4BL

Direct Line:  
Fax:  
General Enquiries: 0870 3330123 (Voice)  
0870 3330125 (Minicom)

Email:

Your Ref:  
Our Ref:

Date: 17 April 2003

**Narconon**

Thank you for your letter of 8 April, enclosing an amended draft Deed of Variation.

I can confirm that the amended Deed of Variation is acceptable. Please let me have a copy of the executed Deed of Variation in due course.

You ask what information is likely to be required in connection with the application to register Narconon London as a charity. I would suggest that you provide whatever information you think best illustrates how Narconon London will achieve its stated purpose. I do not think it should be necessary for you to resubmit a 'banker's box of material' in support of the application but it would be helpful if you could provide whatever aspects of that information that you think best demonstrates the efficacy of the work that will be undertaken by Narconon London. The more recent information you can provide the better.

Hodkin & Company  
42-44 Copthorne Road  
Felbridge  
East Grinstead  
West Sussex  
RH19 2NS

Woodfield House  
Tangier  
Taunton  
Somerset TA1 4BL

Direct Line:  
Fax:  
General Enquiries: 0870 3330123 (Voice)  
0870 3330125 (Minicom)

Email:

Your Ref:

Our Ref:

Date: 02 July 2003

**Narconon**

Thank you for your letter of 2 June enclosing a copy of the executed deed of variation.

We have amended our records accordingly. I will ensure that the relevant paperwork is marked for retention.

I am glad that we have now been able to bring this matter to a resolution. I am grateful to you for your assistance and forbearance in dealing with this matter.