

Dame Julia Unwin
Chair
Charity Commission



Letter to the Charity Commission

By email only

15th July 2026



Dear Dame Julia Unwin,

On 8th July Amnesty International UK, together with Amnesty International UK Section Charitable Trust, published a report entitled ***A growing threat: the anti-rights movement in the UK***. This presented 117 organisations and grassroots groups as an “organised anti-rights movement targeting the rights of women and LGBT+ people”. After widespread criticism Amnesty has withdrawn the report for review, but it has not apologised. A sister report, [*Like a snowball: the growth and impact of the gender critical movement in the UK*](#) (May 2026), made similar accusations. That remains live (with a list of organisations included in the technical annex).

The impugned organisations include several charities, as well as other groups defending the rights of women, girls, children and gay, lesbian and bisexual people; charities and organisations concerned more broadly with human rights; Christian charities and organisations; organisations of parents and clinicians concerned about paediatric transition; grassroots women’s-rights organisations doing vital work domestically and internationally with vulnerable women and children; and a rape crisis centre and support service for female survivors of male violence.

The characteristic that unites them all is that they are associated with the “gender critical” belief that there are two sexes, that human beings cannot change sex and that sex matters.

Smearing groups as “anti-rights” because of their philosophical or religious beliefs, as Amnesty does, paints a target on those groups. Calling for the Charity Commission, funders and the media to subject them to less favourable treatment because of their beliefs – as the most recent report does – is an explicit call for these groups to be subjected to unlawful discrimination.

Discrimination and disadvantage experienced by women and girls is persistent, endemic, and deeply entrenched. It ought to be shocking that one of the country’s most respected human-rights charities is openly campaigning for systematic unlawful discrimination against groups that stand up for women’s rights. But the prejudice displayed in Amnesty’s report is ubiquitous in the charity sector.

The *Like a snowball* report openly laments that the application of the Equality Act has “contributed to the normalisation of all manifestations of gender critical belief”. The Amnesty employees who wrote it and signed it off, and those who have been giving interviews, making conference presentations and producing social-media content with the same discriminatory message, may not have thought they were doing anything wrong because this form of unlawful discrimination is the norm in large parts of the sector. Anyone who speaks out about this discrimination is risking their career or position on a charity board.

As you have set out in your speeches and to Parliament, charities may hold different and sometimes competing views, and the role of the Commission is to ensure that they are well governed, operate within their remit, pursue their agenda appropriately and do so in a civil way.

But charities that have adopted a discriminatory approach to individuals with gender-critical beliefs, stereotyping those individuals as harmful or hateful, are acting unlawfully, as shown in the cases of *Forstater v Centre for Global Development* and *Adams v Edinburgh Rape Crisis Centre*. Charities that refuse

to comply with the law are not well-governed. And a sector that systematically misunderstands the law is a problem for its regulator.

While other sectors are getting on with complying with the Equality Act following the *For Women Scotland* judgment, senior leaders and trustees across the charity sector have been acting as if the law does not apply to them.

Amnesty International UK, which explicitly described itself as a registered charity in its application to intervene in the *For Women Scotland* case, tested its proposed interpretation of the law with the highest court in the land. It was found by the Supreme Court not to be inclusive, but rather to be incompatible with a “workable” and “coherent” legal system for protecting women, gay, lesbian and bisexual people and transgender people from discrimination.

The court agreed with *For Women Scotland*, Sex Matters, LGB Alliance and the other lesbian interveners that the terms “man” and “woman” in the Equality Act 2010 refer to sex, not self-declared gender identity or paperwork, and that services provided only for women or only for men must be provided on the basis of sex. Transgender people remain protected from discrimination and harassment in work, education, service provision, premises and associations, on the basis of both sex and gender reassignment. The new EHRC guidance provides detailed explanations of how mixed-sex and single-sex services can be provided lawfully in a way that treats everyone with respect.

In human-rights terms, although rights are universal, the rights to freedom of expression and to privacy, to freedom of association and to manifest beliefs are qualified and may be constrained by lawful mechanisms in a democratic society.

Debates over how to reconcile women’s rights and transgender people’s rights are debates of this kind.

Does Article 8 of the European Convention on Human Rights, which protects private life, mean that men who wish they were women have the right to undress in women's changing rooms? Or does it mean that women and girls have the right to change in female-only spaces?

Is describing someone as a man when he wishes to be referred to as a woman a breach of dignity and of rights? Or is it simply stating ordinary facts that must be recognised in order to protect the dignity, privacy and autonomy of women and girls?

The Equality Act 2010 represents the settled, democratically agreed balance of rights in Britain. It recognises that men who identify as "trans women" remain men for the purpose of the law concerning sex discrimination, and therefore for the provision of lawful separate sex services, including by charities.

Amnesty's longstanding argument that "trans women are women" and that there should be no debate about this is in opposition to the law and other people's human rights.

The trustees of Amnesty International UK Section Charitable Trust are far from alone in allowing intolerance, prejudice, ideological fervour, fear of being blacklisted in the sector and conflicts of loyalty between their duty to their charity and the principle of trans allyship or trans-identifying friends and family to take hold in the charities they govern. There have been several instances of charities and their leaders publicly smearing those with gender-critical beliefs and advocating that they be excluded from the sector and from society:

- On 21st April 2021, around the time when LGB Alliance was awarded charitable status, the then [chief executive of NCVO](#) said: "This step will be painful and dangerous for transgender people harmed by the views and actions of the Alliance." NCVO later rejected applications

from both LGB Alliance and Sex Matters for membership, and admitted us only when we issued a discrimination claim against it.

- In June 2021 [leaders of LGBTQ+ charities](#), including **Stonewall, Mermaids, LGBT Foundation, LGBT Consortium** and **Gendered Intelligence**, published an open letter expressing frustration and disappointment at the Equality and Human Rights Commission's intervention in the *Forstater* case to say that "gender critical" beliefs are a protected philosophical belief.
- On 3rd July 2023 the "[I Stand with Trans](#)" pledge, which referred to gender-critical beliefs as "anti-trans hate" and called on charity leaders to "stand united together against this hate", was signed by chief executives of several major charities and many smaller ones. The signatories included the chief executives of **NCVO, Co-op Foundation, Teenage Cancer Trust, LGBT Foundation, Young Trustees Movement, the Children's Society, Alzheimer's Society, Samaritans** and **Charity Finance Group** as well as several major charity recruiters.
- On 3rd December 2025 [15 mental-health charities](#), including the **Children and Young People's Mental Health Coalition, Mental Health Foundation, Mental Health Matters, Mental Health UK, MHFA England** and **Mind**, wrote to the Minister for Women and Equalities arguing against the protection of single-sex services on the basis of sex, and instead for the inclusion of people on the basis of gender identity. They called for the government to halt the EHRC guidance.
- In January 2026 a group called **Third Sector Against Transphobia** published an open letter describing those who want to see single-sex charities pursue their objects "transphobic groups and individuals".

It is now 15 months since the Supreme Court clarified that sex in law means what it always did, and that this interpretation is essential for protecting women's rights and gay and lesbian rights. But the boards and senior leadership teams of many charities are still professing to be confused. Others are frightened of being blacklisted in the sector if they acknowledge that the law is clear and stand up for fairness and dignity for women and girls. The

result is that across a range of services and activities, charities whose purpose is to benefit women, are using resources to benefit men who identify as women (see [Murray Blackburn Mackenzie's report](#)).

Penny Wilson, writing on behalf of **Third Sector Against Transphobia**, recently [wrote to the Charity Commission](#) claiming that charities do not know how to comply with the law, and calling for more time and for charity-specific guidance.

There is no need for more detailed guidance. The charity sector is not above the law. If a service or facility is provided only for women, only for men or for both sexes, this has the same meaning whether that service is being provided by the public, private or voluntary sectors. Employees, service users and other individuals all have the same human rights. The charity sector needs to understand that the individuals and groups it has derided as “transphobes” and tried to exclude from public life are simply expressing a view that is in line with the Equality Act.

This is not a case of “both sides” needing to disagree well, but of systematic discrimination and harassment by some of the country’s most powerful and respected charities. It is happening openly and under the nose of the regulator.

We call on you to show leadership and reset expectations across the sector by making a statement. The Charity Commission needs to clarify that every charity must follow the Equality Act and ensure that its trustees have an accurate, lawful understanding of its purposes as set out in its governing document. This includes where that refers to women and girls or men and boys, to sex or sexual orientation, and to equality and human rights.

The commission should stand up against the culture of intolerance and discrimination towards people who express ordinary, lawful beliefs that has taken hold across the sector, and which has been demonstrated in the Amnesty reports.

It is unacceptable for a charity to call people or other organisations transphobes, bigots or anti-rights for using clear sex-based language, asking that the Equality Act be respected, raising concerns about safeguarding or medical evidence, being Christians or adhering to religious sexual ethics, just as it would be to commit unlawful discrimination and harassment on the basis of any other protected characteristic.

It does no favours to individuals who identify as transgender or to children exploring their identity to encourage them to think that the law does not apply to them or that they can disregard other people's rights.

Yours sincerely,

LGB Alliance

FiLiA

Sex Matters

For Women Scotland

CAN SG

Genspect

Thoughtful Therapists

Children of Transitioners

Get the L Out UK

Gender Critical Greens

Labour Women's Declaration

Legal Feminist

Lesbian Strength

Merched Cymru

OBJECT – Women Not Sex Objects!

Older Feminist Network

Protect and Teach

Trans Widows' Voices

Virago Women's Workshop

LGB Alliance Cymru

Conservatives for Women

Fair Play For Women
Gay Men's Network
Let Women Speak (formerly Standing for Women)
The Lesbian Project
Transgender Trend
Women's Declaration International (WDI)
Murray Blackburn Mackenzie
Women's Rights Network (WRN)
LGB Christians
Liberal Voice for Women
ScotPAG Scottish Professionals Advising on Gender
SEEN in HR
SEEN in STEM
SEEN in Journalism
SEEN in Sport
SEEN in Health
TU SEEN
SEEN in Publishing
Third Sector SEEN