



4 June 2026

Rt Hon Sir Keir Starmer KCB KC MP  
Prime Minister

Rt Hon Bridget Phillipson MP  
Minister for Women and Equalities

Dear Keir and Bridget,

### **Reject the EHRC's Code of Practice**

I am writing as Interim Women and Equalities lead of the Parliamentary Green Party to raise serious concerns over proposed guidance from the Equality and Human Rights Commission, which is not fit for purpose and will harm trans people living in the UK.

The Code of Practice for services, public functions, and associations is the culmination of years of well-funded campaigns to drive a minority group out of British public life. It sets out a system of segregation where trans people are excluded from services and spaces that reflect their gender, and in some cases also excluded from services and spaces that reflect their sex assigned at birth. Where unisex facilities exist, trans people will be forced into them. Where they do not exist, trans people will be left with nowhere to go.

Your own Equalities Impact Assessment<sup>1</sup> on the code admits there will be a significant impact on those with the protected characteristic of gender reassignment - from forcing trans people to out themselves by using disabled toilets to putting trans women at greater risk of sexual violence by making them use men's services.

The Code of Practice is both cruel and confusing. Inconsistencies between the Code of Practice and its Equalities Impact Assessment, the Gender Recognition Act and the European Convention on Human Rights will leave organisations and service providers at risk of litigation from all sides. Frontline staff in spaces like cafes, gyms, and offices will be forced to police gender, whilst the costs of creating self-contained gender neutral facilities are estimated by your advisors as reaching £600m, which the government is providing no funding to cover.<sup>2</sup> I am pleased to see associations, like the Women's Institute and Girlguiding, given a potential route to serving trans and cisgender women, but this does not counteract the pain caused by the majority of the guidance.

By enacting this guidance, trans people will simply be scapegoated. Research by Translucent found there was just one complaint to English Unitary Authorities in 2025 concerning trans women's use of single-sex spaces, such as toilets and changing rooms.<sup>3</sup> By refusing to act, your government is once again playing politics with trans people's lives, rather than tackling real problems, like the soaring cost of living, rising inequality and the ongoing climate crisis.

Trans people of all ages and backgrounds exist in communities across the country - and always have. They have every right to thrive just as their cisgender friends, family members,

and colleagues do. When Labour brought in the Gender Recognition Act in 2004 it promised trans people they could live their lives with peace, privacy, and dignity. Now you are breaking that promise.

I believe there is a real risk of trans people being essentially segregated from public spaces. I urge you to withdraw the code and take legislative action to create an equalities framework that protects trans people's safety, dignity and humanity.

Yours sincerely,

Siân Berry MP (Interim Women and Equalities lead and proxy for Carla Denyer MP)

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<sup>1</sup> Equality impact assessment. EHRC, May 2026.

<https://www.gov.uk/government/publications/equality-act-2010-draft-code-of-practice-for-services-public-functions-and-associations-2026/equality-impact-assessment>

<sup>2</sup> Final stage impact assessment, 9. Minimising administrative and compliance costs for preferred option. EHRC, May 2026. <https://www.gov.uk/government/publications/equality-act-2010-draft-code-of-practice-for-services-public-functions-and-associations-2026/final-stage-impact-assessment#minimising-administrative-and-compliance-costs-for-preferred-option>

<sup>3</sup> Trans Women and Single-Sex Spaces: 2026 UK Council FOI Report. Translucent. June 2026. <https://translucent.org.uk/trans-women-and-single-sex-spaces-2026-uk-council-foi-report/>