

TRANS INCLUSION POLICY

A policy setting out how the Police Pagan Association will continue to support trans inclusion within the current legal framework.

POLICE PAGAN
ASSOCIATION

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*“There is magic in being seen by people
who understand - it gives you
permission to keep going”*

Alok Vaid-Menon

Section 1

Introduction

The Police Pagan Association is committed to being an inclusive, respectful, and safe space for all Pagan and Heathen police officers, staff, volunteers, and allies, including trans and non-binary people. This Trans Inclusion Policy sets out our values, legal understanding, and practical commitments at a time of significant uncertainty for many trans individuals and for organisations seeking to act lawfully, ethically, and compassionately.

On 16 April 2025, the UK Supreme Court issued a judgment clarifying that, for the purposes of the Equality Act 2010, the legal definition of “woman” is based on biological sex. This ruling has caused understandable concern and anxiety among trans communities and has left many organisations unsure how to interpret their responsibilities. It is important to acknowledge the real impact of this uncertainty on trans people, including fear of exclusion, discrimination, and loss of safety.

The judgment specifically addresses the position of people who hold a Gender Recognition Certificate (GRC), a legal mechanism by which an individual can change their sex for certain legal purposes. It is estimated that around 9,000 trans people in the UK currently hold a GRC.¹ The judgment does not remove legal protections for trans people, but it does raise complex questions about how sex-based rights and protections interact with the protected characteristic of gender reassignment.

Under the Equality Act 2010, trans people, *whether or not they hold a GRC*, continue to be protected from discrimination, harassment, and victimisation on the basis of gender reassignment. These protections remain firmly in law. In addition, public bodies and those exercising public functions must continue to act in accordance with the Human Rights Act 1998, including the rights to dignity, respect for private life, and freedom from degrading treatment.

Following the Supreme Court judgment, the Equality and Human Rights Commission (EHRC) proposed changes to its Code of Practice for Services, Public Functions and Associations. This Code is intended to provide statutory guidance to organisations on how to comply with the Equality Act in practice. Any such guidance must clearly explain how legal protections apply and

¹ Stonewall, “The EHRC’s Statutory Guidance and the UK Supreme Court ruling” www.stonewall.org.uk
Accessed 19/01/2026

provide workable, lawful examples that support inclusion and safeguarding for all protected groups.

The consultation on the proposed changes was conducted over a six-week period, a timeframe that raised significant concern across the voluntary, public, and equality sectors. Additional concerns were expressed about the consultation process itself, including the decision not to publish the full draft Code, instead releasing selected sections. This limited the ability of individuals and organisations to fully assess the implications of the proposed guidance.

The draft Code has now been submitted to the Secretary of State and, subject to review, may be laid before Parliament. Parliamentarians will have a limited period in which to scrutinise the draft guidance. There is no automatic requirement for a full parliamentary debate, making informed scrutiny especially important.

In this context, the Police Pagan Association believes that clarity, proportionality, safeguarding, and inclusion must remain central. We are concerned that, without significant revision, statutory guidance could be interpreted or implemented in ways that lead to unnecessary exclusion of trans people or create confusion for organisations seeking to act lawfully and compassionately.

This policy therefore sets out how the Police Pagan Association will continue to support trans inclusion within the current legal framework. It reflects our commitment to equality, dignity, and safety for all, and our determination to act in a way that is consistent with UK law, policing values, and the principles of mutual respect that underpin our communities.

Section 2

Summary

The Police Pagan Association (PPA) is a national police staff network supporting Pagan and Heathen police officers, staff, volunteers, and allies across the UK.

The Association:

- Provides peer support and advice
- Supports workforce wellbeing and inclusion
- Engages with safeguarding, ethics, and faith literacy
- Works collaboratively with policing bodies, government stakeholders, and civil society

The PPA operates within policing governance frameworks and aligns its work with national standards on equality, dignity, and legitimacy.

Context

On 16 April 2025, the UK Supreme Court clarified the interpretation of “sex” for certain provisions of the Equality Act 2010. While this judgment has generated significant public and organisational concern, it is important to note that:

- Protections for trans people under the protected characteristic of gender reassignment remain in place
- The judgment does not mandate exclusion of trans people from associations, services, or staff networks
- Proportionate, case-by-case decision-making remains a legal requirement

Organisational Impact

Police staff support networks and faith-based associations have faced heightened uncertainty regarding:

- Lawful inclusion
- Safeguarding responsibilities
- Balancing intersecting protected characteristics
- Reputational and workforce wellbeing risks

Clear, lawful guidance is therefore essential.

Legal Position

- The Equality Act 2010 continues to protect trans people from discrimination, harassment, and victimisation.
- Protection applies regardless of possession of a Gender Recognition Certificate.
- The Human Rights Act 1998 requires public bodies and those exercising public functions to act compatibly with rights to dignity, privacy, and non-discrimination.
- Statutory guidance, including Codes of Practice, must be interpreted in line with primary legislation and human rights principles.

In short, inclusion remains lawful, while discrimination does not.

Our Approach

The PPA has adopted a comprehensive Trans Inclusion Policy grounded in UK law, safeguarding best practice, and policing values.

Key Features of the Policy

- Lawful inclusion, not ideology-driven practice
- No blanket exclusions, recognising the legal requirement for proportionality
- Trauma-informed safeguarding, including emotional and psychological safety
- Clear behavioural standards to prevent harassment and hostility
- Governance alignment with national policing principles

The policy is designed to support leaders, organisers, and members to act with confidence and consistency.

Safeguarding and Risk Management

From a policing and governance perspective, the PPA considers that:

- Ambiguity and silence increase risk
- Clear policy reduces legal, reputational, and safeguarding harm
- Inclusion supports workforce wellbeing and trust
- Staff networks require defensible frameworks to manage complex issues

The PPA's approach reflects standard risk management principles used across policing, including early intervention, proportionality, and documentation of decision-making.

Relevance to Policing and Public Confidence

Police legitimacy depends on fairness, ethical leadership, and consistency. Staff networks play a recognised role in:

- Supporting wellbeing and retention
- Providing insight into diverse communities
- Reducing isolation and vulnerability

Exclusionary practice risks undermining trust both internally and externally. Inclusive, lawful practice strengthens confidence and cohesion.

Engagement with Guidance and Scrutiny

The PPA recognises the role of the Equality and Human Rights Commission in issuing statutory guidance. However, we emphasise that:

- Guidance must be workable and legally robust
- It must support inclusion and safeguarding in practice
- It should not be implemented in a way that causes unnecessary harm

The PPA supports thorough parliamentary scrutiny of any statutory Code of Practice affecting equality and association rights.

Statement of Intent

The Police Pagan Association believes that lawful trans inclusion is compatible with safeguarding, policing values, and public confidence.

Clear policy, grounded in law and ethics, enables organisations to protect people, manage risk, and maintain trust during a period of heightened sensitivity and complexity.

We remain committed to constructive engagement, evidence-based practice, and collaboration with Parliament, policing bodies, and equality stakeholders.

Section 3

Our Principles

The Police Pagan Association affirms the inherent dignity, worth, and humanity of trans and non-binary people. We recognise that trans members, colleagues, and community participants may be experiencing heightened fear and uncertainty in the current legal and social climate. This policy exists to provide clarity, reassurance, and a firm commitment to inclusion within the law.

Our approach is grounded in the following principles:

1. Lawful inclusion

We commit to upholding UK law, including the Equality Act 2010 and Human Rights Act 1998, while interpreting and applying these duties in a way that is proportionate, compassionate, and inclusive. Legal compliance is not a minimum standard; it is a foundation on which respectful practice is built.

2. Protection from discrimination and harassment

We recognise gender reassignment as a protected characteristic under the Equality Act 2010. Trans people, whether or not they hold a Gender Recognition Certificate, are entitled to protection from discrimination, harassment, and victimisation. This protection applies across our activities, communications, leadership, and community spaces.

3. Safety, dignity, and respect for all

We are committed to creating environments where everyone feels safe to participate without fear of hostility, exclusion, or scrutiny of their identity. We reject behaviour that undermines dignity, including misgendering, intrusive questioning, or the misuse of legal debates to marginalise individuals.

4. Trauma-informed and safeguarding-led practice

We recognise that many trans people have experienced discrimination, exclusion, or harm. Our safeguarding approach prioritises emotional and psychological safety alongside physical safety, and recognises power dynamics within police, faith, and community spaces.

5. Balance and proportionality

Where different protected characteristics intersect, we commit to addressing issues thoughtfully, proportionately, and on a case-by-case basis. We do not

adopt blanket exclusions. Decisions will be evidence-based, transparent, and rooted in inclusion wherever lawful to do so.

6. Ongoing learning and accountability

We recognise that the legal and social landscape is evolving. This policy will be reviewed regularly, informed by legal developments, sector guidance, and lived experience. We remain open to dialogue, learning, and improvement.

Section 4

Our Policy

This section provides practical expectations to support consistent, inclusive practice across Police Pagan Association activities.

1. Purpose of This Policy

This policy sets out how the Police Pagan Association will support, include, and safeguard trans and non-binary people within the communities it represents and serves.

It exists to:

- Provide clarity in a complex and evolving legal landscape
- Ensure lawful, proportionate, and ethical practice
- Promote dignity, safety, and inclusion
- Support members, leaders, and organisers to act with confidence
- Align with policing values, governance expectations, and diversity staff support network standards

This policy applies to:

- Members and allies
- Staff network leaders and volunteers
- Events, rituals, meetings, and online spaces
- Communications and partnerships

2. Values and Principles

The Police Pagan Association is guided by the following principles:

2.1 Dignity and Respect

- Every person is entitled to be treated with dignity and respect.
- Identity, belief, and lived experience must not be subject to ridicule, suspicion, or hostility.

2.2 Lawful Inclusion

- Inclusion and legal compliance are not opposites.
- We commit to meeting our legal duties while promoting inclusion wherever lawful.

2.3 Safeguarding and Harm Prevention

- Safeguarding includes emotional and psychological safety, not only physical harm.
- We prioritise early intervention, clear boundaries, and trauma-informed practice.

2.4 Proportionality and Evidence

- Decisions must be proportionate to risk.
- We do not act on fear, assumption, or ideology.

2.5 Legitimacy and Trust

- Staff networks play a critical role in trust, wellbeing, and organisational legitimacy.
- Inclusion strengthens confidence in policing, internally and externally.

3. Legal Framework

This policy is grounded in UK law and statutory duties, including but not limited to:

3.1 Equality Act 2010

- Gender reassignment is a protected characteristic.
- Protection applies whether or not a person has:
 - A Gender Recognition Certificate (GRC)
 - Undertaken medical treatment
- Discrimination, harassment, and victimisation are unlawful.

3.2 Human Rights Act 1998

Relevant rights include:

- Article 8, respect for private and family life
- Article 14, freedom from discrimination
- Articles 3 and 8, protection of dignity, autonomy, and identity

3.3 Gender Recognition Act 2004

- Provides a legal mechanism for some trans people to change sex for specific legal purposes.
- The majority of trans people do not hold a GRC.

- There is no lawful requirement for organisations or staff networks to request disclosure of a GRC.

3.4 Policing Duties and Standards

- Duties to fairness, integrity, and ethical behaviour
- Workforce wellbeing responsibilities
- Public confidence and legitimacy obligations

3.5 Statutory Guidance

- Guidance issued by bodies such as the Equality and Human Rights Commission informs practice but does not override primary legislation.
- Guidance must be applied lawfully, proportionately, and contextually.

4. Scope of Inclusion

4.1 Who This Policy Supports

- Trans women
- Trans men
- Non-binary people
- Gender diverse people
- Those questioning their gender identity
- Allies and supporters

4.2 No Requirement for Disclosure

- No individual is required to disclose:
- Gender history
- Medical status
- Legal documentation

Intrusive questioning is not acceptable

5. Behavioural Standards

5.1 Expected Conduct

Association members must:

- Use stated names and pronouns
- Speak respectfully about gender diversity
- Challenge misinformation calmly and accurately

- Act in line with our established safeguarding principles

5.2 Unacceptable Conduct

The following will not be tolerated:

- Misgendering (deliberate or persistent)
- Hostile “debates” about identity
- Intrusive questions about bodies or legal status
- Use of legal discourse to justify exclusion
- Dog-whistling, mockery, or intimidation

6. Participation in Association Activities

6.1 Events, Rituals, and Gatherings

- Trans people are welcome to participate in all PPA events, rituals and gatherings in line with their lived gender.
- Organisers must plan inclusively from the outset.
- Gender-essentialist language should be avoided where possible.
- Symbolism and roles should be framed inclusively.

6.2 Sex-Specific Considerations

- There is no default requirement to restrict participation.
- Any restriction must be:
 - Lawful
 - Evidence-based
 - Proportionate
 - Linked to a clear safeguarding rationale
- Blanket exclusions are not acceptable.

7. Safeguarding Framework

7.1 Safeguarding Principles

- Prevention over reaction
- Least restrictive response
- Trauma-informed practice
- Confidentiality and fairness

7.2 Reporting Concerns

Concerns may include:

- Discrimination or harassment
- Exclusionary behaviour
- Safeguarding risks
- Abuse of power

Reports will be:

- Taken seriously
- Handled sensitively
- Managed through our established safeguarding or complaints routes

8. Online and Digital Spaces

8.1 Standards Apply Equally Online

- Association forums, social media, and messaging platforms are covered by this policy
- Association appointed moderators are empowered to intervene early

8.2 Moderation Expectations

- Remove harmful content
- De-escalate conflict
- Protect targeted individuals
- Escalate serious concerns

9. Intersectionality and Complexity

We recognise that:

- People may hold multiple protected characteristics
- Experiences of discrimination can intersect
- Simplistic framing of “competing rights” is unhelpful

Decisions must:

- Be case-by-case
- Avoid binary thinking
- Prioritise safeguarding and dignity for all

10. Governance and Accountability

10.1 Leadership Responsibilities

Leaders must:

- Model inclusive behaviour
- Apply policy consistently
- Seek guidance when unsure
- Document decisions appropriately

10.2 Alignment with Policing Governance

This policy aligns with principles promoted by the National Police Chiefs' Council, including:

- Legitimacy
- Proportionality
- Ethical decision-making
- Workforce wellbeing

11. Training and Awareness

The Police Pagan Association commits to:

- Ongoing learning and development
- Sharing accurate legal and safeguarding information
- Supporting leaders to manage complex conversations
- Engaging with specialist organisations where appropriate

12. Review and Continuous Improvement

- This policy will be reviewed regularly.
- Updates will reflect:
 - Legal developments
 - Statutory guidance
 - Lived experience
 - Best practice in policing and safeguarding

13. Closing Statement

The Police Pagan Association affirms that trans inclusion is compatible with the law, consistent with policing values, and essential to community wellbeing.

This policy reflects our commitment to:

- Fairness
- Safety
- Dignity
- Trust
- Ethical leadership

We believe that inclusive practice strengthens, rather than weakens, the communities we represent and the service we support.

Section 5

Appendix

Legal Framework and Citations

This appendix provides a non-exhaustive summary of the primary UK legislation, statutory duties, and guidance that inform the Police Pagan Association Trans Inclusion Policy. It is intended to support lawful decision-making and organisational assurance.

A1. Equality Act 2010

Relevant provisions

- Section 7 – Gender reassignment as a protected characteristic
- Section 13 – Direct discrimination
- Section 19 – Indirect discrimination
- Section 26 – Harassment
- Section 27 – Victimisation

Key points

- Protection applies to trans people whether or not they have undergone medical treatment or hold a Gender Recognition Certificate.
- Organisations must not treat someone less favourably because they are trans.
- Policies and practices must not create unjustified disadvantage.

Implications for the Police Pagan Association

- Trans members and participants must not be excluded, harassed, or marginalised.
- Any differential treatment must be objectively justified, proportionate, and evidence based.
- Blanket exclusions are highly unlikely to meet the legal threshold.

A2. Gender Recognition Act 2004

Relevant provisions

- Section 4 – Gender Recognition Certificates
- Section 22 – Confidentiality of Information

Key points

- Enables some trans people to obtain a Gender Recognition Certificate (GRC).
- A GRC changes a person's legal sex for certain legal purposes.
- There is no requirement for individuals to disclose whether they hold a GRC.

Implications

- Organisations should not request proof of legal status unless there is a clear and lawful reason.
- Intrusive questioning risks breaching dignity and privacy.

A3. Human Rights Act 1998

Relevant Articles

- Article 8 – Right to respect for private and family life
- Article 14 – Prohibition of discrimination

Key points

- Decisions affecting identity, dignity, and participation engage human rights.
- Public bodies and those exercising public functions must act compatibly with Convention rights.

Implications

- Trans inclusion is strongly supported by human rights principles.
- Proportionality and necessity are central to lawful decision-making.

A4. Supreme Court Judgment (April 2025)

Relevant findings

- Finding 1 – The definition of “sex”, “man”, and “woman”
- Finding 5 – The exclusion of Trans individuals from single-sex spaces
- Finding 6 – The continuing legal protections for trans individuals

Summary

- Clarified interpretation of “sex” for certain provisions of the Equality Act.

- Did not remove protections for trans people under gender reassignment.
- Did not mandate exclusion of trans people from services or associations.

Implications

- Organisations must continue to balance rights carefully.
- The ruling does not justify fear-based or pre-emptive exclusion.

A5. Equality and Human Rights Commission (EHRC)

The Equality and Human Rights Commission issues statutory guidance and Codes of Practice.

- EHRC guidance does not override primary legislation.
- Guidance must be interpreted in line with:
 - Equality Act duties
 - Human rights obligations
 - Proportionality principles

A6. Policing Governance Context

The Police Pagan Association operates within the wider policing environment and aligns its approach with principles promoted by the National Police Chiefs' Council, including:

- Legitimacy
- Fairness
- Ethical leadership
- Workforce wellbeing
- Consistency in staff network governance

Section 6

Document Control

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