

Annex A to
 Criticism of the NFWI Equality, Diversity and Inclusion (EDI) Policy and Glossary
 Dated 30 May 2023

Specific Criticism of the NFWI Equality, Diversity and Inclusion Policy 2023

| | Point and Paragraph | Criticism and/or Suggested Revision |
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| | NFWI Equality, Diversity and Inclusion Policy 2023 Point 1 | |
| 1 | First paragraph: Democratic ideals | <p>Criticism: I feel this contradicts the policy.</p> <p>The policy is a de facto change to the constitutions as it allows men to join, members were not consulted on this.</p> <p>I inquired when WI rules/constitutions were changed to allow trans-identified men to join the WI, and were the wider membership consulted. The answer was that members were not consulted, nor was there a requirement to do so as members are only consulted on constitutional changes, not policies.</p> <p>I subsequently pointed out that there is a clash between the policy and constitutions and at the time of writing this has not been addressed. The request for a moratorium on new trans members was denied, the requests for a debate and vote ignored.</p> <p>I feel this means the WI does not live up to the democratic ideals it espouses.</p> |
| 2 | First paragraph: Inclusive, supportive and progressive. | <p>Criticism: this policy could be exclusionary to certain groups of women.</p> <p>This policy regards trans-identified men as women and on 19 April 2023 Melissa Green stated in the Guardian “trans women are women^[1]”. There is no critical evaluation of how this may affect women who do not agree with this, including, but not limited to:</p> |

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| | | <p>Women with strong religious beliefs may not wish to share a space with an unknown or unrelated trans identified man.</p> <p>Survivors of male violence, which the WI campaigns on, may prefer a female only space in order to be at ease.</p> <p>Trans widows may not wish to share space with a trans identified man, not all women whose partners become trans identifying are happy with this^[2].</p> <p>Female to male de-transitioners may also struggle to join a group that promotes an ideology that they have now moved away from^[3].</p> <p>A woman with trans identifying parent/s^[4].</p> <p>These women may self-exclude due to this policy.</p> |
| 3 | First paragraph: For all women who live as women. | <p>Criticism: I find this contradicts the policy as the phrase is meaningless (Inclusive Language section) there is no explanation of how to live as a woman. Without an explanation of how to live as a woman the default is harmful stereotypes for both men and women.</p> <p>Language needs to be clear in order for it to be inclusive.</p> <p>I also find it is disrespectful to women who do not follow stereotypical career paths or lifestyles. As a former Army Officer, who served alongside both the Parachute Regiment and the Queen's Royal Lancers (at the time both exclusively male regiments and at times the lone female officer) I find the phrase particularly unpalatable.</p> <p>See point 36, and Annex B point 5.</p> |
| 4 | First paragraph: including transgender women | <p>Criticism: I find this threatens the WI constitution and WI's charitable objects as there is no definition of 'woman' and the policy allows people without a Gender Recognition Certificate (GRC) to join (these people are legally male).</p> <p>This, coupled with the transphobia definition in the glossary, which includes denying someone's</p> |

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| | | gender identity, means Constitutions have been de facto changed without a membership vote. |
| 5 | Second paragraph: Commitment to inclusion | See point 2. |
| NFWI Equality, Diversity and Inclusion Policy 2023 Point 2 | | |
| 6 | First paragraph: Stipulates the organisational and legal position. | <p>Criticism: I refer to my previous letter and find this disingenuous as the policy misrepresents the Equality Act 2010.</p> <p>Sex is a protected characteristic under the Equality Act 2010 and the NFWI can lawfully exclude trans women without a GRC^[5 and 6].</p> |
| 7 | First paragraph: Contravention of this policy would affect the ability of WIs and federations to operate as part of the WI. | <p>Criticism: this could damage the WI's reputation for free thinking and robust debate.</p> <p>Furthermore it could damage the WI's reputation for being an organisation that can hold others to account via its campaigns, we can not challenge: trans identified men in female sports categories; self ID in women's refuges; and the placing of male offenders in women's prisons, this is not an exhaustive list. I do not believe the WI is only a "membership organisation" as stated in the response to my letter dated 7th February 2023. It is a powerful campaigning organisation, but this aspect appears to have been ignored in the rush to accept trans-identified men as members.</p> <p>See point 21 in Annex B.</p> |
| NFWI Equality, Diversity and Inclusion Policy 2023 Point 3 | | |
| 8 | Fifth bullet point: the WI is a space for all women with no barriers to membership. | See point 2. |

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| | NFWI Equality, Diversity and Inclusion Policy 2023 Point 4 | |
| 9 | First paragraph: all women who live as women | See points 2 and 3. |
| 10 | First paragraph: transgender women | See point 4. |
| 11 | First paragraph: ensuring all members are treated fairly whatever their background or individual circumstances. | See point 2. |
| 12 | First bullet point 1: Truth | <p>Criticism: contradicts the policy as the policy includes what I believe to be unsubstantiated claims.</p> <p>I firmly believe the policy supports a fiction that people can change sex, or have an inner gender identity that can be born in the wrong body. There is no conclusive science to substantiate either claim. It is important that the Women's Institute is an evidence based organisation so campaigns are taken seriously and believed.</p> |
| 13 | Third bullet point: welcoming all women. | See point 2. |
| 14 | Third paragraph: We also have a duty of care to all WI members, who have the right to feel safe and protected. | See point 2. |
| 15 | Third paragraph: ensuring all individual needs are met and accommodated for. | See point 2. |

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| | NFWI Equality, Diversity and Inclusion Policy 2023 Point 5 | |
| 16 | First paragraph: The WI has been campaigning for over 100 years... Equal Pay for Equal Work. | <p>Criticism: this policy could threaten campaigning due to a lack of sex-disaggregated data.</p> <p>This policy means WI data is now not disaggregated by sex, therefore threatening previous campaigns such as the one in the policy, and undermining future ones.</p> <p>Previous campaigns that centre women are now under threat due to this policy. Use of the Equal Pay for Equal Work is a great example of this, data needs to be sex-disaggregated in order to ascertain that women are/were paid less than their male counterparts.</p> <p>The UN states “When data is not disaggregated by sex, it is more difficult to identify any real and potential inequalities. Sex-disaggregated data is necessary for effective gender analysis”^[7].</p> |
| | NFWI Equality, Diversity and Inclusion Policy 2023 Point 6 | |
| 17 | Eighth bullet point: Sex | <p>Criticism: I find this disingenuous as this no longer mentions the single sex exemptions allowed for in the Equality Act 2010^[5 and 6]. This is a change from the 2021 policy, which did state this in section 6.</p> <p>The WI can legally restrict membership to women and trans-identified men with a GRC. This has been pointed out to the NFWI and it now appears from the response given to my previous letter, and revisions to this policy, the NFWI is disregarding legitimate concerns.</p> |
| | NFWI Equality, Diversity and Inclusion Policy 2023 Point 11 | |
| 18 | First paragraph: inclusive, supportive and progressive. | See point 2. |
| 19 | First paragraph: all women who live as women. | See point 3. |

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| 20 | First paragraph: assigned at birth | <p>Criticism: unsubstantiated, contradicts the policy as it is unclear therefore not inclusive language.</p> <p>This is not common, clear language, therefore is not inclusive, as required by the policy in the Inclusive Language section. No one would ask a new mother “what sex was your baby assigned?”</p> <p>That sex is assigned at birth is an unsubstantiated claim, I believe it relies on the belief that everyone holds an inner gender.</p> <p>Sex is not assigned at birth, it is observed and recorded/registered. Sex is determined at the point of conception, this is why ultrasounds are able to observe the sex of a foetus before birth.</p> <p>This phrase is repeated nine times in the policy.</p> |
| 21 | First paragraph: live as women | See point 3. |
| 22 | First paragraph: celebrating what it means to be a woman. | <p>Criticism: disrespectful to women by reducing them to stereotypes.</p> <p>The policy and its glossary does not state what is a woman or what it means to be one. At worst it uses vague stereotypes, ‘feminine clothing and hair’^[8]. Without a definition of a woman it is impossible to celebrate what it is to be one.</p> <p>I find it incredibly disrespectful to women to reduce their experiences to feminine hair and clothing. At no point during my Army career was I less of a woman due to my outward appearance or the activity I was undertaking.</p> <p>See point 7.</p> |
| 23 | First paragraph: including transgender women furthers our objectives and enriches our membership. | <p>Criticism: I believe this is unsubstantiated. I have explained how the inclusion of trans identified men could harm the WI and lead to women self-excluding. There is no explanation of how their inclusion furthers our objectives and enriches our membership.</p> <p>See points 2 and 16.</p> |

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| 24 | Second paragraph: the difference between sex and gender. | <p>Criticism: disingenuous as gender is not a protected characteristic under the Equality Act 2010. Women are disadvantaged due to their sex and gendered expectations are the means that this is perpetuated.</p> <p>See point 25.</p> |
| 25 | Third and fourth paragraphs: whole paragraphs. | <p>Criticism: I find this to be disingenuous as there is no legal recognition of gender identity, this could also damage the reputation of the WI as I believe that there has been no critical evaluation of these paragraphs.</p> <p>The United Nations has a different definition and explanation on gender. It states that gender is learned through socialisation, it is not an innate part of a person, and is the means that sex discrimination is perpetuated. Gender identity seeks to make an learned attribute innate. The UN Office of the Special Adviser to the Secretary-General on Gender Issues and Advancement of Women defines gender as referring “to the social attributes and opportunities associated with being male and female and the relationships between women and men and girls and boys, as well as the relations between women and those between men. These attributes, opportunities and relationships are socially constructed and are learned through socialization processes. They are context/ time-specific and changeable. Gender determines what is expected, allowed and valued in a woman or a man in a given context. In most societies there are differences and inequalities between women and men in responsibilities assigned, activities undertaken, access to and control over resources, as well as decision-making opportunities. Gender is part of the broader socio-cultural context^[9]”</p> <p>Moreover, the WI partners with ACWW, women in developing countries are discriminated against due to their sex. Patriarchal social structures often leave them with lack of advancement and perpetuate female disadvantage^[10].</p> <p>Suggested revision: use of the UN definition.</p> |
| 26 | Fifth paragraph: Being a transgender woman ... no legal requirement to have had gender reassignment surgery or other medical intervention. | <p>Criticism: I believe this is disingenuous as it leads the reader to believe there is a legal requirement to allow trans-identified men to join the WI.</p> <p>Gender reassignment is a protected characteristic, however, the Equality Act 2010 specifically</p> |

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| | | allows for single sex provision ^[5] . Moreover those within the protected characteristics can restrict their membership to others with the same characteristic ^[6] . This is different from holders of a GRC who have legally changed sex. |
| 27 | Sixth paragraph: whole paragraph. | <p>Criticism: as per my previous letter this is in direct conflict with the constitution.</p> <p>A GRC creates a legal fiction which changes a person's birth sex, without one, people retain their birth sex. Whilst it is not permissible to ask trans people for a GRC, by not asking, and by having a wide description for a trans-identified man, the NFWI has allowed men to join.</p> <p>This is in direct conflict with constitutions which state: "membership of the WI is open to women who have reached the age of majority"^[11]. This policy allows people who are legally male to join individual Women's Institutes, and according to the policy, if they are challenged it "would affect the ability of WIs and federations to operate as part of the NFWI".</p> <p>The policy could state: it is not permissible to ask a person for their GRC, however, the WI only allows trans-identified men who are holders of a GRC membership. We will not ask you for this, but appreciate that you will respect this.</p> |
| | NFWI Equality, Diversity and Inclusion Policy 2023 Point 12 | |
| 28 | Entire section | Criticism: I believe this inclusion of non-binary gender identities is disingenuous as there is no legal recognition of non-binary identities and gender identity is not a protected characteristic under the Equality Act 2010. |
| 29 | First paragraph: Binary categories of female and male. | <p>Criticism: Sex is binary, this is a scientific fact, therefore it is disingenuous to make statements that lead the reader to think otherwise. Under the Equality Act 2010 the protected characteristic is 'sex'.</p> <p>There are no definitions of male or female in the glossary, without definitions the default is stereotypes. See points 3 and 25, and annex B point 12.</p> |
| 30 | First paragraph: Gender is often expressed in terms of masculinity and femininity, is largely culturally | See point 25. |

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| | determined, and is assumed from the sex assigned at birth. <i>Direct quote from Stonewall</i> | |
| 31 | Second paragraph: Non-binary people may feel both male and female, something in between or not either. They may have a gender identity that changes over time. | Criticism: I find this to be disingenuous as there is no legal recognition of non-binary identities. It also contradicts the Inclusive Language section as this is unclear language, therefore not inclusive. |
| 32 | Third paragraph: fall within our women only exemption. | <p>Criticism: By failing to define what a woman is, by having a wide description for a trans-identified man the NFWI has de facto forced individual Women's Institutes to accept men. As per my previous letter therefore this statement is disingenuous.</p> <p>As policy does not define a woman, it allows anyone who identifies as a one to join. This is different from the Equality Act 2010 which does restrict membership groups to people who share the same protected characteristic^[5 and 6]. A trans-identified man without a GRC does not share the same protected characteristic as a woman, therefore it is lawful to exclude them.</p> <p>I previously noted, in point 17, the policy now does not state it uses the single sex exemptions contained in the Equality Act 2010.</p> |
| 33 | Third paragraph: The WI does not ask members to prove their sex. | See point 27. |
| | NFWI Equality, Diversity and Inclusion Policy 2023 Point 13 | |
| 34 | First paragraph: these women | <p>Criticism: I find this disrespectful to new mothers who are termed as "these women", it contradicts the policy as language must be clear.</p> <p>This policy does not use the term mother. The one thing that unites "these women" is that they are all mothers. I find it disrespectful not to use the word mother, which has nurturing connotations as well as being common parlance. It is also important to use clear language when talking about motherhood^[12].</p> |

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| | | <p>Suggested revision: expectant and new mothers.</p> <p>See point 36.</p> |
| | NFWI Equality, Diversity and Inclusion Policy 2023 Point 15 | |
| 35 | Paragraph 7: Religion and religious belief | <p>Criticism: I believe this contradicts the policy.</p> <p>The inclusion of trans-identified men could constitute indirect discrimination to women of faith who may not want to share a space with an unknown or even unrelated male, even if the person in question considers themselves to be female. There is a direct conflict here between some religious beliefs and gender ideology. See point 2.</p> <p>It is appreciated that some speakers may be male, but this can be communicated in advance to members who may wish to be in a female only space. There is also a difference between a male speaker who will use male facilities rather than a biological male using female facilities.</p> <p>I suggest the NFWI consult members of the Inter Faith Network to ensure women of faith do not self exclude due to this policy.</p> |
| | NFWI Equality, Diversity and Inclusion Policy 2023 Point 17 | |
| 36 | Entire point | <p>Criticism: contradicts the policy, as the policy has forced the WI to try and avoid using sexed language in order to avoid being 'transphobic'. The glossary contains deeply offensive language.</p> <p>Sex language is readily understandable by the majority of the public.</p> <p>I believe this policy erodes the meaning of "woman" and has erased it from campaigns rooted in biological reality. The 2021 resolution states "every two hours in the UK someone dies of ovarian cancer" and fails to recognise that only women have ovaries, and could develop ovarian cancer even after their ovaries have been removed.</p> <p>This language is not inclusive and has been shown to disadvantage women whose first</p> |

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| | | <p>language is not English, are of low literacy and/or have learning difficulties. Sexed language is important especially regarding health^[12].</p> <p>The glossary does not include a definition of a lesbian, and the policy does not use the word mother in the pregnancy and maternity section. See point 34.</p> <p>The glossary does include offensive terms such as “queer” (even recognised by Stonewall as a slur^[14]), “cis gender”, and uncommon terms such as “assigned at birth”.</p> <p>The 2021 Census has revealed the local authorities with the highest numbers of trans identified individuals are Brent and Newham. It is thought that the high numbers are due to proficiency in English and a lack of understanding of the question, opposed to them being transgender^[15]. I believe language needs to be simple and understood by everyone. By using gender neutral words it assumes a certain level of knowledge and understanding, and has been shown to be detrimental. Whilst I accept that language is constantly evolving there needs to be certainty in it too.</p> |
| | NFWI Equality, Diversity and Inclusion Policy 2023 Point 20 | |
| 37 | Unconscious bias: whole section. | <p>Criticism: this could damage the WI's reputation for free thinking and robust debate.</p> <p>See point 7.</p> <p>In the context of gender ideology this can be used to silence women who have doubts about the intentions of a trans woman who wants to join the WI.</p> <p>Any disquiet can be dismissed as unconscious bias rather than a genuine concern. See point 22 in Annex B.</p> |
| 38 | First paragraph: gender identity. | <p>Criticism: I find this disingenuous as gender identities are not a protected characteristic, I believe inclusion of such seeks to replace the protected characteristic of gender reassignment with something more nebulous.</p> |

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| | NFWI Equality, Diversity and Inclusion Policy 2023 Point 22 | |
| 39 | Entire section | <p>Criticism: disingenuous, the NFWI is not allowing members to talk about this policy and its ramifications, and is dismissing members' approaches.</p> <p>I asked that all members be consulted and were able to vote on the inclusion of trans members without a GRC, this request was not even addressed in the rejection letter. The Chair of the NFWI stopped debate on this subject at the Million Women March Pre-Meet, she acknowledged this in her response. Melissa Green stated the debate is "toxic" in my letter dated 7th February 2023 I wrote that I had deliberately sought out compassionate voices in the debate, rather than those shouting the loudest.</p> |
| | NFWI Equality, Diversity and Inclusion Policy 2023 Point 23 | |
| 40 | Entire section | As point 38. |
| | NFWI Equality, Diversity and Inclusion Policy 2023 Point 24 | |
| 41 | Second bulleted list: Resources and organisations | <p>Criticism: I find this exclusionary as no women's rights organisations were consulted, nor were any religious organisations on how this policy may affect their female adherents.</p> <p>There are 3 trans lobby organisations named (37.5%). The WI did not consult women's rights groups such as Sex Matters, A Woman's Place UK and Fair Play for Women. This policy does not give a fair and balanced view of the intersection of women's and trans people's rights.</p> <p>I requested that women's rights groups, such as those listed in the covering letter, be consulted regarding a moratorium, debate and vote and this has been ignored.</p> <p>Suggested revision: talk to women's rights groups and faith groups about the intersection between trans-identified men's and women's and religious rights.</p> |

References

1. [Women's Institute will 'continue to celebrate' transgender women amid inclusivity row](#)
2. [Trans Widows Voices](#)
3. [Detransition - Transgender Trend](#)
4. [Children of Transitioners](#)
5. [Equality Act 2010 - Explanatory Notes](#)
6. [Equality Act 2010 - Explanatory Notes](#) (search 329)
7. [Gender equality: GLOSSARY OF TERMS AND CONCEPTS](#)
8. [Equality, Diversity and Inclusion | National Federation of Women's Institutes](#) - Gender Expression.
9. [OSAGI Gender Mainstreaming - Concepts and definitions](#)
10. [Projects](#)
11. [CONSTITUTION AND RULES for WOMEN'S INSTITUTES](#)
12. [Effective Communication About Pregnancy, Birth, Lactation, Breastfeeding and Newborn Care: The Importance of Sexed Language](#)
13. [Open Letter to NHS chiefs: The importance of the word "woman" in communication about women's health](#)
14. [List of LGBTQ+ terms](#)
15. [Why does the census say there are more trans people in Newham than Brighton? | The Spectator](#)