

Claim No:

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
ADMINISTRATIVE COURT**

BETWEEN:

**THE KING on the application of
THE CHRISTIAN INSTITUTE**

Claimant

- and -

**(1) MINISTER FOR THE CIVIL SERVICE
(2) MINISTER FOR THE CABINET OFFICE**

Defendants

STATEMENT OF FACTS AND GROUNDS

References in the form [initials/para] refer to paragraphs in the witness statements accompanying this claim, namely those of Simon Calvert ("**SC**") and Professor Kathleen Stock ("**KS**").

A. INTRODUCTION AND SUMMARY

1. The Claimant, The Christian Institute, seeks to challenge the participation of civil servants in the Middlesbrough Pride Event which took place on 27 September 2025, wearing t-shirts and carrying flags identifying themselves as members of the Civil Service. The civil servants were authorised and/or permitted to participate in this way (and not prevented from doing so) by the Minister for the Cabinet Office (the Second Defendant), who has overall administrative responsibility for the management of the Civil Service on behalf of the Minister for the Civil Service (the First Defendant).

2. The Claimant is one of the largest Christian organisations in the UK representing evangelical Christians and the churches that they attend. It exists as a charity to promote the Christian faith, including through research, publications and public meetings, and it has regular engagement with the Civil Service concerning legislative and policy matters that impact Christians in the UK. It is concerned about the approach of the Civil Service towards persons (including many of its supporters) who espouse and lawfully express 'gender-critical' views.
3. Civil servants owe a duty of impartiality under the Civil Service Code, which implements the impartiality requirement set out at section 7(4)(b) of the Constitutional Reform and Governance Act 2010 ("**CRAGA**"). This requires them *inter alia* not to act in a way that unjustifiably favours or discriminates against particular individuals or interests. The impartiality obligations in the Code are of central importance to the role of civil servants in providing advice and guidance to governmental decision-makers; at the most basic level it ensures that individuals and interests affected by Government decisions are treated, and are seen to be treated, impartially.
4. The Claimant contends that the active participation of civil servants in the Middlesbrough Pride event, wearing t-shirts and carrying flags identifying themselves as members of the Civil Service, breached the duty of impartiality. These activities amounted to associating with a cause, viewpoint or set of interests on a matter of social or political controversy, namely gender ideology. Gender ideology is, in short, the contested view that persons may have a gender which is different from their biological sex, and it is opposed by gender-critical persons and organisations such as the Claimant.
5. By this claim, the Claimant seeks declaratory relief in respect of the active participation of civil servants in the Middlesbrough Pride event, wearing t-shirts and carrying flags identifying themselves as members of the Civil Service, which was authorised and/or permitted (and not prevented) by the Defendants. The claim raises an important issue of general public importance concerning the scope of the Civil Service's responsibility to act impartially in the context of contested societal, ideological, or political debates.

B. BACKGROUND

(1) Gender ideology and gender-critical persons

6. Gender ideology is the belief that a person can have a ‘gender’ that is different to their biological sex. It is a deeply contested viewpoint, as recognised, for instance, in the draft Government guidance “Gender Questioning Children: Non-statutory guidance for schools and colleges in England”, Draft for consultation, December 2023, p6:

“... gender identity ideology [is] the belief that a person can have a ‘gender’, whether male (or ‘man’), female (or ‘woman’), or ‘other’, that is different to their biological sex. This is a contested belief. Many people believe this concept is one that reinforces stereotypes and social norms relating to sex.”

7. Gender ideology (sometimes also called ‘gender identity theory’), and the contrary ‘gender critical’ viewpoint, is more specifically explained by Professor Kathleen Stock in her witness statement in support of the claim.¹ Professor Stock summarises gender identity theory as including the tenets that it is gender identity (an inner state invisible to others which may not match one’s biological sex), rather than biological sex, which makes a person a man or a woman (or neither, or both); and that the existence of trans people – that is, those with gender identities incongruent with their biological sex – generates a moral obligation upon all of us to recognise and legally to protect gender identity: [KS/12, 40].
8. She explains that from these tenets derive policy demands of the modern transactivist movement, endorsed by many Pride organisations. Such policy demands include matters such as: a lowering of barriers to getting a Gender Recognition Certificate; the treating of “gender identity” as a protected characteristic in equality law and policy; the automatic “affirmation” of another’s gender identity claims in all contexts (including educational, medical, and judicial contexts); a ban on any kind of therapeutic or clinical engagement which might

¹ The High Court in *R (Miller) v College of Policing* [2020] EWHC 225 (Admin), [2020] 4 All ER 31 described Professor Stock as being of “*impeccable*” “*intellectual pedigree*” (see [241]) and accepted her evidence in that case (see [241]-[250]), as did the High Court in *R (Lindsey Smith) v Chief Constable of Northumbria Police* [2025] EWHC 1805 (Admin), including describing her evidence as “*clear and succinct*” (see [9]-[16]).

express scepticism about persistence of someone's gender identity; increased access to medical intervention for any trans person; access by right for biological males who profess female gender identities into woman-only spaces and groups; and a recognition that biological males who profess female gender identities, and who are also sexually attracted to females, count as "lesbians" and so belong in any dedicated lesbian spaces by right too: [KS/15].

9. She explains that people with gender-critical beliefs, sometimes also known as 'sex realists' typically reject all of the commitments of gender ideology as summarised above, on the basis of believing that biological sex in humans (i) is real and binary, (ii) cannot be changed through surgery or hormonal intervention, (iii) has real and important social and political effects, and (iv) in many contexts is more important than an inner feeling of gender identity. In fact, gender critical people typically deny that everyone has a gender identity: [KS/16]. They tend to argue that sexual orientation, and definitions of 'lesbian', 'gay', 'homosexual' and 'bisexual' are only meaningfully predicated upon attractions between biological sexes (same-sex, opposite-sex, or both), not attractions between gender identities: [KS/17].
10. Gender critical views are, in law, beliefs protected under the Equality Act 2010 and the Human Rights Act 1998: see *Forstater v GDC Europe* [2022] ICR 1. Thus protest against gender ideology, and gender-critical speech, is both lawful and widespread.

(2) The Claimant's experience of the Civil Service

11. Civil servants are required to advise ministers on decisions, including those concerning contested societal, ideological, or political issues. The Ministerial Code (October 2025) at [1.9] provides that: "*Ministers have a duty to give fair consideration and due weight to informed and impartial advice from civil servants*", and [1.8] describes the relationship between ministers and civil servants as "*a partnership underpinned by their common duty of public service as set out in this Code and in the Civil Service Code*". The Civil Service Code (updated 16 March 2015) describes the civil service as "*an integral and key part of the government*" which supports the government "*in developing and implementing its policies, and in delivering public services*". Accordingly, civil

servants are required to advise ministers and the government more widely on how to manage or deal with the expression of those both espousing and rejecting gender ideology. More broadly they must advise ministers and the government on where allocated resources can be deployed without discriminating between those holding different beliefs, which may be in conflict with each other.

12. The Claimant is a charity registered in England and Wales (charity number 1004774) and also in Scotland (number SC039220). It is non-denominational. It exists for the furtherance of the Christian religion in the UK and elsewhere, and is committed to upholding the truths of the Bible in the public square. This includes promoting and defending (a) the biblical understanding of marriage as the exclusive union of one man and one woman for life and the only legitimate context for sexual activity, and (b) the foundational pre-condition for marriage which exists in the biblical distinction between the two biological sexes. The Claimant and its supporters may generally be described as gender critical or sex realist.
13. The Claimant has filed a witness statement from Simon Calvert, its Deputy Director. In it he explains how he is responsible for relationships with parliamentarians and policymakers, and to represent the views and concerns of the Claimant and its supporters to those in Government: [SC/5]. He also explains how he and other of the Claimant's representatives have been engaging with civil servants in the Office for Equality and Opportunity (formerly known as the Government Equalities Office) concerning proposed legislation, including proposals to amend the Gender Recognition Act 2004 to allow for 'gender self-identification' i.e. to permit individuals to change their legal sex without a medical diagnosis: [SC/19]. He has also engaged with civil servants at the Department for Education on issues, such as the ability of church schools to maintain their Christian ethos while conforming with teaching requirements relating to sex and sexual ethics.
14. The Claimant, through its representatives, has sought, and continues to seek, to express its views about these matters to civil servants, politicians and to the public at large. As set out more fully in his witness statement, Mr Calvert believes that the Civil Service are usually unsympathetic to the Claimant's viewpoint, and

certainly less sympathetic than to the viewpoint of those who espouse gender ideology: [SC/81].

(3) The political activities of Pride

15. Pride is a movement that advocates for political, cultural and ideological goals. There is no dispute that Pride itself is entitled to do this. Across the UK there are a number of different Pride organisations who organise different events nationally. As Professor Stock explains at [KS/26-27], in its modern guise:

“many or most Pride organisations have become openly committed to gender ideology ... and to some or all of the commitments also described above as following from gender ideology. Many of the organisations which run Pride marches, and associated events, explicitly endorse attempts to alter existing equality law on their websites in favour of the tenets of gender ideology, publish material which is critical of government policy around trans issues, and lobby supporters to petition government about their preferred causes. As such, these aims go well beyond the original aim of Pride marchers to destigmatise homosexuality and also go beyond bland restatements of current equality law for LGBT people.”

16. These aims are publicly stated by many of the main Pride organisations in the UK. Simply by way of example:

- (1) The Newcastle Pride website shows criticism of the former Conservative government’s policy on trans-related issues. For instance, in a press release describing its march in 2023, it refers to *“young people from schools and community groups from across the region, highlighting their right to be who they want to be, in the face of potential Government discrimination ...”*; to the march as *“highlighting potential new legislation”*; to its director’s belief that there was *“new, harmful, Government guidance on trans young people in schools which risks returning us to the dark days of Section 28”*; and to a purpose of the march as being to *“rise up against further legislative attempts to undermine the community and our rights to live as we are”* [KS/36]. The website states a key principle as *“To protect LGBTQIA+ rights already won and champion these whilst supporting the fight to end equality indifferences (sic) that remain at home and abroad.”* [SC/77]. A T-shirt sold through the online shop for the organisation behind Newcastle Pride carries the slogan: *“Remember Resist Rise Up”*, in a call to protest [SC/77]. That

organisation (Northern Pride Events) also runs a training scheme for professionals which includes the topic “Exploring how Gender Identity and Expression can empower us all” and “how Legislation and Activism impact the creation of safer, more welcoming spaces” [KS/55].

- (2) The Pride in London website contains the ‘Pride Pledge’ that organisations (including the civil service) are required to accept in order *“to take part in any and all Pride in London events”*. The aspects of the pledge include organisations providing to Pride in London *“evidence of their work championing diversity equality and inclusion with regards to... gender identity”*. If an organisation ‘falls short’ of any of the requirements of the Pledge, then Pride in London reserves the right to prohibit their participation *“until the pledges are met”* [SC/74]. The Pride in London website also states its missions as including *“protests against equality”* and to *“Fight for the rights of LGBTQ+ individuals”* [SC/73].

17. In short, Pride organisations are engaged in political activities, including lobbying for changes to existing legislation and institutional policies in favour of those affirmative of gender identity, and trying to persuade supporters that these are worthy aims. This is the opposite viewpoint from that which is taken by gender critical persons or institutions, such as the Claimant.

(4) Civil Service association with Pride

18. The Civil Service has a variety of staff networks. One of these networks is the Civil Service LGBT+ Network (the **“Network”**). This states on its website that it *“acts as the umbrella network for employee voice networks representing LGBT+ staff in individual Civil Service organisations”* and that its *“focus” “is on issues of sexual orientation and gender identity”*.
19. The Network’s webpage suggests that it is the prime organiser for the attendance of civil servants at Pride events across the UK each summer, and the Defendants’ response to the pre-action protocol letter confirmed that such marching takes place *“under the banner of the civil service”*: [SC/63]. Attendance by civil servants at the Pride events in London and Manchester in 2025 was expected to be so popular that civil servants would be selected from a ballot. In

January 2025 the Network's Pride coordinator explained to members that they would have the "*correct stock of Civil Service LGBT+ t-shirts*". From 10 February 2025 onwards civil servants were able to register to join Pride parades in 24 cities across the UK: [SC/63]. Each Pride event had its own Network signup page and a set of detailed instructions.

20. For the Middlesbrough Pride Event on 27 September 2025, the network signup page included the following statements:

"For the Saturday pride, meet up with Martin inside the Town Hall Courtyard, the official muster point for the parade from 11.30 hours until the parade starts at 12.00, he will be wearing his pink T shirt and/or carrying a flag...

T-shirts will be provided as per the registration form which the organiser will bring with him...

Please remember that we are representing the civil service so please respect the CS code of conduct. – Whilst you may wish to attend wearing your CS T-shirt, please bring a change of top for post parade...

The Civil Service LGBT+ Network are planning to attend Pride celebrations at this location. Details for the day will be confirmed here closer to the time...

For any other queries in relation to the Civil Service LGBT+ Network Pride 2025 activities please email the pride co-ordinator - pride2025@civilservice.lgbt.

It is important to remember that at Pride events we are [sic] representing the Civil Service and must act in accordance with our rules and code."

21. Accordingly, the Network which was organising the attendance of civil servants at the Middlesbrough Pride March expressly considered them to be representing the Civil Service and to be bound by the Civil Service Code; and considered that they should wear the pink Civil Service Pride T-shirts (which say 'Civil Service Pride' in large lettering, thereby identifying themselves as members of the Civil Service and associating themselves with Pride) during the march but not afterwards.
22. The Civil Service includes another staff network, called "a:gender". As explained by Mr Calvert, this creates and publishes internal HR guidance and policies within

the Civil Service, including recruitment policies, that indicate support for gender ideology [SC/49].

(5) The Middlesbrough Pride March 2025

23. The Middlesbrough Pride March took place on 27 September 2025 as part of the Middlesbrough Pride Event. As explained by Mr Calvert, civil servants took part in the March wearing the pink Civil Service Pride T-Shirts and carrying pink civil service Pride flags (which also say 'Civil Service Pride' in large lettering, and 'a:gender') supplied by the Network: [SC/79]. Civil Servants wearing the pink Civil Service Pride T-Shirts also carried various different kinds of Pride flags, including the rainbow flag and the Progress flag (the light blue, light pink, and white sections of which, as Professor Stock explains, represent transgender and non-binary people, in replication of the colours of the 'transgender pride flag' created in the US: [KS/48]).

(6) The impression given by civil servants' marching in the Middlesbrough Pride March 2025

24. Mr Calvert describes the impression that civil servants marching in the Pride March conveyed to him at [SC/80-82]:

"Since the Pride movement, and the a:gender organisation, is manifestly political in intent and image, as is the use of Pride and Progress Flags, allowing civil servants to campaign for Pride in this way, under the banner of the Civil Service, creates the impression the Civil Service is institutionally ideologically aligned with, or should be aligned with, this cause. It signals to me, and I believe would signal to many people, including gender critical people, a political association with the political and contested gender ideology viewpoint.

It sends a powerful message to trans activists and others who support gender ideology that the Civil Service are 'on your side'. To people like me who do not agree with gender ideology, the message is equally clear: civil servants are, officially, not sympathetic to your stance, you are unlikely to succeed with any advocacy that does not match this ideology, and you would do well to moderate your behaviour and speech accordingly.

Gender ideology affects the lives of many in this country, as well as the formulation of public policy and the development of the laws that govern the way we live. For the Civil Service actively to associate itself in this way to a cause espousing one side of a heavily contested public debate is a serious

matter for The Christian Institute and for someone like me. Engaging in that debate is important to me, and to The Christian Institute.”

25. This impression is important. As Mr Calvert explains [SC/85]:

“Civil servants are the gatekeepers for ministers and other governmental decision-makers, and meet or correspond with stakeholders to ensure that their opinions are faithfully mediated and represented. Their job is to ensure that all relevant viewpoints are taken into account in policy making and the legislative process. If they are actively campaigning for a cause, then I reasonably think that cause is the lens through which they interpret what I am saying, and the filter they will apply to my engagement. It can too easily affect how I communicate the interests of the Institute and those it represents, even causing me to censor what I say and how I say it. (Indeed, I have to assume it may also be the reason why I often cannot get meetings with ministers in the first place, even on areas where we are clearly stakeholders with relevant expertise.) As a result, this affects what concerns and advice will be communicated to ministers. But it is essential that ministers are fed all relevant information without fear or favour, and that they receive impartial advice. The duty of impartiality on civil servants exists as a mean to ensure that ministers govern in the public interest.”

26. Professor Stock describes the impact which the association of bodies (such as the Civil Service) with the Progress flag and Pride insignia have on her as a gender-critical person [KS/52-53]:

“The Progress flag, with its very recognisable pink and blue elements denoting the Trans Flag, conveys to me and any informed observer a support for gender ideology and not just bland or vague support for trans people. Use of the Progress flag rose to prominence just as gender ideology also rose to prominence within UK LGBT organisations such as Pride in London, Northern Pride, and Stonewall, and was used heavily by all of them in branding and publicity while making demands on behalf of gender ideology. The political association is cemented in my mind, such that – without exaggeration – whenever I see the Progress flag used by an organisation or business, I assume that elements within the organisation are likely to be hostile to gender-critical thought, and also perhaps hostile to my presence as a well-known gender critical figure. The same is true of the Trans flag, although this is generally less widespread. I personally find the near ubiquity of the Progress flag oppressive, knowing what it concretely stands for in practice.

It is clear from my experience that many onlookers recognise the connection and feel as I do about the Progress flag and the Trans flag. I am familiar with a vast range of gender-critical women and men and in my experience they all feel that the use of the Progress flag and the Trans flag

is a shortcut to signal allegiance to gender ideology and the political commitments that this entails. The result is that they tend to feel unwelcome where either of these flags are displayed, and anxious that they are about to be treated unfairly, should their own gender-critical beliefs become known. It is also my impression that in some parts of the wider general public, the use of the Progress flag or the Trans flag has become associated with radical political stances that are rejected by the mainstream.”

27. She adds as follows [KS/62, 65-66]

“I have also reviewed the factual evidence, exhibited by Mr Calvert, showing that Civil Service groups have recently taken part in Pride marches such as Middlesbrough Pride, marching under the banner of the Civil Service, and wearing specially ordered Civil Service T-shirts that identify them as members of the Civil Service to all onlookers. I have also seen photographs of members of the Civil Service marching in Pride marches and waving Progress and Pride Flags.

..

I ask myself what this evidence shows me about the Civil Service’s impartiality when it comes to advising the government of the day on gender-related policies, speech or protest, and engaging with gender-critical or sex-realist stakeholders. To me, it shows that this is an organisation, aspects of which are positively favourable to or supportive of, or at the very least more sympathetic towards, gender identity theory and its political objectives than to a gender-critical viewpoint. I find it difficult to believe that an organisation whose employees actively, visibly associate with Middlesbrough Pride would treat stakeholders expressing objections to gender identity theory in the same way as those supportive of it. Should a conflict of interest arise between these two kinds of stakeholder, I would not have confidence that the Civil Service would treat the matter impartially.

For me, the sight of the Civil Service associating itself with the obviously political and contested Pride movement conveys support for gender identity theory. If that is not the Civil Service’s intention, it is certainly its effect. It suggests to me that elements of the service are likely to favour gender identity theory over gender-critical stances, and to therefore be partisan when it comes to managing conflicts around criticism of gender identity theory; and I know that many other gender-critical people feel similarly.”

(7) The responsibility of the Defendants for the activities of the Civil Service

28. In their pre-action protocol response letter dated 12 September 2025, the Defendants accepted that the Minister for the Cabinet Office “*has overall*

administrative responsibility for the management of the civil service, on behalf of the Minister for the Civil Service” (at [1]).

29. The pre-action response also explained (i) that although some civil servants attend Pride through groups organised by their individual government department, others attended “*under the banner*” of the Network; (ii) that the Network benefits from funding decisions at ministerial level which are, in practice, delegated to permanent secretaries; (iii) that the Network benefitted from a funding decision that was delegated by the Minister of the Cabinet Office to the Permanent Secretary to the Cabinet Office; and (iv) that, following that funding decision the Network proceeded (see [8.19]-[8.20]).
30. The letter also sought to characterise the decision under challenge as being the funding decision (see [8.20], [8.23.1]). That is not correct. The Claimant’s challenge is to the Defendants authorising and/or permitting (and not preventing) the active participation of civil servants, wearing t-shirts and carrying flags identifying them as members of the Civil Service, in the Middlesbrough Pride March 2025. There is no reason why that cannot be a legitimate target for a claim for judicial review, in the same way as in *R (Lindsey Smith) v Chief Constable of Northumbria Police* [2025] EWHC 1805 (Admin) the challenge was to the Chief Constable of Northumbria Police Force’s authorising police officers to participate, and not preventing them from participating, in the ‘Newcastle Pride in the City 2024’ event.

C. LEGAL FRAMEWORK

(1) The impartiality duty on civil servants

31. Civil servants are employed by the Crown. The management of civil servants was, until the Constitutional Reform and Governance Act 2010 (“**CRAGA**”), an exercise of the royal prerogative.
32. Section 3(1) provides that “*The Minister for the Civil Service has the power to manage the civil service*”.
33. Section 5 CRAGA provides that the Minister for the Civil Service must publish a code of conduct for the civil service, not including members of the civil service

already excluded under CRAGA and not including the diplomatic service (the “Civil Service Code”). It states as relevant:

“5 Civil service code

(1) The Minister for the Civil Service must publish a code of conduct for the civil service (excluding the diplomatic service).

...

(4) In this Chapter “civil service code” means a code of conduct published under this section as it is in force for the time being.

(5) The Minister for the Civil Service must lay any civil service code before Parliament.

...

(8) A civil service code forms part of the terms and conditions of service of any civil servant covered by the code.”

34. Section 7 CRAGA then states as relevant:

“7 Minimum requirements for civil service and diplomatic service codes

(1) This section sets out the provision that must be included in a civil service code or the diplomatic service code in relation to the civil servants covered by the code. (The code may include other provision as well.)

(2) The code must require civil servants who serve an administration mentioned in subsection (3) to carry out their duties for the assistance of the administration as it is duly constituted for the time being, whatever its political complexion.

(3) The administrations are—

(a) Her Majesty's Government in the United Kingdom;

(b) the Scottish Executive;

(c) the Welsh Assembly Government.

(4) The code must require civil servants to carry out their duties—

(a) with integrity and honesty, and

(b) with objectivity and impartiality.”

35. Thus, the Civil Service Code forms part of the terms and conditions of service of any civil servant to whom it applies (s.5(8)), and must require civil servants to carry out their duties with both impartiality (s.7(4)(b)) and political impartiality (s.7(2)).

(2) The Civil Service Code

36. The Code is issued by the Minister for the Civil Service and was most recently revised in March 2015. Among other things, it requires civil servants to act with “*impartiality*”. It states, as relevant:

“The Civil Service is an integral and key part of the government of the United Kingdom. It supports the government of the day in developing and implementing its policies, and in delivering public services. Civil servants are accountable to ministers, who in turn are accountable to Parliament.

As a civil servant, you are appointed on merit on the basis of fair and open competition and are expected to carry out your role with dedication and a commitment to the Civil Service and its core values: integrity, honesty, objectivity and impartiality. In this code:

...

‘impartiality’ is acting solely according to the merits of the case and serving equally well governments of different political persuasions.

These core values support good government and ensure the achievement of the highest possible standards in all that the Civil Service does. This in turn helps the Civil Service to gain and retain the respect of ministers, Parliament, the public and its customers.

This code sets out the standards of behaviour expected of you and other civil servants. These are based on the core values which are set out in legislation. Individual departments may also have their own separate mission and values statements based on the core values, including the standards of behaviour expected of you when you deal with your colleagues.

Standards of Behaviour

...

Impartiality

You must:

- carry out your responsibilities in a way that is fair, just and equitable and reflects the Civil Service commitment to equality and diversity

You must not:

- act in a way that unjustifiably favours or discriminates against particular individuals or interests”

37. Thus the Code requires civil servants to act impartially. This includes that they must not act in a way which unjustifiably favours or discriminates against particular individuals or interests.
38. Separately, the Code also requires civil servants to act with political impartiality, which is a different and specific kind of impartiality. It states, for instance, “*You must serve the government, whatever its political persuasion, to the best of your ability in a way which maintains political impartiality and is in line with the requirements of this code, no matter what your own political beliefs are*” and “*You must not allow your personal political views to determine any advice you give or your actions*”. The distinction in the Code between impartiality and political impartiality is consistent with the distinction in s.7 CRAGA, between impartiality (s.7(4)(b)) and political impartiality (s.7(2)).
39. At [8.13] of their pre-action response, the Defendants argued that the duties of impartiality under the code were not amenable to judicial review, apparently on the basis that the duties form part of the civil servant’s employment contract. That contention is incorrect. The Code is issued by a public entity (the Minister for the Civil Service), exercising his powers under a statutory scheme, to civil servants whose role it is to exercise public functions. It is amenable to judicial review accordingly: see *R (Shashikanth) v NHS Litigation Authority* [2024] EWCA Civ 1477, [2025] WLR 2333 per Lewis LJ at [43] (“*if a person or body is exercising power derived from statute ... the person or body is generally assumed to be exercising public functions*”) and [44] (“*the courts may have regard to the nature of the function being performed to determine whether that function has a sufficient public element such as to make it amenable to judicial review*”).

(3) *Lindsey Smith*

40. *Lindsey Smith* concerned a challenge to the participation of the Northumbria Police Force at the Newcastle Pride March which took place on 20 July 2024. Police officers took part in the march as active participants, in their police uniforms, and stationed a police van marked up in the colours of the Progress flag. The Claimant, who was a gender critical lesbian, argued that the participation by officers in this way, was contrary to their duties of impartiality and unlawful (see [4]). Each officer is required to make a declaration on their appointment that they will serve in their role with impartiality (see [61]), and officers were required by legislation and by their College of Policing Code of Ethics to, in summary, refrain from activities likely to interfere with the impartial discharge of their duties or which is likely to give that impression (see [62]-[67]).
41. Linden J upheld the claim, finding that (see [130]):

“it was contrary to the uniformed officers’ duties of impartiality and, indeed, the Defendant’s own duty of impartiality, to participate in the 2024 March in the way that they did. I accept the evidence filed on behalf of the Claimant, summarised in more detail above, that Northern Pride clearly and strongly supports gender ideology and transgender rights and it campaigns accordingly, including for changes in law and policy which reflect its views. The 2024 March was, at the very least, partly organised as part of Northern Pride’s campaigning activities and to promote that agenda. Those who do not agree with the position of Northern Pride on transgender rights are not welcome on marches organised by Northern Pride. The participants in the March also appear to share the beliefs of Northern Pride and to support the aims of the transgender community. They marched, at least partly, because they wanted to demonstrate that this was the case and to express their support for the LGBTQIA+ cause. It is not necessary to describe this aspect of the March as “political” for the Claimant to succeed, but that is what it was.”

42. Linden J also concluded at [131] that (italicised emphasis in the original):

“If one then asks whether the officers’ activity of taking part in the March was likely to give rise to the impression amongst members of the public that it may interfere with their ability to discharge their duties impartially ... the answer seems to me clearly to be “yes”. A key reason for taking part in the March was publicly to support the beliefs and aims which the March represented and sought to promote, and this was as true of the police officers who did so as it was of any other marchers. Moreover, the fact that they wore their uniforms, marched as a contingent, and carried the Police

Pride and other flags demonstrated their support for the cause *as police officers.*”

43. He also noted that *“It is easy to fall into the trap of thinking that views with which one agrees are or must be uncontroversial”* (see [112]).

D. GROUND OF CLAIM

44. From the Defendants’ pre-action response at [8.19]-[8.20] it appears to be common ground that the Defendants authorised and/or permitted (and did not prevent) civil servants to engage in certain activities in the Middlesbrough Pride March, and did not prevent such activities, which took place on 27 September 2025.
45. Specifically, the activities of civil servants were or included:
- (1) marching in the parade as active participants, wearing T-shirts and carrying flags identifying themselves as members of the civil service, and displaying imagery indicative of support for the gender ideology cause including the Progress flag); and
 - (2) associating thereby, and in any event, with the gender ideology cause and support for it, whether conveyed in written form (such as on a sign or on a t-shirt, including by referring to the a:gender organisation), or by means of imagery indicative of that cause (such as the Progress flag).
46. Those activities unjustifiably favoured the gender ideology cause or viewpoint or the interests of those who espouse it and/or discriminated against those who oppose that cause, viewpoints or interests. The activities were not simply to show support for LGBTQ+ persons in a general way; they associated the civil servants specifically with the gender ideology cause, viewpoint or interests embraced by Pride which are contested in society and a matter to which Government policy can and does relate. Members of the public would have and did receive the impression that the Civil Service was supportive of the gender ideology viewpoint, cause or interests by association, or was at least more sympathetic to those who espouse that ideology than to those in opposition.

47. The Defendants' authorising and/or permitting (and not preventing) the above activities was in the premises unlawful. It was an exercise of their powers which put civil servants in breach of the requirement in the Civil Service Code that they should act impartially. It was ultra vires, on the basis that it was not within the Defendants' powers to authorise activity in breach of the Code, or outcome irrational, on the basis that it was not open in the circumstances to the Defendants to authorise activity in breach of the Code, or was alternatively process irrational: *R (KP) v Secretary of State for Foreign, Commonwealth and Development Affairs* [2025] EWHC 370 (Admin).
48. The Defendants only briefly addressed the substance of the Claimant's argument in their pre-action response. Their position seems to be that any duties of impartiality on civil servants were limited to political impartiality only: see [8.10], [8.12] and [8.17] of the pre-action response. That is wrong. As explained above, the Code imposes separate duties in respect of both political impartiality (e.g. *"You must serve the government, whatever its political persuasion, to the best of your ability in a way which maintains political impartiality and is in line with the requirements of this code, no matter what your own political beliefs are"*) and impartiality (e.g. *"You must not act in a way that unjustifiably favours or discriminates against particular individuals or interests"*). That is consistent with the statutory wording, which differentiates between the two at s.7(2) and s.7(4)(b) CRAGA. There is no warrant to collapse this clear distinction.

E. RELIEF

49. In light of the above the Claimant seeks:
- (1) a declaration that the above activities of civil servants during the Middlesbrough Pride March 2025, and the decision of the Defendants that civil servants could or should participate in such activities, were unlawful;
 - (2) such further or other relief as the Court may see fit to grant; and
 - (3) costs.

TOM CROSS KC

OLIVER JACKSON

11KBW

On behalf of: Claimant
Witness: Simon Calvert
Number of Statement: 1st
Date: 12/17/2025

Claim no:

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
ADMINISTRATIVE COURT

BETWEEN:

**THE KING on the application of
THE CHRISTIAN INSTITUTE**

Claimant

-and-

**(1) MINISTER FOR THE CIVIL SERVICE
(2) MINISTER FOR THE CABINET OFFICE**

Defendants

WITNESS STATEMENT OF SIMON CALVERT

I, Simon Calvert, of Wilberforce House, 4 Park Road, Newcastle upon Tyne, NE12 8DG, will say as follows:

1. I make this statement in support of the Claimant's application for judicial review.
2. I make this statement on the basis of my own knowledge and experience and on the basis of documents shown to me. This witness statement has been prepared through email exchanges and conferences with solicitors. Insofar as the contents of this statement are within my own personal knowledge, they are true, otherwise they are true to the best of my knowledge, information and belief.
3. This witness statement is provided along with a bundle of publicly available documents which are exhibited to this statement. Where it is necessary for me

to refer below to an exhibited document, I use the form [SC1/x] to denote the exhibit in which that document appears.

4. In this statement I describe:

- a. my background and The Christian Institute;
- b. the beliefs and values of The Christian Institute;
- c. the work of The Christian Institute and its interaction with the Civil Service;
- d. the Civil Service LGBT+ Network;
- e. the Civil Service a:gender network;
- f. Civil Service participation in Pride marches; and
- g. the consequence of Civil Service participation in Pride marches.

My background and The Christian Institute

5. I am Deputy Director at The Christian Institute, the Claimant in these proceedings, with responsibility for public affairs. In that capacity, I am responsible for developing constructive relationships with parliamentarians and policy makers and representing the views and concerns of the Institute and its supporters to those in Government, Parliament and the devolved institutions. I trained as a solicitor, and have been employed by the Institute for nearly 30 years.
6. The Christian Institute is one of the largest organisations in the country representing evangelical Christians and the churches that they attend. It exists as a charity to promote the Christian faith and advance education in the UK and elsewhere. It does this through its research, publications and public meetings (approximately 400 a year), and through public advocacy, media commentary, and the provision of legal assistance. The Institute speaks out on issues such as religious liberty, the sanctity of life, marriage and family, and parental rights. It is a nondenominational Christian charity with more than 60,000 supporters throughout the UK, including more than 5,000 churches.

The beliefs and values of The Christian Institute

7. The Christian Institute is committed to upholding the truths of the Bible in the public square. This includes promoting and defending (a) the biblical understanding of marriage as the exclusive union of one man and one woman for life and the only legitimate context for sexual activity, and (b) the foundational pre-condition for marriage which exists in the biblical distinction between the two biological sexes (Genesis 1:27 and 2:24).
8. The Institute and its supporters believe that 'gender identity' should not be treated as a concept independent from (or, if it must be used at all, should only be understood to be coterminous with) a person's biological sex. The Institute and its supporters consider that the Bible teaches that the reality of masculine or feminine gender is not separate from the sexually dimorphic form of people's bodies. Rather, gender is rooted in and flows from the male or female biological sex of the body.
9. The Institute and its supporters therefore consider that the meaning of sex and gender, rooted in the biological form of human bodies, is not incidental, but intrinsic to humanity's reality as creatures defined not by themselves, but by God the creator.
10. The consequence is that, for the Institute and its supporters, the reality of a person's bodily form, including their sex and gender at birth, is not malleable. Rather a person's bodily sex has enduring, God-given, and God-defined ontological significance, regardless of that person's own feelings or preferences.
11. The Institute (and its supporters) may thus be described as gender-critical or sex-realist, in that they believe that a person cannot have a 'gender' that is different from their biological sex.
12. I have read the draft evidence of Kathleen Stock, served on behalf of the Claimant in these proceedings, and can confirm that the Institute agrees with the

explanation that she gives at paragraphs 16 to 18 concerning gender-critical beliefs.

13. Indeed, the Institute seeks to uphold the right to express gender-critical beliefs, together with conventional Christian views about marriage and sexual ethics. The Institute holds that gender ideology is damaging in reinforcing controversial stereotypes relating to sex, and in derogating from certain women's rights (e.g. as regards natal male access to female only prisons, rape crisis centres, or female sports). The Institute also considers that gender ideology brings grave risks to the physical and mental health of children and young people, including experimental medical treatment with hormones and gender reassignment surgery.
14. For the Institute and its supporters, the consequences for children and their families of Government policies on matters relating to gender ideology, marriage or sexual ethics are of the most profound significance. Examples of this include policy areas which engage safeguarding duties, or the role of parents, or the potential exposure to harm through medicalised approaches to gender dysphoria, or, indeed, freedom of speech to discuss these matters.

The work of The Christian Institute and its interaction with the Civil Service

15. The Institute has a long history of engaging with the Government and the Civil Service concerning legislative and regulatory matters which affect, among other things, free speech, freedom of religion, education, marriage, and the family.
16. A recent example of this is our lengthy dialogue with the Office for Equality and Opportunity (OEO), formerly known as the Government Equalities Office (GEO). The OEO is based in the Cabinet Office and has specific responsibility for equality policy and legislation. It is led by the Minister for Women and Equalities.
17. Since 2018 I and colleagues in the Institute have engaged with civil servants and with ministers concerning proposed legislation outlawing 'conversion therapy' and its implications for the freedom of Christians across the UK to continue

mainstream religious practice, including the teaching of biblical doctrines relating to human sexuality.

18. In January 2025 we attended a meeting with Anneliese Dodds, the then Minister for Women and Equalities. The meeting took place in her office at the Foreign, Commonwealth and Development Office. A number of civil servants were in attendance, including two advisers and two people from the Equalities Hub, one of which explained that she was the 'sherpa' responsible for the preparatory work on the legislation relating to the proposed ban on conversion therapy.
19. Similarly, colleagues and I have attended meetings with civil servants on other issues which relate to gender ideology. For example, on 19 November 2018 we attended a meeting at the GEO. This took place at the Department for Education and Equalities at Sanctuary Buildings, Great Smith Street. This meeting took place against the backdrop of the then Government proposing to amend the Gender Recognition Act 2004 ("GRA 2004") to allow for 'gender self-ID'. 'Gender self-ID' refers to the policy proposal to lower the current requirements for getting a Gender Recognition Certificate, such that simply a statement professing a different gender identity to one's sex would be the only requirement. The meeting was attended by civil servants including the GRA Consultation lead from the GEO LGBT Team.
20. The matter of gender recognition is one about which the Institute has long had concerns. I was similarly involved over twenty years ago, engaging with civil servants leading up to and during the passage of the GRA 2004.
21. I and other Institute representatives have also had other meetings with civil servants at the Department for Education over the years. This has involved discussing various education related issues, including, for example, the ability of church schools to maintain their Christian ethos and while conforming with teaching requirements relating to sex and sexual ethics.
22. I recall one occasion when I attended the Department for Education with several colleagues from the Institute. I cannot remember the date or the issue we were there to discuss. But what does stand out in my memory (and also the memories

of my colleagues) is our surprise and shock at seeing an installation of large Pride flags stuck to the glass walls of the lift block on every floor, which meant that viewed from the atrium looking up to the roof there was the impression of a single Pride flag stretching all the way from the ground floor to the top floor. It completely dominated the appearance of the building when viewed from inside. My colleagues and I all remarked on it to one another when we left the meeting because we were so surprised at what we had seen.

23. Over the last decade or so it has also become standard practice for many civil servants to wear lanyards with the Pride flag on them ("Pride lanyards"), so that when I had meetings, some or all of the civil servants in the meeting would wear them.
24. I recall at one particular meeting being with representatives of other faith groups on one side of the table. The Civil Service team on the other side of the table were wearing Pride lanyards. In addition, when they sat down and pulled their laptops out of their bags and opened them up on the table in front of us several of the laptops had large Pride flag stickers on the back of the screen. So there was an array of Pride flags facing us.
25. I have acquaintances who work in the Civil Service (across different departments) who hold to Christian or gender critical beliefs. I understand from those acquaintances that they are generally afraid to disclose to colleagues where they differ from what they perceive as the required ideological stance. They often choose to work on policy areas which enable them to avoid conflict with this ideology.
26. My perception of meetings with civil servants is that they are usually willing to hear what we have to say. I should emphasise that, generally, they are cordial to me personally, and some are friendly. Some are open and constructive. But at other times, particularly when it comes to the ideology and policies associated with the Pride movement, some civil servants will bristle at statements of orthodox Christian beliefs around gender and will push back by advancing views that align with gender ideology. They appear to be surprised at what Christians believe. This is so much so that I've spent a significant amount of time in recent

years trying to remedy the apparent religious illiteracy of many civil servants, including by writing lengthy papers to civil servants explaining basic Christian beliefs in relation to sexual ethics. The pre-supposition held by many civil servants which I have to seek to rebut is that our traditional Christian beliefs are 'harmful'. For example, we made a concerted effort with the Ministry of Housing, Communities and Local Government, when that department held the "faith brief", by offering to do cross Whitehall religious literacy training. But despite initial enthusiasm from the civil servant I was speaking to, I was subsequently told that the idea had been rejected by her superiors.

27. I cannot be sure of the precise motivations of each civil servant for displaying Pride symbols at work. However, the act of wearing a Pride lanyard, displaying a Pride flag on a laptop, or decorating the department with a Pride flag, communicates to me that they are more likely to be aligned with Pride and its ideology and associated policy positions, and less likely to support my own beliefs and those of other Christians who we represent. This is regardless of how cordial they may be to me personally.
28. Let me provide an example to illustrate the point. Suppose a representative of an oil company meets with civil servants to discuss changes to energy policy, and the civil servants are wearing Greenpeace or "Just Stop Oil" lanyards. That would be highly inappropriate and unprofessional. It would, at the very least, suggest that the civil servants had adhered to a particular cause, viewpoint, or set of interests, and would reasonably suggest that they had prejudged the issues which the company representative had come to discuss.

The Civil Service LGBT+ network

29. As I understand it, the influence of gender ideology on the Civil Service, including in particular the Civil Service LGBT+ network (which I refer to as the "**Network**"), began under the influence of the campaigning charity called Stonewall.

Stonewall's influence on the Civil Service

30. Stonewall describes itself in the following terms [SC1/1]¹:

“Over the last 35 years, we have helped create transformative change in the lives of LGBTQ+ people in the UK. Our work has driven positive change in public attitudes and public policy and there are now over 3000 LGBTQ+ organisations across the UK.

We deliver campaigns, programmes, and policy work that is focused on achieving deep, sustainable change, through convening, collaboration, and conversation.

We support parliamentarians and lawmakers; design policies and campaigns and deliver programmes and services which focus on achieving equal rights for LGBTQ+ people.”

31. Stonewall has been highly influential in setting organisational policy in this area. It was founded in 1989 to campaign for the repeal of Section 28, and at that point was interested only in defending lesbian and gay rights. Over the years its remit has expanded.
32. Since 2001, the Stonewall Diversity Champions scheme for employers (now renamed ‘Proud Employers Programme’) has been a key part of its operations. Organisations pay to join and are then permitted to use the Stonewall logo on company promotional material, and get access to certain informational resources. Members of the programme have their internal policies reviewed for how well they adhere to gender ideology and its corresponding policy commitments. Organisations can also enter the Stonewall Workplace Equality Index, an annual competition which ranks companies in terms of how well they meet Stonewall “inclusivity” goals. Oxford University describes the Index as “a powerful evidence-based benchmarking tool to assess an organisation’s work on

¹ <https://www.stonewall.org.uk/about-us/who-we-are>

LGBT equality against Stonewall's best practice and others in the sector"
[SC1/2]².

33. Individuals who are labelled as "Diversity Champions" are also encouraged to set up LGBT+ staff networks in their organisations, which are then closely associated with Stonewall. Members of such staff networks are encouraged to promote Stonewall's current campaigning objectives and preferred policies within their organisations.
34. In the past ten years, much of Stonewall's campaigning has been directed towards furthering the theory and policy commitments of gender ideology. It has produced several campaigns and sets of briefing documents which explain to members how to achieve Stonewall goals in this regard. This includes campaigning on matters such as self-ID; changes to bathroom, changing room, and prison policies; changes to sports policies; against so-called "conversion therapy" for gender identity; and other commitments distinctive of the cause, as already described above.
35. Many Civil Service organisations are or have been members of the Stonewall Diversity Champion Schemes and participated in the Workplace Equality Index³. These included those Civil Service organisations associated with government departments such as the Cabinet Office; Department for Business; Energy & Industrial Strategy; Department for Digital, Culture, Media & Sport; Department for Education; Department for Environment, Food & Rural Affairs; Home Office; Department for International Trade; Department for Transport; Department for Work and Pensions; Department of Health; Foreign & Commonwealth Office; Government Equalities Office; Ministry for Housing, Communities and Local Government; and Ministry of Justice. Many local government organisations were also signed up to the scheme.

² <https://edu.admin.ox.ac.uk/stonewall-workplace-equality-index>

³ <https://civilservice.blog.gov.uk/2016/01/21/civil-service-among-the-best/>

36. Some of these organisations have since withdrawn from the scheme due to adverse publicity or cost-cutting⁴, but it is likely that Stonewall’s historical influence will still be present. This is not least due to the ongoing activities of the Civil Service LGBT+ Network and the Civil Service a:gender network, as I explain later in this statement.

The Civil Service LGBT+ Network

37. The Civil Service has a broad variety of staff networks. The Cabinet Office listing of these networks [SC1/3]⁵ states that these networks “*offer help and support to civil servants and raise awareness of some of the barriers faced by our underrepresented groups*”.
38. In their most recent missive published on the Network’s website, the Network’s chair reminded its members of the Network’s mission to ‘shape’ the Civil Service [SC1/4]:⁶

“As we look to the future, we do so with hope and determination. Pride Month is a time to celebrate how far we’ve come, but also to acknowledge the work that remains. While we continue to make progress, we know that for many in our community, the path is not always easy.

In subtle ways, we are reminded that visibility still matters. That inclusion is not a given, but a practice. And that our values, when lived out with empathy and courage, can help shape a Civil Service that truly reflects the society it serves.

..

As we move into July, we will carry the spirit of Pride with us, not just as a celebration, but as a commitment. A commitment to each other, to our values, and to the kind of workplace, and world, we want to build.”

39. The Network team pledges to “develop policy, organise and deliver social, networking and learning events, and promote diversity and inclusion of LGBT+

⁴ <https://sex-matters.org/about-us/what-we-are-up-against/keeping-track-of-stonewall/>

⁵ <https://www.gov.uk/government/publications/civil-service-staff-networks>

⁶ <https://www.civilservice.lgbt/news/2025/06/06/chairs-eye-view-june/>

staff” [SC1/5].⁷ The Network “acts as the umbrella network for employee voice networks representing LGBT+ staff in individual Civil Service organisations” and its “focus ... is on issues of sexual orientation and gender identity” [SC1/6].⁸

Activities

40. The Network arranges a broad range of social, networking, learning and development events taking place within the Civil Service across the UK [SC1/5].⁹
41. By way of example, this summer the Network announced that the Home Office LGBT+ network were hosting events that included the following [SC1/4, page 3]¹⁰.

“A History of Pride as Protest”, reminding us of the roots of the movement and the resilience that continues to drive it forward.

Civil Service Responding to Social Change” is a combined event hosted by Natural Resources Wales, the Health and Safety Executive, and the Welsh Government.”

42. The Network website pages also have extensive coverage of Civil Service LGBT+ mentoring programs and “Allyship” initiatives. The Network often encourages civil servant colleagues to be “allies” – which in effect means adopting Stonewall’s campaigning goals – and to signal their support for gender ideology. This talk of “allies” found in staff networks directly echoes Stonewall language about “engaging” good “allies”¹¹; or establishing “LGBTQ+ Allyship”¹².

⁷ <https://www.civilservice.lgbt/about/>

⁸ <https://www.civilservice.lgbt/rules/constitution/>

⁹ <https://www.civilservice.lgbt/events/>

¹⁰ <https://www.civilservice.lgbt/news/2025/06/06/chairs-eye-view-june/>

¹¹ https://files.stonewall.org.uk/production/files/setting_up_an_lgbt_employee_network_group.pdf?dm=1758038727

¹² https://files.stonewall.org.uk/production/files/introduction_to_lgbtq_allyship_-_post_session_resource.pdf?dm=1727899225

43. For instance, a Civil Service blog post currently hosted on the government website, entitled “The importance of LGBT+ allies” [SC1/7]¹³, urges colleagues to *“Be a visible ally. Wear a rainbow, trans flag, intersex flag or non binary lanyard. Write in your email signature that you’re proud to be a LGBT+ ally and link to your Department LGBT+ Network”*. This is language indicative of support for the commitments of gender ideology.
44. The Civil Service LGBT+ Network website also has a number of posters that visitors can print off for “Allies week” [SC1/8]¹⁴, including *“Good allies lobby for gender-inclusive facilities in their offices”, “Awesome allies make sure their department’s policies are LGBT+ inclusive” and “Brilliant allies tackle homophobic, biphobic and transphobic behaviours in their teams”*. These too indicate support for gender ideology and the policy commitments associated with it.
45. A Civil Service LGBT+ Network “factsheet” called “Allies” says: *“You can join and support your department’s LGBT+ Network and take-action in solidarity alongside your LGBT+ colleagues. You can be visible and encourage work to be a safe space by attending LGBT+ events, wearing a rainbow lanyard or putting posters up”* [SC1/9]¹⁵. A friend who is a civil servant explained to me that he would find himself on the internal distribution lists for “allies” emails even though he had not opted in and did not agree with them.
46. I have been informed by a civil servant working at HMRC (who does not wish to be named, out of fear of adverse consequences) that members of the Network and its local affiliates in different departments of the Civil Service organise and deliver training to HMRC civil servants on a diverse array of topics including mandatory training on “Inclusive Workplaces” and training on use of preferred pronouns.

¹³ <https://civilservice.blog.gov.uk/2021/01/18/the-importance-of-lgbt-allies/#:~:text=Understand%20the%20difference%20between%20gender,to%20your%20Department%20LGBT%2B%20Network.>

¹⁴ <https://www.civilservice.lgbt/publication/civil-service-allies-week-posters>

¹⁵ <https://www.civilservice.lgbt/documents/store/factsheets/allies.pdf>

47. These are a small illustration of the extensive ideological activities of the Network and are matters of concern for gender critical civil servants who do not share the adherence to gender ideology that underpins these activities, yet feel the weight of institutional expectation that they should toe the line.

The Civil Service a:gender network

48. There is another Civil Service staff network named “a:gender” which describes itself as supporting “*trans and intersex people across government*”. It warrants further discussion here because, as I explain below, the pink Civil Service Pride T-shirts worn by those attending the Pride marches during 2025 in their capacity as civil servants (including the Middlesbrough Pride march) featured the Civil Service LGBT+ Network logo, and the logo of a:gender, on their back.
49. The a:gender website can be found at www.agender.org.uk [SC1/10]¹⁶. One of the stated aims of a:gender is to “embed a culture of inclusion for trans and intersex people in the Civil Service, through: representation, collaboration, and assurance”.¹⁷ On its “For Employers” page the site states:

“For Employers

We help Civil Service departments and agencies provide a safe and welcoming environment for trans and intersex colleagues by:

- creating and delivering workplace training and awareness sessions across the Civil Service
- provide expert advice, guidance and support to staff and policy owners across the Civil Service to develop their trans and intersex inclusive policy
- producing and regularly updating our workplace guide to basic compliance requirements and best practice for staff and managers
- attending and liaising on internal meetings with Civil Service departments and external meetings on behalf of the Civil Service,

¹⁶ <https://www.agender.org.uk/our-aims/>

¹⁷ <https://www.agender.org.uk/our-aims/>

such as with providers of support for trans and intersex people (e.g. GIRES, Stonewall, Mermaids)

- offering advice and support to all staff through our executive committee and regional representatives.”¹⁸

50. The a:gender website contains a “terminology” page [SC1/11], which includes statements aligned with gender ideology such as “Gender is part of a person’s inherent and persistent understanding of who they are”.

51. The page continues to describe what transphobia is:

“Transphobia is the fear, dislike or hatred of a person because they are perceived to have a trans background, or because they associate with someone perceived to have a trans background.

Transphobia can be expressed in many ways but if this is by direct or indirect exclusion, discrimination or other detrimental treatment then it is likely to be against the Equality Act. However, transphobia is often expressed in ways that are difficult to explicitly call out as such. Examples include misgendering, which is when a person deliberately uses incorrect personal pronouns, or other language that denies a person’s gender, or deadnaming, which is the deliberate use of a person’s previous name after they have changed it as part of their transition. Other scenarios include deliberately spreading misinformation under the guise of wider concerns around safety or propriety, but where the hidden intention is to either ridicule trans people, deny their validity, or portray them as a threat to others”.

52. This places any gender critical person, who denies that biological sex can be changed, into the ‘transphobic’ category should they wish to stay true to their deeply-held convictions and use biologically appropriate pronouns.

¹⁸ <https://www.agender.org.uk/for-employers/>

53. A further page on the a:gender website [SC1/12] explains that “Allies are friends, relatives and colleagues who support our aims and objectives. Our allies stand up for trans and intersex people within the workplace, support our full members and spread the word about a:gender. Together we can remove barriers and become agents for positive change.”
54. Another a:gender page titled “How to Make A Difference” [SC1/13], which provides guidance on how to be a “good ally”, states that allies can “Display and distribute stickers, coasters, lanyards and contact cards at your workplace”, and “challenge transphobia”, potentially including the use of ‘incorrect’ pronouns in the workplace as per their own definition.
55. This material shows that a:gender is not presented merely as a neutral support group but as an internal campaigning or lobbying network, encouraging the active promotion of its aims and messaging throughout Civil Service workplaces.
56. As noted above, a:gender states that it creates and delivers workplace training and gives expert advice, guidance and support to staff and policy owners across the Civil Service to develop their trans and intersex inclusive policy. In particular, a:gender has produced two major policies that were adopted by the Office for National Statistics, the Insolvency Service, the Food Standards Agency and other departments of the Civil Service: The Workplace and Gender Reassignment guide (the “**Workplace Guide**”) [SC1/14] , and the Gender Identity and Intersex Model Policy Package (the “**Policy Package**”) [SC1/15].
57. The Workplace Guide was first published in May 2014, updated in February 2016 and removed from the gov.uk website in March 2019. It contained a large number of statements that indicate support for gender ideology. For example:
 - a. On page 6 the Guide stated: “*Gender consists of 2 related aspects; gender identity: A person’s internal perception and experience of their gender; gender expression: The way a person behaves and lives in society and interacts with others, based on their gender identity, to live within the binary gender role (male or female) recognised by society.*” It

continued: *“Acquired or affirmed gender is used to describe the person’s gender role after reassignment.”* It then describes “gender identity” as the psychological identification as male or female.

- b. At page 23 of the Guide, those holding gender critical views in relation to gender reassignment were criticised: *“gender reassignment is a subject about which some individuals hold hostile views based on personal conviction, out of ignorance or, sometimes, prejudice”*.

I should emphasise how much I am troubled by this statement. I do not consider my views or the views of the Institute, which stem from traditional Christian teachings, to be ‘hostile’ or to be held out of ‘ignorance’ or ‘prejudice’. It concerns me greatly that this is the kind of internal guidance that is being considered by civil servants that I have meetings with, and that advise governmental decision-making.

- c. In the section related to ‘Single Sex Facilities’ on page 31, the Guide stated that a transsexual person would usually begin using the facilities which align to their new gender role from the date of transition, and that *“it would be humiliating, inappropriate and undermining to expect a person in their acquired gender to use toilet facilities of their birth sex or indeed be restricted to the use of the accessible toilet.”*
- d. The criticisms of gender critical persons continued in this section: *“Any continued objection or inappropriate comments by work colleagues to the use of the facilities appropriate to the gender of transition should be seen as unreasonable (discriminatory) and should be met with communication, discussion and education before the situation gets out of hand. In this sometimes contentious area, transsexual employees are entitled to expect support from management.”*

- 58. In an update on the gov.uk website in March 2019 [SC1/16] civil servants were told:

“The Workplace and Gender Reassignment, published by a:gender, the independent national cross government network for trans and intersex civil servants, has provided invaluable guidance to departments since 2011. This guidance is now outdated and has been withdrawn.

In its place, Civil Service HR Employee Policy, working closely with a:gender and others, have now published a Gender Identity and Intersex Model Policy Package, to provide information, guidance and support to government departments in relation to sex and gender issues for civil servants and their managers, including issues connected with gender reassignment. This package is available through departmental HR departments”.

59. The Gender Identity and Intersex Model Policy Package can be found at [SC1/15]. It is still in force. Like the Workplace Guide before it, it contains a significant number of statements that indicate support for gender ideology. By way of example:

a. The Policy Package allows men to use women’s facilities and vice versa:

i. “All individuals have the right to express their identity at work and present in their gender. This could mean... using any appropriate single sex toilets and other facilities.” (58)

ii. “It is assumed that the individual knows which facilities are the best match for their gender identity and expression. A trans man ... should not be asked to use gender neutral facilities.” (61)

b. The Policy Package stipulates that disagreement with manifestations of gender ideology in the Civil Service workplace are to be regarded as bullying, harassment or inappropriate conduct for which disciplinary procedures can be instigated. Examples include:

- i. “People may experience bullying, harassment or discrimination regardless of how they identify. Transphobia is the specific fear or dislike of someone because they are transgender. This includes refusing to accept an individual’s gender identity.” (83)
- ii. “Misgendering is using a word, such as a pronoun or form of address, which does not correctly reflect an individual’s gender identity” (86)
- iii. “deliberate, continued and/or repeated incidents [of “deadnaming” or “misgendering”] are unacceptable and should be dealt with using the bullying, harassment and discrimination policy” (88)
- iv. “The gender identities of individuals must be respected at all times. It remains unacceptable to use former names and/or incorrect pronouns while the individual concerned is not present.” (92)

60. The work of a:gender within the Civil Service has not been limited to the creation of the Workplace Guide and the Gender Identity and Intersex Model Policy Package. Amongst other things, a:gender is also actively involved in seeking to influence Civil Service recruitment. In its *“Guidance on inclusive recruitment, development, and retention of trans, nonbinary and intersex people”* [SC1/17], it offers the following advice:

“Interviewers should receive high quality inclusion training to help them to address any biases or knowledge gaps they may have and reduce any impacts of these on interviewees.

...Consider encouraging the sharing of pronouns when everyone involved introduces themselves, whether face-to-face or a video call, to foster a welcoming environment. Visual indicators of allyship including email signatures, lanyards or meeting backgrounds can also show genuine commitments to

hiring people based on talent, regardless of their background. These techniques should be used for all applicants/interviewees, regardless of whether you perceive them to be trans or not...”

61. In short, it seems clear to me that for more than a decade a:gender has been campaigning to embed gender ideology into Civil Service workplaces, with a particular focus on important human resources policies and processes. From the publicly available material that I have seen, it is hostile to the expression of gender-critical views in the Civil Service workplace. As I explain below, this is directly relevant to the taxpayer-funded, centrally-organised mass participation of civil servants in Pride marches every year across the UK.

Civil Service participation in Pride marches

Organisation by the Network

62. Earlier in 2025, the chair of the Network exhorted members to march in Pride parades across the UK, in the following terms [SC1/8, page 3]¹⁹:

“Marching with Pride

This year, Civil Service LGBT+ Network are proudly marching in Pride parades across the UK, from Blackpool to Portsmouth, York to Edinburgh, and Portsmouth to Sunderland. These events are more than colourful celebrations; they are public affirmations of our values and our visibility. We’ll also be marching in Belfast, Glasgow, Manchester, Cardiff and London. There is still time to sign up to march with your Civil Service LGBT+ Network this Pride season. You can register your interest via the events section of our website.

Being present at Pride parades is a powerful act. It signals to our colleagues, our communities, and ourselves that we belong, that we are seen, supported,

¹⁹ <https://www.civilservice.lgbt/news/2025/06/06/chairs-eye-view-june/>

and celebrated. It also reflects the Civil Service's ongoing commitment to creating a workplace where everyone can thrive, regardless of sexual orientation, gender identity, or expression."

63. It is evident from the Network website pages concerning Pride 2025 that the attendance of civil servants at Pride events each summer is well organised and well attended. The Government's pre-action protocol letter in this case referred to them marching "under the banner of the civil service", which is a description that I agree with. The attendance at the Pride events in London and Manchester was expected to be so popular that aspiring Civil Service delegates would be selected from a ballot. As early as 10 February 2025 civil servants were able to register to join Pride parades in 24 cities across the UK [SC1/18].²⁰

64. The reference to civil servants marching "under the banner of the civil service" was no exaggeration: the Network Pride coordinator explained to members in January 2025 that they would ensure that they "*have the correct stock of Civil Service LGBT+ t-shirts*". Furthermore:

"To ensure that we are as sustainable and economic as possible we will be using the same colour and design of t-shirts and banners as last year." [SC1/19]²¹

65. Each Pride event had its own Network signup page and set of detailed instructions. By way of example, the Network page for the Middlesbrough Pride March which took place on 27 September 2025 [SC1/20]²² provided the following instructions:

"For the Saturday pride, meet up with Martin inside the Town Hall Courtyard, the official muster point for the parade from 11.30 hours until the parade starts at 12.00, he will be wearing his pink T shirt and/or carrying a flag. Anyone

²⁰ <https://www.civilservice.lgbt/news/2025/02/10/pride-2025-registrations-are-opening/>

²¹ <https://www.civilservice.lgbt/news/2025/01/16/pride-2025-update/>

²² <https://www.civilservice.lgbt/event/2025-01-22-civil-service-lgbt-network-at-middlesbrough-pride-2025-save-the-date/>

arriving after 12.00 hours please find Martin in the courtyard or just join in the parade.

T-shirts will be provided as per the registration form which the organiser will bring with him. Wear comfy clothes including shoes, as it can be long day.

If you wish to get into the spirit by wearing something LGBT+ appropriate for the parade please do, but bring something to cover up afterwards especially when outside the confines of the Town Hall. This is not purely an LGBT+ event and your safety cannot be guaranteed.

Please remember that we are representing the civil service so please respect the CS code of conduct. – Whilst you may wish to attend wearing your CS T-shirt, please bring a change of top for post parade.

...

The Civil Service LGBT+ Network are planning to attend Pride celebrations at this location. Details for the day will be confirmed here closer to the time.

Registration is open and this is done by one form per event.

..

For any other queries in relation to the Civil Service LGBT+ Network Pride 2025 activities please email the pride co-ordinator - pride2025@civilservice.lgbt.

It is important to remember that at Pride events we are [sic] representing the Civil Service and must act in accordance with our rules and code."

66. Apart from noting my personal interest in Middlesbrough as the town where I was born and grew up, I wish to stress a number of salient points which arise from this quote.
67. The first is the repeated emphasis on the status of civil servants attending each Pride march: they are doing so "*representing the Civil Service*". Attendees were

therefore reminded (twice) that they must respect/act in accordance with the Civil Service Code.

68. Second, eye-catching bright pink Civil Service Pride T-shirts were supplied so that the Civil Service participants in the Pride march would appear in what was essentially a uniform. As can be seen from the photographs at [SC1/21], the Pride T-shirts worn by Civil Servants at Pride marches made prominent reference to a:gender. This makes it clear to any onlooker that these participants were Civil Servants and were officially representing the Civil Service, and associating themselves with a:gender, in their participation in the Pride march.
69. Furthermore, though the Network event instructions cited above do not explicitly refer to this, the event photographs referred to below and the Network Pride page summarised above both make it clear that there were also official Civil Service Pride banners prepared and issued to participants.

Middlesbrough Pride

70. At exhibit [SC1/22] are photographs of the most recent Pride march at which there was official Civil Service participation: the Middlesbrough Pride march on 27 September 2025.
71. It can be seen that at that March there were civil servants wearing the Network-supplied Civil Service Pride pink T-shirts, and carrying Civil Service Pride banners in the same eye-catching colour and design. The photographs also show Civil Service participants carrying trans and progress flags, though it is not clear whether these were supplied by the Network.

Civil Service participation in other Pride Marches in the summer of 2025

72. At exhibit [SC1/23] are photographs of other Pride marches during the summer of 2025 at which there was official Civil Service participation. Again, Civil Service marchers are dressed in official T-shirts, and some are carrying Civil Service Pride banners and flags, including Pride flags, Progress flags and trans flags.

73. The website of Pride in London, which organises the annual Pride March in London each summer, describes its purpose and objectives in the terms set out below. I have emphasised those statements which appear to me to demonstrate objectives of a political nature [SC1/24]²³:

*“Pride in London is a vibrant and dynamic organisation that relies on the passion and commitment of both staff and volunteers who share a common goal of advancing equality and diversity. As a non-profit organisation, any surplus funds we generate are reinvested back into the LGBTQ+ community, to support initiatives and **campaigns that aim to promote greater inclusivity and acceptance.***

*We are proud to run the UK's largest and most diverse Pride event, which provides a vital platform for all members of London's LGBTQ+ communities, including those who identify as lesbian, gay, bisexual, trans, queer, questioning, intersex, non-binary, asexual, polysexual, genderqueer, and gender variant. Our aim is to raise awareness of LGBTQ+ issues and **advocate for the freedoms that will enable everyone to live their lives on equal footing.***

*Through events such as Pride's Got Talent, the annual Parade, or our amazing new Human Rights Forum, we provide a platform for LGBTQ+ people to express themselves creatively and celebrate their identity. Our events are designed to showcase the amazing diversity of our community and enable LGBTQ+ people to be visible and vocal about the progress we have made, the work still to be done, and **the importance of continued advocacy.***

Our mission

*Pride in London is our city's volunteer-powered LGBTQ+ force that unites our voice, amplifies our diversity and **protests against inequality.***

...

EQUALITY

Fight for the rights of LGBTQ+ individuals to be equal to the majority in every way”

²³ <https://prideinlondon.org/about-us>

74. London Pride is also the source of the ‘Pride Pledge’ [SC1/25]²⁴ This is described as a set of requirements that Pride in London has *“for all organisations wishing to take part in any and all Pride in London events”*, which includes the Civil Service. It then lists as expectations for all participating organisations a number of pledges, including pledges associated with gender ideology, such as *“To provide evidence of their work in championing diversity equality and inclusion with regards to the following: ... gender identity.”* The pledges also require *“To be inclusive regardless of ... gender identity”*. It concludes *“Should an organisation fail to meet any of these requirements, Pride in London reserves the right to reject their application to participate in all and any Pride in London events until the pledges are met”*.
75. As Kathleen Stock also notes in her witness statement in this case, Northern Pride (the organisation that runs Newcastle’s Pride in the City events) also seeks *“the elimination of discrimination on the grounds of sexual orientation, gender identity and expression, and sex characteristics”* (emphasis added): see the most recent published accounts [SC1/26]²⁵.
76. Northern Pride also engages in overtly political campaigning. For example, in April this year it published a series of social media posts criticising the ‘highly damaging’ Supreme Court ruling in the *For Women Scotland* case, and it organised a protest march that month [SC1/27]:

“Yesterday the city filled with Trans folk and their allies with a clear message, that Trans Rights are Human Rights, and we as a city, and as a community will not stand by when trans rights are being eroded, rolled back and challenged on a daily basis.

²⁴ <https://prideinlondon.org/pride-pledge/>

²⁵ <https://find-and-update.company-information.service.gov.uk/company/06800285/filing-history>

... Northern Pride will continue to amplify trans voices and lived experiences through our work, our events, and in particular, we will continue to educate and advocate through our training program Proud Allies.

Huge thank you to all those involved in the protest yesterday.”

77. The Northern Pride website also states a key principle as *“To protect LGBTQIA+ rights already won and champion these whilst supporting the fight to end equality indifferences (sic) that remain at home and abroad”* [SC1/28]. A T-shirt sold through the online shop for the organisation behind Newcastle Pride carries the slogan: *“Remember Resist Rise Up”* [SC1/29].
78. According to The Guardian (13 May 2025) [SC1/30]²⁶, the organisers of the Pride events in Birmingham, Brighton, London and Manchester suspended political party participation in their events in “unequivocal solidarity” with the transgender community. This move followed the Supreme Court ruling in *For Women Scotland* in April. According to a joint statement, the organisers of the events said the move was a *“direct call for accountability and a refusal to platform those who have not protected our rights”*. According to the Guardian, the Pride organisers said *“We are united not only in message, but in purpose. At a time when trans rights in the UK are under growing attack, our resolve has never been stronger: we will not allow progress to be undone”*.
79. In summary, the Network undertakes detailed organisation of official Civil Service representation at dozens of Pride marches and events across the country each year. Civil servants are issued with identical pink T-shirts stating ‘Civil Service’, ‘Pride’ and ‘a:gender’. Civil servants are also given banners in the same colours. Progress, Trans and Pride flags are also extensively used by marching civil servants, wearing these T-shirts and carrying these banners. I have also seen evidence that Civil Service employees who were participants in Middlesbrough Pride posted about it afterwards on LGBT+ Staff network pages²⁷.

²⁶ <https://www.theguardian.com/society/2025/may/13/political-parties-banned-pride-events-uk-gender-ruling>

²⁷ <https://www.civilservice.lgbt/news/2024/09/05/pride-season-is-almost-over/>

The consequences of Civil Service participation in Pride marches

80. Since the Pride movement, and the a:gender organisation, is manifestly political in intent and image, as is the use of Pride and Progress Flags, allowing civil servants to campaign for Pride in this way, under the banner of the Civil Service, creates the impression the Civil Service is institutionally ideologically aligned with, or should be aligned with, this cause. It signals to me, and I believe would signal to many people, including gender critical people, a political association with the political and contested gender ideology viewpoint.
81. It sends a powerful message to trans activists and others who support gender ideology that the Civil Service are 'on your side'. To people like me who do not agree with gender ideology, the message is equally clear: civil servants are, officially, not sympathetic to your stance, you are unlikely to succeed with any advocacy that does not match this ideology, and you would do well to moderate your behaviour and speech accordingly.
82. Gender ideology affects the lives of many in this country, as well as the formulation of public policy and the development of the laws that govern the way we live. For the Civil Service actively to associate itself in this way to a cause espousing one side of a heavily contested public debate is a serious matter for The Christian Institute and for someone like me. Engaging in that debate is important to me, and to The Christian Institute.
83. It dents my confidence entering a meeting or engaging with civil servants when their actions, and the actions of the Civil Service more widely (such as hanging Pride flags in Civil Service buildings), indicate their adherence to Pride and gender ideology. I naturally doubt that the Institute and its viewpoints are going to get a fair hearing. It suggests to me that the outcome of our discussions might be pre-judged as a result of their adherence to the ideology that the rainbow/Pride flag represents. I also do not think it is appropriate for civil servants to wear campaigning material in a meeting concerning the views of the stakeholders to whom they are talking. Inevitably, I do not then consider them to

be impartial, and lack confidence that they will be impartial in the advice and information they provide to the minister.

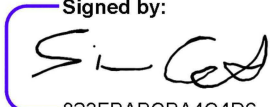
84. Indeed, this conclusion does change how I then engage with those civil servants because I have to assume from the outset they have a negative view of my beliefs as a Christian with gender critical views. I have often described it to people as like having to start a race ten paces behind the start line in terms of the civil servants' perception of the Christian community I represent. I feel I have to explain away myths about my views which often accompany gender ideology. For example, I have often had to explain to officials that Christians don't hate gay or trans people, because their apparent adherence to gender ideology would indicate that they may well think that we do.
85. Civil servants are the gatekeepers for ministers and other governmental decision-makers, and meet or correspond with stakeholders to ensure that their opinions are faithfully mediated and represented. Their job is to ensure that all relevant viewpoints are taken into account in policy making and the legislative process. If they are actively campaigning for a cause, then I reasonably think that cause is the lens through which they interpret what I am saying, and the filter they will apply to my engagement. It can too easily affect how I communicate the interests of the Institute and those it represents, even causing me to censor what I say and how I say it. (Indeed, I have to assume it may also be the reason why I often cannot get meetings with ministers in the first place, even on areas where we are clearly stakeholders with relevant expertise.) As a result, this affects what concerns and advice will be communicated to ministers. But it is essential that ministers are fed all relevant information without fear or favour, and that they receive impartial advice. The duty of impartiality on civil servants exists as a means to ensure that ministers govern in the public interest.
86. An impartial Civil Service is also crucial to the democratic process. The electorate needs confidence that change can be delivered through the ballot box. But if the public and stakeholders consider that the Civil Service is favouring particular interests, leading to the expectation that advice given to ministers will be coloured by that, there is a loss of confidence that any change in Government

can effect a real difference in policy making. That is unhealthy in a democracy. The public and stakeholders must have confidence that civil servants are not advancing any contested ideology.

87. This is not merely theoretical. A breach by civil servants of their duty of impartiality can impact on the development and delivery of government policy, and on legislation proposed to Parliament. For example, there has been public disquiet about the way in which classroom education has reflected controversial gender ideology, particularly in Relationships and Sex Education. Controversial resources have been used to promote gender ideology and the worldview associated with it. In response to this, the previous government proposed a review of RSHE statutory guidance in March 2023. Eventually, new statutory guidance was published on 15 July 2025, which will come into force on 1 September 2026. The new guidance states that schools “should not teach as fact that all people have a gender identity”. In addition, December 2023 finally saw the publication for consultation of the long-awaited new guidance *Gender Questioning Children: Non-statutory guidance for schools and colleges in England*. It warned schools against “implying contested views around gender identity are fact” (see *Gender Questioning Children: Non-statutory guidance for schools and colleges in England*). To date, the final guidance has not been made, despite the consultation ending in March 2024.

Statement of Truth

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signed:  Signed by:
823FBABCBA4C4D6...

Name: Simon Calvert

Date: 12/17/2025