



Michael O'Flaherty
% Council of Europe
Office of the Commissioner for Human Rights
67075 Strasbourg Cedex
France

10th November 2025

Dear Michael O'Flaherty,

Trans-Led and Human Rights Groups report the UK's Equality and Human Rights Commission to GANHRI

Thank you so much for your [recent letter](#) to the UK's Women and Equalities Committee (WEC) and Joint Committee on Human Rights (JCHR) regarding the implementation of the UK Supreme Court ruling in *For Women Scotland Ltd v The Scottish Ministers*.

We absolutely share your concerns about possible infringements of UK trans people's human rights and the risks of widespread exclusion of trans people from many public spaces.

We wish to draw your attention to the central role the UK's Equality and Human Rights Commission (EHRC) has played before, during and after this Supreme Court judgement. The EHRC [has been instrumental](#) in determining both the outcome of the Supreme Court ruling and the ways in which the ruling is now being implemented.

The EHRC's [interim update](#) and the [draft Code of Practice](#) have resulted in policies of blanket trans exclusion and segregation being implemented by services and businesses up and down the UK, with [devastating impact on trans and non-trans people alike](#). This is despite the fact that the EHRC's interim update is [subject to ongoing legal challenge](#) and has now been deleted, and the draft Code is still awaiting Ministerial approval.

We believe that the EHRC's influence and insistence on these exclusionary practices and policies put them in direct violation of their fundamental mandate to promote and protect human rights. In fact, we believe that the EHRC are currently pursuing a position that directly undermines and reduces the rights of transgender people in the UK, and even risks their outright violation.

Due to these – and significant other – concerns, along with Amnesty International UK and Trans+ Solidarity Alliance we have made a joint submission to GANHRI's Sub-Committee on Accreditation, requesting an urgent review of the EHRC's compliance with the Paris Principles and accreditation status.

We attach a copy of that submission here. Please also see the additional submissions made by [Scottish Trans](#) and the [Trans Advocacy and Complaints Collective \(TACC\)](#).

We hope that the above information will be of use to you as you continue to advocate for the human rights of UK trans people, and all UK residents, and please do not hesitate to contact us if we can be of additional help or provide further information.

Yours sincerely

TransActual

PS We plan to share a copy of this letter publicly on our website, to build further awareness of the issues highlighted here.