



Good Law Project
167-169 Great Portland Street
5th Floor
London
W1W 5PF
W: goodlawproject.org

Charity Commission for England and Wales
PO Box 211
Bootle
L20 7YX

Submitted through the Charity Commission's online complaints form

29 October 2025

**Complaint about misconduct and/or mismanagement by the Trustees of
Policy Exchange Limited (registered charity number 1096300)**

Dear Charity Commission,

1. We write to raise concerns about apparent breaches of duty and/or mismanagement by the Trustees of Policy Exchange Limited ("**the Charity**").
2. The Charity was founded (and registered with the Charity Commission) on the explicit basis that it would be a 'non-partisan' institution—and that it would educate the public, in an objective way, in relation to politics and economics.
3. In fact, the Charity's true activities involve lobbying, influencing government policy, and publishing one-sided, partisan reports filled with 'policy recommendations'. We have seen no evidence that the Charity genuinely engages in the task of educating members of the public in a balanced way. All its activities seem to be directed towards policy-makers, politicians and journalists.
4. In recent years, as detailed below, the Trustees have shown an unhealthy obsession with transgender issues, and with advocating in favour of the rolling-back of transgender rights—a cause which falls wholly outside the Charity's educational objects.
5. As a result, the Trustees are operating the Charity in a way which is flatly contrary to the law. This has led to the unlawful expenditure of hundreds of thousands of pounds

of charitable funds on non-charitable activities. Unless addressed, it threatens significant harm to the reputation of the charitable sector for impartiality.

6. We therefore invite the Commission to take regulatory action. The evidence amply justifies the opening of a formal statutory inquiry under s.46 of the Charities Act 2011.

The obligations of the Charity

7. The Charity is established as an educational charity. Its stated objects are:

“3.1. The non-partisan advancement of education of the public in the economic social and political sciences and their effect on public policy and the policy-making process in the UK and the promotion and publication of objective research;

3.2 the pursuit of such other purposes which are exclusively charitable within the laws of England and Wales as the directors of the Charity (hereinafter referred to as “the Trustees”) shall determine...”

8. Any activity which is partisan—and any research which is not objective—is *ultra vires*, beyond the powers of the Trustees, and a breach of their duties.
9. The requirement for non-partisanship is explicit and strict. In this regard, the Charity's constitution is *more demanding* than the general law. Even under the general law, however, an educational charity must act in a balanced and non-politicised way. For example:
 - 9.1. In *Bonar Law Memorial Trust v Inland Revenue Commissioners* (1933) 17 T.C. 508, a body was established for education in “*economics, in political and social science, in political history*”. However, the governors were exclusively members of the Conservative Party and the programme of education was a right-wing ideological one (see e.g. 518). Finlay J held that the body was not advancing charitable purposes.
 - 9.2. In *Re Hopkinson* [1949] 1 All E.R. 346 a testator left money for education in the principles of the Labour Party. It was held that this was “[p]olitical propaganda masquerading... as education” and therefore not a charitable activity.
 - 9.3. In *Re Bushnell (decd)* [1975] 1 All ER 721 a testator left money to educate the public in the principles of socialised medicine. Goulding J held that this was not non-partisan education, but “*propaganda*”.

10. These principles are summarised in the Commission's guidance *The Advancement of Education for the Public Benefit* (2008, amended 2011).¹ This makes clear that any values adopted by an educational charity must be "*uncontroversial... generally supported by objective and informed people*" (Section C5, p.9) and that any information must be researched and presented "*in a balanced way that encourages awareness of different points of view*" (Section C5, p.9). The guidance also confirms the Commission's position that persuading people "*to support a controversial, propagandist or political viewpoint*" does not meet the public benefit test in charity law (Section D5, p.5).

Our complaints

11. Despite its stated objects, the Charity operates a right-wing think-tank. It does not hide the fact that it admires, celebrates and seeks to advance right-wing politics. For instance, it is currently hosting a year-long festival celebrating the 100th birthday of Margaret Thatcher, including events at which panellists have praised her "*determination and character, her clarity of thinking and policy – as well as her interest in ideas – and her kindness and generosity*"; as well as her "*clarity of... philosophy and vision... her courage... Her strength of conviction... her gift for turning conviction into action and her likely dismissal of prevailing contemporary orthodoxies like net zero and identity politics... her indomitable persona... [and] her tactical aptitude for judging when boldness or caution was necessary.*"² A video of one of these events shows the Charity's director Lord Godson praising Margaret Thatcher (to cheers from the audience) and stating that she "*got it overwhelmingly right*".³
12. For the purposes of this complaint we do not focus on every single activity of the Charity. We recognise that the Commission must work in a proportionate and focused way. Accordingly, we have identified a number of specific instances where there can be no sensible dispute that the Charity has acted outside its objects and contrary to charity law.
13. Many (but not all) of the examples that we have identified relate to the Trustees' publications on transgender-related topics. This is because Good Law Project is a leading defender of transgender rights; and we consider it important that education in this area should be balanced, informative and unbiased. On any view, the Charity's involvement in this area is partisan and unbalanced, and indeed not educational but

¹<https://assets.publishing.service.gov.uk/media/65254203244f8e000d8e7323/the-advancement-of-education-for-the-public-benefit1.pdf>

² <https://policyexchange.org.uk/events/the-thatcher-centenary-project/>

³ https://www.youtube.com/watch?v=vgNp_1AX-yl

rather a campaign of advocating for the adoption of 'gender-critical' (i.e. anti-transgender) measures. Although these complaints focus on transgender issues, we have also included materials showing that the Charity has shown inappropriate political bias and partisanship more broadly.

a) *Non-Compliant Publications*

14. We enclose, at Appendix 1, a list of 18 formal publications by the Charity since 2021 which have caused us particular concern ("**the Non-Compliant Publications**") with short comments on each of them. There can be no doubt that each of these publications is:
 - 14.1. partisan;
 - 14.2. not educational; and/or
 - 14.3. not objective.
15. Where the materials include original research, this is not conducted objectively, as it is invariably geared towards providing evidential support for a list of 'policy recommendations'. These policies are not proposed as a means to advance public education, but as an end in themselves. Educational charities should be addressing their reports to the wider public, not to government or politicians, and should not be telling politicians what to do.
16. The list of Non-Compliant Publications is not exhaustive. We expect that further investigation by the Commission will reveal that other publications by the Charity are similarly impermissible under charity law and the Charity's constitution.
17. We do not know the exact sum spent by the Trustees on commissioning, researching, publishing and publicising the Non-Compliant Publications. However, the Charity's overall annual expenditure is c. £3.8 – 3.9 million, out of which c. £1.5 – 2 million is spent on 'research'. The Non-Compliant Publications made up a substantial proportion of that 'research'. We would therefore expect that they have cost the Charity, at least, several hundreds of thousands of pounds to produce and disseminate. This is a large-scale misapplication of charitable funds which demands regulatory intervention.
18. We also take issue with the accuracy of the Non-Compliant Publications and consider they are not prepared or presented in line with professional standards of objective

research. We would be happy to provide more detail to the Commission on this if it would assist.

b) *Non-Compliant Public Comments*

19. We enclose, at Appendix 2, a list of 36 instances on which senior figures have made public statements on behalf of the Charity which have caused us concern ("**the Non-Compliant Public Comments**").
20. We see no basis on which it can sensibly be said that, by making these statements, the Charity's representatives have advanced public education for the public benefit. In short, the Charity appears to regularly offer its staff to act as 'talking heads' in favour of right-wing positions on television and in tabloid newspapers. That does not advance the Charity's objects of non-partisan, objective education of the public. On the contrary, it diminishes the Charity's public reputation for impartiality.
21. It is, of course, the responsibility of the Trustees to ensure they have sufficient supervision and oversight of representatives who are making public statements on the Charity's behalf. The Commission may wish to investigate the extent to which the Non-Compliant Public Statements were known to and/or authorised by the Trustees or, conversely, whether the Trustees took steps to discipline those who made them once they learned about them. As far as we can tell, the Charity has not distanced itself from any of the comments in Appendix 2.

c) *Political activity generally*

22. We invite the Commission to conclude that the Trustees of the Charity are:
 - 22.1. positioning the Charity as a 'pro-market' and 'right-wing' think-tank, which is inconsistent with its stated object of non-partisanship;
 - 22.2. committing charitable resources towards the formulation of, and advocacy for, 'policy recommendations' (which is not a charitable or educational purpose); and
 - 22.3. showing an unbalanced and disproportionate interest in transgender issues, on which the Charity uniformly takes a 'gender critical' stance and never fairly explains alternative views, policies or evidence.

23. These points are notable from the way in which the Charity measures its impact. According to the Trustees' Annual Report for 2023-24⁴ (at p.1), the Charity's main activities include "[t]wo way dialogue with policy makers and opinion formers... Impact is measured by the extent to which the Charity's work is able to influence policy change, to the benefit of the wider public... Policy Exchange continued to make a significant impact across a wide range of policy sectors in 2023-2024..." The report boasts at length that the Charity has *successfully* influenced Government policy, including (at pp.4-5) in bringing about new laws "to deal with disruptive protests" with assistance of the Charity's reports in relation to the 'Just Stop Oil' protests; in persuading the Government to partially cancel the HS2 rail route; in persuading public bodies to adopt various anti-transgender policies, including the blocking of the Scottish Parliament's Gender Recognition Reform Bill; revised gender guidance for schools; and the banning of puberty blockers (each of which "*implemented*" the Charity's policy recommendations); and in dissuading policymakers from adopting the target of achieving net zero by 2030.
24. These may be political 'victories', but they are not legitimate measures of "*impact*" for a non-partisan educational charity. Charitable funding (and publicly-funded charitable tax reliefs) should never be deployed in order to shift the course of British politics in this way.⁵ By devoting almost all the Charity's resources to influencing legislation and Government policy, for no apparent educational purpose, the Trustees are acting in breach of their duties and misapplying charitable funds.
25. Such activity is also damaging to the trust and confidence that the public places in charities. We cannot think of a more extreme example of a registered charity that is pursuing a programme of political activity as an end in itself.

Conclusion

26. The Commission would be justified in opening a statutory inquiry in respect of the Charity. This would allow it to investigate the areas of concern that we have identified, and to take appropriate steps to ensure compliance with charity law—including but not limited to requiring the Trustees to pay compensation reimbursing the Charity for all funds that they have unlawfully authorised to be spent on political, non-charitable and non-educational activity.

⁴<https://register-of-charities.charitycommission.gov.uk/en/charity-search/-/charity-details/3993017/accounts-and-annual-returns>.

⁵ As summarised in the Commission's guidance *Political activity and campaigning by charities* (2022): <https://www.gov.uk/guidance/political-activity-and-campaigning-by-charities>.

27. We would be happy to discuss any of these matters with the Commission. As a matter of courtesy we are sending a copy of this letter to the Charity's Trustees.

Yours faithfully

Good Law Project

Good Law Project

Encs. Annex 1 - Non-Compliant Publications

Annex 2 - Non-Compliant Public Comments

Appendix 1

Non-Compliant Publications

1. Academic freedom in the UK (3 August 2020)⁶

- This report argues that there is an effect of structural discrimination against people with right-wing views in academia.
- It proposes greater oversight of universities to ensure that academics can appeal outside of universities if their claims of discrimination are not adequately addressed within the university, and also to enforce non-discrimination against people of differing political positions, and promote diversity of viewpoints.
- The report calls for Parliament to create a 'Director for Academic Freedom' appointed by the Secretary of State for Education, and for the Office for Students to fine universities that fail to uphold academic freedom and free speech.
- It also argues for watering down equalities laws to allow for more legally tolerated discriminatory speech.
- The report contains a list of 'policy recommendations' at pp13-15.
- There are no references to alternative viewpoints, for example concerning the censorship of pro-trans views in academia, or discrimination against trans people – or any other marginalised group – having the effect of curtailing career advancement in academia, academic freedom or free speech.

2. Prejudging the Gender Controversy (7 July 2021)⁷

- This document aims to persuade the Judicial College to rewrite the Equal Treatment Bench Book, claiming that the existing draft describes *"what transgenderism is and the problems trans people face in society... in a partisan and didactic fashion"*.
- It is an extended opinion piece / piece of advocacy seeking to influence the judiciary, which does not educate the public.

3. The future of the Equality Act 2010 (13 September 2021)⁸

⁶ <https://policyexchange.org.uk/publication/academic-freedom-in-the-uk-2/>

⁷ <https://policyexchange.org.uk/publication/prejudging-the-transgender-controversy/>

⁸ <https://policyexchange.org.uk/publication/the-future-of-equality/>

- The admitted sole purpose of this document is to argue in favour of changes to the Equality Act 2010, which it is said has *"been applied in unexpected and over-reaching ways that seem to be at odds with sound policy and, in some cases, Parliament's intent in enacting the Act."*
- See pp8-9 with four bullet point recommendations and pp28-29, 33-34, and 37-38, all of which contain draft statutory language for which the Charity is advocating.
- The document is not educational, but is a piece of political advocacy and/or a document to support lobbying.

4. Transgenderism and policy capture in the criminal justice system (30 May 2022)⁹

- This report describes the current approach of the criminal justice system as prioritising *"the wishes and feelings of those who identify as transgender over the rights of others, and particularly over the sex-based rights of women, such as rights to single-sex facilities"*, examines *"the detrimental effects of this approach"*, and makes recommendations for reform *"based on acknowledgment of the significance of biological sex"*.
- This document is a piece of advocacy; it is not educational. It is especially unbalanced / partisan even by the Charity's standards.
- It is not disputed that these views have their place in democratic debate. But they clearly fall outside the remit of an expressly non-partisan educational charity.

5. The Politics of the Culture Wars in Contemporary Britain (10 November 2022)¹⁰

- This document assesses British public attitudes to 'culture war' issues, based on a survey that included several questions about trans-related subjects. The survey is used to call upon Labour (which, at the time, was in opposition) to avoid *"culturally socialist positions"* and *"unpopular cultural leftist policies"*.
- The survey methodology lacks academic rigour and its analysis is unreliable, since 'don't know' responses have been omitted. Many of the questions are unbalanced and/or leading ones, e.g. *"Should schools teach that there is no biological sex, only gender?"* which does not fairly represent the approach taken by

⁹

<https://policyexchange.org.uk/publication/transgenderism-and-policy-capture-in-the-criminal-justice-system/>

¹⁰ <https://policyexchange.org.uk/publication/the-politics-of-the-culture-wars-in-contemporary-britain/>

transgender-inclusive education. The author draws a number of confusing or incorrect inferences from the responses.

- It is unclear how this survey advances balanced, non-partisan public education.

6. **The Political Culture of Young Britain (19 November 2022)**¹¹

- This report argues for the political position that young people should receive greater exposure to right-wing ideas in the education system.
- It repeatedly refers to 'radical left ideas' and 'critical race theory', which is not neutral language but characteristic of a right-wing position.
- The report contains twenty-three 'policy recommendations' which are politically partisan and right-wing at pp 46-48. The publication of these 'recommendations' does not advance the education of the public.
- Page 49 suggests that "*a left-modernist youth culture*" is responsible for the rising incidence of mental health problems among young people. That claim is unsupported by any evidence, politically partisan, and offensive to young people facing mental illness.

7. **Gender Identity Ideology in the NHS (2 January 2023)**¹²

- This report argues in favour of the adoption by the NHS of 'gender critical' measures, and against transgender-inclusive and pro-equality policies.
- At page 7, the Charity claims that transgender-inclusive policies in the NHS are "*a dressed-up form of 21st century misogyny*"; that the NHS is "*seriously compromised by an ideology that is diminishing the rights of women and girls*"; and that this has given rise to "*nothing short of a national scandal*". This is partisan and ideological.
- The title of the report is itself partisan and unbalanced. 'Gender ideology' is a term used by right-wing and/or 'gender-critical' groups to mischaracterise the position of their opponents. It is not used by most transgender people or their allies.¹³ A proper

¹¹ <https://policyexchange.org.uk/publication/the-political-culture-of-young-britain/>

¹² <https://policyexchange.org.uk/publication/gender-identity-ideology-in-the-nhs/>

¹³ See e.g. Z. Murib, "*Gender Ideology, the Far Right, and LGBTQ Politics*" (2025) *Political Science & Politics* 58(3), 466-471; S. Lamble, "*Confronting complex alliances: Situating Britain's gender critical politics within the wider transnational anti-gender movement*" (2024) *Journal of Lesbian Studies* 28(3), 504-517. The term 'gender ideology extremism' has now been adopted by President Donald J. Trump in support of his anti-transgender platform: https://en.wikipedia.org/wiki/Executive_Order_14168. See, generally, https://en.wikipedia.org/wiki/Anti-gender_movement.

educational charity would not use such a title, and would use neutral and less inflammatory language.

- The report is clearly a piece of advocacy with little or no educational content.

8. The Scottish Gender Recognition Reform Bill: The Case for a Section 35 Order (12 January 2023)¹⁴

- This report argues in favour of the UK government making a 'section 35 order' to block Royal Assent for the Scottish Gender Recognition Reform Bill. It does not present competing arguments in a fair or balanced way (or at all).
- Five days after the paper was published, the UK government in fact made a section 35 order on the grounds proposed.¹⁵ The Charity was, therefore, successful in lobbying the UK government.
- The paper was clearly a piece of advocacy, with little or no educational content.
- For a better example of how a charity can lawfully educate the public on these difficult issues, see e.g. Institute for Government, 'The use of Section 35 of the Scotland Act to block the Gender Recognition Reform (Scotland) Bill' (9 October 2023).¹⁶ The Institute for Government is a registered educational charity (1123926) which, unlike the Charity, approaches its work in a non-partisan way.

9. Blurred Lines: Police Staff Networks – politics or policing? (28 January 2023)¹⁷

- This report argues in favour of the abolition or regulation of staff diversity networks within the police. It argues that this has led to the "*blurring*" of the police's mission and a "*crisis*" in policing, and makes numerous policy recommendations.
- The report fails to advance public education about the issues in a non-partisan way.

10. Asleep at the Wheel: An Examination of Gender and Safeguarding in Schools (30 March 2023)¹⁸

¹⁴ <https://policyexchange.org.uk/publication/the-scottish-gender-recognition-reform-bill/>

¹⁵ <https://www.gov.uk/government/publications/statement-of-reasons-related-to-the-use-of-section-35-of-the-scotland-act-1998>

¹⁶ <https://www.instituteforgovernment.org.uk/explainer/section-35-scotland-gender-recognition-bill>

¹⁷ <https://policyexchange.org.uk/publication/blurred-lines-police-staff-networks-politics-or-policing/>

¹⁸ <https://policyexchange.org.uk/publication/asleep-at-the-wheel/>

- This report argues that *"schools are increasingly becoming influenced by gender ideology, to the extent that fundamental safeguarding principles are being compromised"*.
- Like the other materials, it exclusively advocates for a 'gender critical' approach and seeks to create a moral panic around *"radical and unscientific beliefs... embedded in the education system"* (page 9).
- The report makes nine 'policy recommendations' (page 15) which are all 'gender-critical' and/or right-wing. There is no effort to explain potential counter-arguments or drawbacks to such policies, or to present opposing points of view.
- The report concludes with a lengthy criticism of Stonewall, which serves no educational purpose.

11. Biology Matters Compendium, 2nd Edition (4 May 2023)¹⁹

- This document is a dossier of recent developments relating to gender. The language used is heavily 'gender-critical'. For example, it refers uncritically to the idea of 'gender ideology', which as discussed above is a partisan and/or right-wing label; and it says that pro-transgender policies have been introduced *"without public scrutiny and in the absence of democratic consensus"*.
- The Charity now regularly produces these bulletins, and devotes staff time and resources to doing so. The purpose of these bulletins seems to be documenting recent political victories or defeats from the perspective of 'gender critical' campaigners, and galvanising readers to further action.

12. The problem with 'allyship' schemes at NHS hospitals (29 August 2023)²⁰

- This is an odd document, since it does not constitute research but rather an 8-page alarmist attack on a London NHS hospital. It reproduces various banners and leaflets that the hospital has provided to its staff and patients in relation to LGBT+ issues.
- The purpose of the report is, as far as we can tell, to place the hospital under pressure to withdraw its LGBT+-related banners, leaflets and other materials.

¹⁹ <https://mailchi.mp/policyexchange/policyexchange-1990444?e=%5BUNIQID%5D>

²⁰ <https://policyexchange.org.uk/publication/the-problem-with-allyship-schemes-at-nhs-hospitals/>

- The Charity appears to have leaked the report, before publication, to right-wing media. On 28 August 2023, 'The Sun' wrote about the report under the headline: 'Bonkers Guidelines: Fury over woke NHS hospital poster that says asking someone's name is transphobic'.²¹
- The sole outcome of this document was that it contributed to a culture-war about transgender people. That is plainly not a charitable activity.

13. What do we want from the King's Speech? (16 October 2023)²²

- This document is a 67-page political manifesto which the Charity puts forward as *"a blueprint... a plan that puts the British people at the heart of the government's thinking. I am sure some will be vigorously opposed, but let's welcome criticism, after all, now is not the time to be faint hearted..."* (page 7).
- The Charity's proposals are deliberately partisan and not reflective of consensus.
- The whole report is dedicated to proposals for items of primary legislation to be passed by Parliament. The proposed legislation is universally right-of-centre.
- As stated in the introduction: *"In this report we present **a comprehensive legislative programme** for the fourth Parliamentary session, orientated around Policy Exchange's four underlying themes of Prosperity, Place, People and Patriotism. These address the pressing policy issues that must be tackled now – and that can only be addressed **by means of primary legislation**. Collectively, they comprise **an ambitious agenda to strengthen Britain's economy, improve our public services, strengthen public order and safeguard our constitution**"* (page 9; emphases added).
- Charities may put forward policies in specific areas, e.g. housing policies for homelessness charities, environmental ones for conservation charities, and so on. But it is not appropriate that a registered educational charity should be putting forward a *"comprehensive legislative programme"* for a right-wing government.
- It is troubling that the Trustees of the Charity commissioned and approved this document. It is plainly contrary to the basic charity law rules against political activity. It is also not educational.

²¹ <https://www.thesun.co.uk/health/23682614/nhs-sign-asking-name-transphobic/>

²² <https://policyexchange.org.uk/publication/what-do-we-want-from-the-kings-speech/>

14. The Crown Prosecution Service's approach to transgenderism (16 October 2023)²³

- This report argues that the CPS has been *"ideologically captured"* by *"gender identity ideology"*.
- The report makes various 'policy recommendations' which seek to influence the Government and/or CPS in a 'gender critical' direction. None of them involve advancement of public education.
- It does not serve any obvious educational purpose and is unbalanced.

15. Levelling the playing field: Why women and girls matter in amateur sport (29 December 2023)²⁴

- This report argues that transgender women should be excluded from women's events in amateur sport. It presents this in alarmist terms, stating that transgender women are *"a threat to the integrity of sport"* and that their inclusion is *"grossly unfair, demotivating and possibly unsafe"* (page 6). It refers repeatedly to *"gender ideology"* (as to which, see above).
- The report makes various 'policy recommendations' addressed to the International Olympic Committee, Sport England, the Government, the organisers of Parkrun and other amateur sports events, and universities and colleges.
- In essence, these recommendations call for transgender women to be banned from all women's sports, at all levels. It calls on the Government to remove all funding from amateur sports organisers and clubs (such as Parkrun) that fail to do so.
- There is no effort at balance, or to present the issues in a fair-minded and informative way, and contains little or no educational content.

16. Biology Matters Compendium, 3rd Edition (18 February 2024)²⁵

- See #11 above. This is a dossier of recent developments relating to gender, but it is presented in an unbalanced and alarmist way.
- The 'compendium' includes a 'call for evidence' asking readers to submit *"Examples of where women's rights, the rights of LGB people, and children's rights are at risk of*

²³ <https://policyexchange.org.uk/publication/the-crown-prosecution-services-approach-to-transgenderism/>

²⁴ <https://policyexchange.org.uk/publication/levelling-the-playing-field/>

²⁵ https://us2.campaign-archive.com/?e=__test_email__&u=9b84930db1f42eef43c1b869b&id=c01d1ce483

being undermined by the adoption of gender identity ideology” and “Examples of where organisations and public sector services have introduced de facto self-identification and have developed policies based on gender identity ideology.” There is no suggestion that contrary evidence or views will be considered, or even that they can be submitted at all.

- The ‘compendium’ misrepresents the Supreme Court’s judgment in the *For Women Scotland* case. Contrary to what is suggested, this judgment did not rule that trans people without a gender recognition certificate are ineligible to use single-sex spaces relating to their acquired sex.

17. Biology Matters Compendium, 4th Edition (3 July 2024)²⁶

- See #11 above. This is a dossier of recent developments relating to gender, but it is presented in an unbalanced and alarmist way. It includes the same ‘call for evidence’ as #16 above.
- The report contains a narrative of developments which uncritically presents ‘gender-critical’ measures as positive and progressive ones: *“Since the first Project Compendium in 2022, support for women’s sex-based rights and opposition to gender identity ideology has increased... However, politicians and institutions have been slower than the public to shift their perspectives on gender ideology. The last 18 months saw some **progress** made, but **much is still to be done**...”* (emphasis added)

18. Biology Matters Compendium, 5th Edition (7 June 2025)²⁷

- See #11 above. This is a dossier of recent developments relating to gender, but it is presented in an unbalanced and alarmist way. It includes the same ‘call for evidence’ as #16 above.

²⁶ https://us2.campaign-archive.com/?e=test_email_&u=9b84930db1f42eef43c1b869b&id=cf6447501f

²⁷ <https://policyexchange.org.uk/publication/biology-matters-project-compendium-5th-edition-2/>

Appendix 2

Non-Compliant Public Comments

	Date	Type	Outlet	Headline	Description	Link	Author/ contributor
1	30/03/23	TV appearance	TalkTV / YouTube	Gender identity - Children 'put at risk' by gender ideology in schools	• TV appearance arguing that transitioning in schools is a <i>"safeguarding concern"</i>. • Unbalanced and not educational.	https://www.youtube.com/watch?v=ttNrd6DMNck	Lottie Moore (Head of Equality and Identity)
2	29/04/23	Opinion article	The Sun	Parents must be told what schools teach on sex and gender – it's their right	• Tabloid opinion piece fearmongering about <i>"gender ideology"</i> being taught to children. • Unbalanced and not educational.	https://www.thesun.co.uk/news/22205352/lottie-moore-parents-schools-sex-gender/	Lottie Moore
3	17/06/23	Opinion article	The Spectator	When will the Department for Education get a grip on its transgender guidance?	• Argues that teaching children about trans people in RSHE is a safeguarding risk, has <i>"no basis in scientific reality"</i> and <i>"can cause serious harm to vulnerable people"</i>. • This article serves no educational function, and no balance is offered.	https://www.spectator.co.uk/article/when-will-the-department-for-education-get-a-grip-on-its-transgender-guidance/	Lottie Moore
4	24/07/23	Opinion article	Unherd	Labour's new trans policy is welcome, but not enough	• Advocates for Labour to embrace more 'gender critical' policy positions. • Explicitly calls for amendments to primary legislation (the Gender Recognition Act and Equality Act). • No competing views or balance.	https://unherd.com/newsroom/labours-new-trans-policy-is-too-little-too-late/	Lottie Moore

5	24/07/23	Opinion article	The Telegraph	Transgender guidance for schools is needed now – no more delays	• Calls for Parliament to amend the Equality Act. • Heavily criticises specific Labour policy positions when they were not in government, with little discussion of Conservatives or other parties.	https://www.telegraph.co.uk/news/23/07/24/transgender-guidance-for-schools-needed-now/	Lottie Moore
6	03/08/23	Opinion article	The Critic	A bill must be a scalpel	• Calls for Parliament to abandon planned legislation to ban LGBT+ conversion therapy, claiming that this would make it impossible for therapists to do their jobs. • This article serves no educational function, and no balance is offered.	https://thecritic.co.uk/a-bill-must-be-a-scalpel/	Michael Foran (Senior Fellow)
7	13/08/23	Quote for news article	The Sun	"LUDICROUS" NHS bosses tell 999 operators to avoid calling people 'sir' or 'madam' in case it upsets trans patients	• This is a sensationalist article about reports that 999 operators in one region of England have been told to avoid assuming the gender of callers. In that context the Charity agreed to be quoted as follows: "... <i>Lottie Moore, of the Policy Exchange think-tank, said: "To expect anyone to be thinking of preferred pronouns in a 999 health emergency is ludicrous."</i>". The provision of this quote does not serve to advance the Charity's charitable objects.	https://www.thesun.co.uk/health/23471351/operators-avoid-sir-madam-trans-emergency-callers/	Lottie Moore

8	14/08/23	Quote for news article	Daily Mail	Colonialism is to blame for imposing the male-female divide on society, NHS staff are being told in official hospital policies	• In an article concerning internal guidance for staff in Sheffield hospitals, the Charity agreed to give a quote to the <i>Daily Mail</i>, as follows: "<i>Lottie Moore, head of Biology Matters at the Policy Exchange think-tank, said: 'The NHS should not be rewriting biology textbooks and presenting them as fact. These claims are not scientific and should not be presented to patients as such. 'Gender identity beliefs are simply beliefs, and the NHS must understand this.'...</i>" • Giving this quote to the <i>Daily Mail</i> did nothing to advance public education, and its content was one-sided and partisan.	https://www.dailymail.co.uk/news/article-12406055/Colonialism-blame-imposing-male-female-divide-society-NHS-staff-told-official-hospital-policies.html	Lottie Moore
9	23/08/23	Opinion article	The Express	Women are humiliated every day in the name of gender identity and we just let it happen	• Opinion piece advocating for single-sex toilets, arguing that transgender inclusion is a threat to "<i>privacy, dignity and safety</i>". No balance is offered.	https://www.express.co.uk/comment/expresscomment/1805303/gender-neutral-toilets-exclusion-women	Lottie Moore
10	29/08/23	Opinion article	The Telegraph	Let's kick gender ideology out of the NHS	• Opinion piece arguing against the display of any trans or LGBTQ-related posters or badges in NHS settings. No balance is offered.	https://www.telegraph.co.uk/news/23/08/29/lets-kick-gender-ideology-out-of-the-nhs/	Lottie Moore, Sean Phillips
11	19/12/23	Opinion article	The Independent	What does the Government's new transgender guidance mean for schools?	• The Charity agreed to give a quote, saying that new proposed schools guidance on "<i>gender-questioning</i>" children is "<i>powerful rebuttal against activist demands which for too long have played havoc with the wellbeing of children</i>". This is partisan and not educational.	https://www.independent.co.uk/news/uk/government-department-for-education-schools-lgbt-england-b2466752.html	Lottie Moore

12	29/12/23	Opinion article	The Telegraph	Trans ideology is now a growing threat to female grassroots sport	Argues that trans people need to be excluded not only from elite sport, but also amateur sport. This opinion piece is expressed in more intemperate terms than the corresponding research report (see Appendix 1, item 15).	https://www.telegraph.co.uk/news/23/12/29/trans-ideology-is-now-a-growing-threat-to-female-grassroots/	Lottie Moore
13	29/12/23	Opinion article	The Critic	Where are the young gender critical feminists?	Argues that popularity of "<i>queer theory</i>" is the result of "<i>privilege</i>", and that change is "<i>desperately needed</i>" towards a "<i>charge in resisting gender ideology</i>". The article serves no educational purpose and is unbalanced and partisan.	https://thecritic.co.uk/where-are-the-young-gender-critical-feminists/	Lottie Moore
14	18/02/24	Opinion article	The Telegraph	Trans-women's milk as good as breast milk, says NHS trust	The Charity agreed to give a quote for this <i>Telegraph</i> article, arguing trans women cannot produce nutritionally complete breast milk, despite an NHS trust having said the opposite. It is unclear how these issues relate to the Charity's charitable role.	https://www.telegraph.co.uk/news/24/02/18/trans-womens-milk-as-good-as-breast-milk-says-nhs-trust/	Lottie Moore
15	28/03/24	Opinion article	The Critic	The problem with Puberty Blockers	Advocates in favour of a ban on puberty blockers for transgender children, including in research settings, presenting them as a 'problem' rather than presenting neutral, balanced information about the issues.	https://thecritic.co.uk/the-problem-with-puberty-blockers/	Lara Brown (Senior Research Fellow)
16	12/04/24	Opinion article	The Critic	After the Cass Review	Argues that NHS doctors are captured by "<i>gender ideology</i>" and calls for politicians to take control of NHS trans healthcare, based on a number of questionable and one-sided assertions about the facts.	https://thecritic.co.uk/after-the-cass-review/	Lara Brown

17	10/05/24	Opinion article	The Critic	The gender wars have not been won	• Explicitly presents gender-critical measures as "<i>landmark</i>" victories, praises policymakers who have implemented such measures, criticises those who resist them, and calls for further such measures in a range of policy areas. • The article is presented in an unbalanced way, claiming e.g. that gender identity-related treatment presents a threat to vulnerable children and even that it amounts to "<i>abuse</i>".	https://thecritic.co.uk/the-gender-wars-have-not-been-won/	Lara Brown, Iain Mansfield
18	25/06/24	Opinion article	The Spectator	Will Starmer have the courage to stand up for women's rights?	• 10 days before the UK general election, the Charity's representative demands that Keir Starmer should adopt a firmly 'gender critical' platform. • The piece repeatedly assumes that the 'gender critical' approach is correct/desirable, stating e.g. that "<i>gender-distressed children must never again suffer at the hands of an NHS captured by activists</i>" and that "<i>Women across the UK are understandably fearful of how [gender recognition certificates] will be abused</i>". The piece concludes that "<i>the next government must have the courage to stand up for women's sex-based rights...</i>".	https://www.spectator.co.uk/article/will-starmer-have-the-courage-to-stand-up-for-women-s-rights/	Lara Brown
19	03/07/24	TV appearance	TalkTV, Julia Hartley Brewer	Gender Impact - Policy Exchanges publishes 'Biology Matters Project' report	• The Charity's representative appears on television to promote a report that warns that "<i>gender ideology</i>" is embroiled in every government department. The tone of the contribution is alarmist and unbalanced (e.g. "<i>your child could be transitioned without you knowing</i>"); and the contributor makes no effort to present any competing information.	https://x.com/TalkTV/status/1808458955632394682?lang=en	Lara Brown
20	03/07/24	Opinion article	The Critic	Will the next prime minister stand up for	• Similar to #18 above. This version of the article is published on the day before the UK general election, and explicitly praises the Conservatives	https://thecritic.co.uk/will-the-next-prime-minister-stand-up-for-women-s-rights/	Lara Brown

				women's rights?	for steadfastness, and criticises certain Labour figures for being too pro-trans rights.	nd-up-for-women-s-rights/	
21	03/07/24	Opinion article	The Telegraph	Trans ideology has changed Britain beyond recognition	- Published on the day before the UK general election. - Uses trans rights as a basis to advocate for amendment of the Equality Act to remove the Public Sector Equality Duty (referring to the "<i>grotesque failure to repeal</i>" this duty). The tone is unbalanced and alarmist, and is not educational or informative.	https://www.telegraph.co.uk/news/24/07/03/trans-ideology-has-changed-britain-beyond-recognition/	Iain Mansfield
22	16/07/24	Opinion article	The Spectator	Wes Streeting's puberty blocker ban makes sense	- Praises Labour government for banning puberty blockers, expresses support for JK Rowling, and presents the conclusions of the Cass Report in a selective, unbalanced and inaccurate way. - Obvious and well-established contrary evidence is not mentioned, e.g. there is no reference to the fact that there has been significant academic criticism of the methodologies and conclusions in the Cass Report.	https://www.spectator.co.uk/article/wes-streetings-puberty-blocker-ban-makes-sense/	Lara Brown

23	02/08/24	TV appearance	GB News	"The IOC is allowing VIOLENCE against women!" Gender row gets HEATED after "unfair" boxing match - "It is indefensible"	• The article suggests that Imane Khelif and Lin Yu-Ting competing in boxing is violence against women. • The Charity's researcher took place in a TV debate. The article records that she contributed as follows: <i>"Speaking to GB News, Critical policy researcher Lottie Moore said: "Humans are binary and immutable because we are mammals and there is a minority of people who have disorders of sexual development and that can affect a person's reproductive organs. These people are male or female and yesterday what we witnessed was basically just glorified male violence against women and girls. The difference is that in every other circumstance, we consider beating up women to be wrong. But it was deemed acceptable by those at the IOC because they're claiming that it's sport, but it's not. It's violence and it's wrong."</i> • This contribution is immoderate, couched in offensive terms towards transgender people, and does nothing to advance the Charity's non-partisan educational goals.	https://www.gbnews.com/sport/ioc-gender-row-heated-boxing-unfair	Lottie Moore
24	03/08/24	Opinion article	The Critic	A new low for women's sport	• Argues that politicians and the International Olympic Committee need to crack down on trans athletes and introduce sex testing to protect women's sports. • Calls for Downing Street, the Culture Secretary and the Minister for Sport to <i>"intervene"</i> in order to avoid <i>"a scandal"</i>, and says that the current situation is an <i>"outrage"</i>. • The opinion piece has no educational content and makes unevicenced claims (e.g. as far as we are aware, there is no evidence that Stonewall has	https://thecritic.co.uk/a-new-low-for-womens-sport/	Lara Brown

					lobbied the International Olympic Committee on trans inclusion).		
25	08/08/24	Opinion article	GB News	The buck stops with them! Lottie Moore rages at International Olympic Committee amid gender boxing row	- Argues that Imane Khelif and Lin Yu-Ting are men and should not have been allowed to compete in women's boxing. Describes their participation as "<i>male violence against women</i>". The piece is unbalanced and non-educational. - The piece is also factually inaccurate in asserting that "<i>everyone has XX and XY chromosomes</i>". Other combinations are possible, including X, XXY, XXX, XYY, XXXX, XXXY and XXYY. The publicly known information about Imane Khelif and Lin Yu-Ting's status is relatively limited.	https://www.gbnews.com/sport/olympics/lottie-moore-claims-the-blame-lies-with-ioc-amid-gender-boxing-row	Lottie Moore
26	19/09/24	Opinion article	The Telegraph	It's time to retire Trafalgar's fourth plinth	Argues against publicly funded art with progressive political messages, relying at length on transgender issues and "<i>gender identity ideology</i>". The article is not informative or educational, but polemic.	https://web.archive.org/web/250126112834/https://www.telegraph.co.uk/news/24/09/19/the-latest-fourth-plinth-excrescence-proves-britain/	Lara Brown
27	08/11/24	Opinion article	The Spectator	Labour must learn from Kamala Harris's transgender muddle	- Argues Kamala Harris lost to Donald Trump because trans rights are unpopular, and unless Labour goes further in rolling back trans rights, its fate will be the same as hers. - Calls for various items of legislation to be passed in the UK, e.g. "<i>a bill making the current puberty blockers ban permanent</i>", and referring to "<i>schools socially transitioning children behind parent's backs</i>" (a theory for which no evidence is offered). - No balance or competing views are offered. The idea that Kamala Harris lost because of trans	https://www.spectator.co.uk/article/labour-must-learn-from-kamala-harris-transgender-muddle/	Lara Brown

					issues is a fringe view and does not reflect consensus.		
28	20/01/25	Opinion article	The Spectator	The absurdity of funding 'diverse' research	Argues against initiatives to promote diversity in academic research. Uses unbalanced, tendentious language e.g. <i>"divisive political concepts including radical gender ideology"</i>; <i>"salvage this mess and save British science"</i>.	https://www.spectator.co.uk/article/the-absurdity-of-funding-diverse-research/	Iain Mansfield
29	16/04/25	Opinion article	The Spectator	Ministers must now stand up for women's rights	- Argues that the government must accept and implement the <i>"obvious"</i> Supreme Court ruling in <i>For Women Scotland</i>. - Uses unbalanced, tendentious language e.g. <i>"But such is the influence of gender ideology on policy that women's legal rights have often been trampled underfoot"</i>. - This is partisan advocacy in favour of a 'gender critical' approach. It does not seek to present a neutral, informative account of the Supreme Court's judgment.	https://www.spectator.co.uk/article/ministers-must-now-stand-up-for-womens-rights/	Lara Brown
30	16/04/25	Quote for news article	Daily Mail	Trans women are NOT legally women: Definition of a woman relates to "biological sex", Supreme Court rules in landmark judgment that could end transgender access to single-sex spaces	- The Charity's contribution is: <i>"By confirming that "sex" in the Equality Act 2010 means "biological sex", the Supreme Court has secured women's sex-based rights – rights to which they have always been entitled as a matter of law. While this is a welcome victory, it should never have been left to the courts to answer the question of "what is a woman?". Had the Government used their statutory powers to clarify that sex in the Equality Act 2010 means biological sex, when Policy Exchange called for them to do so in 2023, the Scottish Ministers would never have been able to issue unlawful advice on the subject."</i> - This is partisan advocacy in favour of a 'gender critical' approach. It does not seek to present a neutral, informative account of the Supreme Court's judgment.	https://www.dailymail.co.uk/news/article-14617521/Definition-woman-relates-biological-woman-biological-sex-Supreme-Court-rules-landmark-judgment-end-transgender-access-single-sex-spaces.html	Lara Brown

31	16/04/25	Quote for news article	Daily Mail	What does the Supreme Court gender ruling mean? All your questions answered from sharing public toilets to maternity leave and competitive sports	• The Charity is quoted as follows: "<i>Lara Brown, senior Research Fellow in the Culture and Identity Unit at Policy Exchange, said the Supreme Court ruling that found biological men are not female is 'very significant'... It now means that women are able to gather together without men present. If women wanted to form a single sex group because they wanted to organise an informal therapy session for female victims of male violence, they're legally allowed to. If a breastfeeding support group wants to exclude men they're legally allowed to. If we'd lost this case, that wouldn't have been the case and biological men with the certificate could have sued on discrimination to be allowed to access these spaces.</i>" • The Charity uses the expression "<i>If we'd lost this case...</i>" The Charity was not a party to the litigation. The litigation was a judicial review against the Scottish Government, brought by the non-charitable political lobby group For Women Scotland. By identifying For Women Scotland as 'we', the Charity is taking sides (and claiming victory) in a case which was politically highly controversial. • The contribution is inaccurate and hyperbolic, in a way that obscures the legal effect of the judgment rather than helping to explain it. Women were lawfully able to "<i>gather together without men present</i>" before the judgment. It was always possible to exclude trans women from a specific single-sex space if it could be shown it was a proportionate means of achieving a legitimate aim.	https://www.dailymail.co.uk/news/article-14617977/What-does-Supreme-Court-gender-ruling-mean-women-questions-answered-sharing-public-toilets-maternity-leave-competitive-sports.html	Lara Brown
----	----------	------------------------	------------	--	---	---	------------

32	16/04/25	Opinion article	The Express	NHS bosses urged to admit defeat in battle with nurse over trans woman in changing room	• The Charity is quoted as: <i>"Yesterday's Supreme Court judgment will help to secure women's sex-based rights, but it does not mark a total victory over the pernicious influence of gender ideology. We wait to see what attention Sandie Peggie's tribunal against NHS Fife give to the Supreme Court decision that sex in the Equality Act is biological, and cannot be altered by a Gender Recognition Certificate. While the Supreme Court have confirmed that it is lawful for institutions to exclude biological men from women's spaces, this does not mean they will always choose to do so. The Health Secretary must now ensure that guidance to NHS organisations is crystal clear: suitable and sufficient single-sex changing facilities should be provided for all staff, or risk sanctions."</i> • This is partisan advocacy in favour of a 'gender critical' approach. It does not seek to present a neutral, informative account of the Supreme Court's judgment.	https://www.express.co.uk/news/politics/2042752/nhs-bosses-admit-defeat-battle	Lara Brown
33	11/05/25	Opinion article	The Spectator	What is the Tate Modern for?	• Claims that <i>"at the Tate, only one kind of politics is allowed. Migration is always good; colonialism is always bad. The climate is always in a state of crisis; the West is always responsible. Gender will always be a construct; notions of the immutability of sex will always be condemned."</i> • Calls on institutions to defund art with a progressive political agenda. • The article is unbalanced, not informative and not educational.	https://www.spectator.co.uk/article/the-tate-modern-has-lost-its-sense-of-purpose/	Lara Brown
34	16/05/25	Opinion article	The Spectator	Gender ideology is still dictating NHS policy	• Attacks the Labour government's approach to trans children.	https://www.spectator.co.uk/article/gender-ideology-is	Lara Brown

					• Argues that children's gender clinics are still too permissive towards trans children, referring repeatedly to 'gender ideology'. • Claims that <i>"trans activists have continued to shape public policy, to the detriment of children's safety."</i> • The article is unbalanced, not informative and not educational.	-still-dictating-nhs-policy/	
35	29/05/25	Opinion article	The Spectator	The next front in the gender wars	• One-sided article celebrating recent 'gender critical' policy developments, criticising those who opposed them, and insinuating that there is a secret transgender lobby with power over legislation. • The article is unbalanced, not informative and not educational.	https://www.spectator.co.uk/article/the-next-front-in-the-gender-wars/	Lara Brown
36	07/06/25	Quote for news article	The Telegraph	Public sector struggling to define what a woman is, trans report finds	• The Charity's contributor claims that there has been "progress" in a gender-critical direction but <i>"there is still a great deal of ideological capture"</i>; and calls for <i>"much more to be done"</i>. • This is not a balanced or politically non-partisan approach, and does not advance public education.	https://www.telegraph.co.uk/news/25/06/07/public-sector-struggling-define-what-a-woman-is-trans/	Lara Brown