



The Free Speech Union
85 Great Portland St.
London W1W 7LT

FreeSpeechUnion.org

Andrew Bailey

29th August 2024

Governor,
Bank of England,
Threadneedle Street,
London, EC2R 8AH

Dear Governor,

I am writing to you in my capacity as General Secretary of the Free Speech Union ('FSU'), a non-partisan, mass membership public interest body that stands up for the speech rights of its members and campaigns for free speech more widely. Since we were created in February 2020, we have helped more than 2,700 people defend their right to lawful free speech.

One of our members, a Bank of England employee, has notified us that on 3rd July 2024 a live webinar training course entitled 'Trans Inclusion' was delivered to staff by the external provider [Inclusive Employers](#). We have reviewed the content of this course and have a number of concerns which we have outlined below. More generally, the FSU is troubled that such politically contentious material has been promoted by a public body like the Bank of England which, through the Prudential Regulation Authority, is responsible for supervising the whole of the UK's financial sector.

While fostering a sense of inclusion among employees is, of course, a worthwhile objective, training courses like that delivered on 3rd July are ideologically driven. As a result, they may have the unintended effect of fostering an intolerant workplace culture in which some employees feel they cannot express certain, perfectly legitimate points of view. Our primary concern is that the 'Trans Inclusion' course appears to promote gender identity ideology while stigmatising gender critical beliefs, which are protected under the Equality Act 2010.

Specifically, the course draws on ill-defined concepts rooted in critical social justice theory to portray gender critical views as discriminatory. For example:

- Discouraging ‘microaggressions’¹ towards trans people, which include saying:
 - “Everyone is born a man or a woman, its [sic] science”
 and
 - “Using the wrong pronouns”
- Mandating the following “inclusive” behaviour:
 - “Educate colleagues”
 - “Share pronouns in your email signature, at the start of meetings”
 - “Challenge your own transphobic biases”
- Encouraging the use of terminology that affirms your belief in gender identity ideology, such as “queer” and “cisgender”.

The ‘Trans Inclusive’ course outlines an organisational ‘scale’ according to which the endpoint all employees should be working towards is “trans inclusion is fully embedded into [the] workplace culture”. If this means embedding beliefs and concepts such as those above within the Bank of England’s workforce, then the practical result will be a hostile and non-inclusive environment for any employees who believe that biological sex is binary and immutable. Employees who believe in the biological reality of sex will be required to hide their true beliefs and compelled to do things that affirm an ideology they do not believe in, such as sharing their pronouns.

As the Bank of England employee who came to us said, “I see the biased treatment of different groups and I have lost trust in our leadership.”

Regrettably, this lack of trust is not unwarranted. We know from our work that the punishment of individuals for holding gender critical views is a common occurrence in UK workplaces, with approximately 40% of our cases involving gender critical women who have got into trouble for standing up for their beliefs. Whenever the FSU is involved in a case from beginning to end, we achieve a favourable outcome for our member over 75% of the time, often by pointing out that gender critical beliefs are protected under the Equality Act. This underlines how poorly the legal rights of employees are understood by British employers.

Finally, the timing of this training – a day before the General Election – suggests a political agenda behind it, rather than just a concern for inclusion. Inclusive Employers own website contains an [‘Inclusion Manifesto’](#) for the new Labour Government. It is sub-titled, “The tipping

¹ IE website defines microaggressions as “the everyday verbal, nonverbal, and environmental slights, snubs, or insults, whether intentional or unintentional, which communicate hostile, derogatory, or negative messages to target persons based solely upon their marginalized group membership”

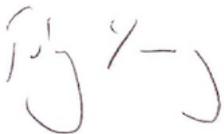
point in business accountability” and on page 3 states: “This new era brings with it incredible opportunities for businesses able to get ahead of the curve.” The “new era” in question is a Labour Government, something Inclusive Employers clearly welcomes, not least because Labour said in its manifesto it intends to bring forward a “full, trans-inclusive ban on conversion practices”, which is rooted in the same ideology as the ‘Trans Inclusive’ course. We think it was irresponsible of the Bank of England to ask its employees to take a course the day before the General Election that might as well have been called ‘Why You Should Vote Labour’.

We respectfully ask the Bank of England to demonstrate its commitment to protecting its employees’ right to freedom of speech by:

- Retracting those elements of the training course that promote gender identity ideology
- Affirming its employees’ right to express gender critical views without being punished
- Ensuring that any future diversity training courses are genuinely inclusive and make clear that views that some regard as discriminatory are, in fact, protected by the Equality Act and for an employer to punish employees for expressing them, or for refusing to affirm gender identity ideology, would itself be an unlawful act of discrimination.

This final point – that it’s important for diversity training courses to stress that a wide range of different views about contentious issues are perfectly legitimate – was one of several insights to emerge from research that the FSU completed in March 2024. Entitled ‘[The EDI Tax: How Equity, Diversity and Inclusion is Hobbling British Businesses](#)’, our representative survey revealed that 62% of British workers have had to conceal what they really think about the workplace training they have received. This includes 22% who have been compelled to say things they do not believe.

Yours sincerely,



Toby Young
General Secretary
The Free Speech Union
toby@freespeechunion.org

cc: Ben Stimson, Chief Operating Officer, Bank of England