

SAASSBMK DOCUMENT IDENTITY			
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Transgender, Non-Binary and Intersex Inclusion Policy

Background

Research clearly indicates transgender, non-binary and intersex communities experience disproportionately high levels of sexual violence and domestic abuse.

In 2022, Galop found that 64% of trans respondents felt their experiences of sexual violence was linked to, or because of, their trans identity. Reasons included being “hypersexualised and fetishised because of who they were. Participants also described their experiences of sexual violence as the result of the perpetrator’s desire to convert their... gender identity, or due to anti-LGBT+ prejudice.”

Trans, non-binary and intersex groups may find it more difficult to identify specialist services that will be inclusive and feel accessible to them. Pain R. Cygnus Support and O’Neill, S. (2021) report found that members of the trans community have higher rates of mental ill-health than cis-gendered people and yet are poorly served by specialist support services. They found that trans people had experienced transphobia and retraumatisation from professional services who were ill-equipped to support them.

In 2025, the UK Supreme Court ruled that the definition of “sex” in the Equality Act 2010 should be interpreted as “biological” sex only. This means that a person’s legal sex is the one that was recorded at their birth and that obtaining a Gender Recognition Certificate (GRC) does not change your legal sex for Equality Act purposes.

The Equality and Human Rights Commission (EHRC) drafted a Code of Practice which was last updated in May 2026 which does not impose legal obligations but aims to support services such as SAASSBMK in interpreting the Equality Act 2010 and its implications on providing services.

These rulings and guidance may cause confusion and fear among the trans, non-binary and intersex groups. SAASSBMK is committed to fulfilling its legal obligations under the Equality Act and upholding our principles of dignity, equality and inclusion.

The purpose of this policy is to ensure that all those who need support after sexual violence and domestic abuse (including cis, trans, non-binary and intersex survivors) can access it in a format which is right for them.

Scope

This policy applies to all trustees, employees, volunteers and service users at Sexual Assault and Abuse Support Service Buckinghamshire and Milton Keynes (SAASSBMK).

SAASSBMK is committed to strive for equality in the provision of its services and in the treatment of staff, volunteers and trustees.

SAASSBMK is an intersectionally feminist organisation which stands against all forms of sex and gender-based inequalities and discrimination against sex, gender-identity

and sexuality experienced by all, including cis, trans, non-binary and intersex survivors. We expect everyone at SAASSBMK, regardless of any belief they hold, to be able to work collaboratively, inclusively and without discriminatory conduct.

Please also see our [Equity, Diversity and Inclusion Policy](#) for more information.

Policy

Definitions

The term **transgender** describes people who understand or express their gender differently than what society expects of the sex they were assigned at birth. This term includes a variety of gender identities and expressions, including people who change from one gender to another; people who express different gender characteristics, and people who gender expression cannot be clearly identified as 'masculine' or 'feminine'.

The term **cisgender** or **cis** is used to describe someone whose gender identity matches the sex they were assigned at birth.

The term **non-binary** describes people who feel their gender cannot be defined as either male or female.

The term **intersex** often refers to an assigned gender at birth if a person is born with a combination of male and female biological traits.

Some non-binary or intersex people may feel comfortable within trans communities but this isn't always the case.

The acronym TNBI will be used in this policy to refer to anyone identifying as trans, non-binary or intersex.

In the Equality Act 2010, a person has the protected characteristic of 'gender reassignment' if the person: 'is proposing to undergo, is undergoing or has undergone a process (or part of a process) for the purpose of reassigning the person's sex by changing physiological or other attributes of sex'. SAASSBMK supports any person who is proposing to undergo, is undergoing or has gone through the gender reassignment process and is committed to ensuring that anyone who does not identify with the gender they were assigned at birth is treated fairly and respectfully, like all other service users.

The Gender Recognition Act 2004 (GRA) makes it a criminal offence for a person who has acquired protected information (information which relates to a person's transgender status or information which identifies a person as transgender) in an official capacity (such as through a recruiting process) to disclose the information to any other person.

SAASSBMK Services

All services at SAASSBMK are offered to anyone affected by sexual assault and domestic abuse, regardless of their sex, gender and/or the way they identify. This is in line with our organisational Statement of Values.

Service provision at SAASSBMK is delivered according to demand and the funding and resources we have available. In the event that a service user is requesting a service that we are not currently offering, we will make every effort to offer alternative services within SAASSBMK or support them in identifying a suitable alternative elsewhere.

Services may be offered for specific groups of people based on sex or gender in line with the Equality Act 2010, however our offices are located in a mixed gender building and due to demand for our services, we provide a range of support services simultaneously. This means we are unable to guarantee that the entire building will be restricted to a specific group of people at any time.

Where services are provided based on sex or gender (for example in support groups) these are limited to those who identify with the group for which the service is provided. In the event a service user is not comfortable with the participation of other service users or SAASSBMK colleagues whose sex, gender or identification does not align with their preferences, they are encouraged to talk to us and we will try to offer alternative solutions or redirect them towards third party organisations that can support them.

SAASSBMK affirms that self-definition is at the sole discretion of the individual in question.

Procedure for Service Users

Upon referral into one of our centres, service users will be asked for their preference on the sex or gender of their worker and offered support around any concerns they may have about accessing our services. In case their needs cannot be accommodated, we will try to redirect them towards third party organisations that can support them.

Service users will be informed of what services are available within SAASSBMK, how these can be facilitated to meet their individual needs and any impact of their request on waiting times. Where we are not able to offer a requested service or where waiting times are extended and it is not deemed to be in the best interest of the service user, we may also provide information about alternative services external to SAASSBMK that may better meet their needs.

Before entering any service, service users will be provided with an assessment and will be asked to read and sign a service user agreement. This agreement will detail any information about the service that we intend to provide and any boundaries and limitations, such as confidentiality. All agreements will ask the service user to ensure that their conduct is in line with our Equity, Diversity and Inclusion policy and any breaches will result in the cessation of any services received with immediate effect.

Sharing the protected characteristics of staff and volunteers is in general not permissible in line with General Data Protection Regulation (GDPR). However, where a service user requests information about a worker's sex assigned at birth or gender identity, we will consider the request on a case-by-case basis and will only share information where it is deemed in the best interest of the service user (for example, to build confidence in accessing support) **and** where we have the consent from the worker to share this information.

In line with our Equity, Diversity and Inclusion Policy, we expect everyone at SAASSBMK, regardless of any belief they hold, to be able to work collaboratively, inclusively and without discriminatory conduct.

Therefore, it is unacceptable for any workers at SAASSBMK to decline working with a service user because of a protected characteristic. Working with TNBI survivors forms a part of SAASSBMK's core training for all staff and volunteers and we encourage all workers to speak with their Line Manager if they have any concerns or require support or additional training.

If an individual believes they have experienced discrimination because of their sex, gender, belief or any other protected characteristic, concerns may be raised via our Dignity at Work Policy (for trustees, staff and volunteers) or via our Complaints Policy (for service users or members of the public, this policy and procedure is available via our website). Any worker found to have bullied, harassed or unlawfully discriminated another person in violation of our policies will be subject to disciplinary action.

Recruitment

In line with SAASSBMK's Recruitment Policy, certain roles within SAASSBMK may be restricted to a particular group of people due to a Genuine Occupational Requirement, exempt under Schedule 9, Part 1 of the Equality Act 2010. Where roles are restricted (including trustee, staff and volunteer roles), the nature of any restrictions will be made clear in the role advertisement.

Recruitment panels must be aware that the Gender Recognition Act 2004 (GRA) makes it a criminal offence for a person who has acquired protected information (information which relates to a person's TNBI status or information which identifies a person as TNBI) in an official capacity (such as through a recruiting process) to disclose the information to any other person.

Identity and document checks are only completed as part of the Right to Work checks after an offer of employment has been made but before the individual has started work.