



Association for Public Service Excellence

Changing Facilities and Gender Access Survey - Results

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association for public service excellence

**Changing facilities and gender
access policies survey**






Purpose

- Gather insights into current practices, policies and challenges in accommodating gender diversity in public leisure facilities.*
- The survey was prompted by the UK Supreme Court's 2025 ruling affirming the legal definition of "woman" as based on biological sex.
- **APSE telling you what you told us (*but anonymised*)**

**Aggregated figures – may not reflect the experiences of your council*

 Changing Facilities and Gender Access Policies Survey

2. Changing and Toilet Facilities

What types of changing facilities are available at your centres?

☐ Male only

☐ Female only

☐ Unisex / Gender-neutral

☐ Family / Accessible changing rooms

☐ Other (please specify)

Are toilet facilities separated by sex, gender identity, or available as unisex?

☐ Male and female only

☐ Male, female, and unisex

☐ Unisex only

☐ Other (please specify)

Does your facility have a policy regarding access to changing and toilet facilities for transgender individuals?

☐ No

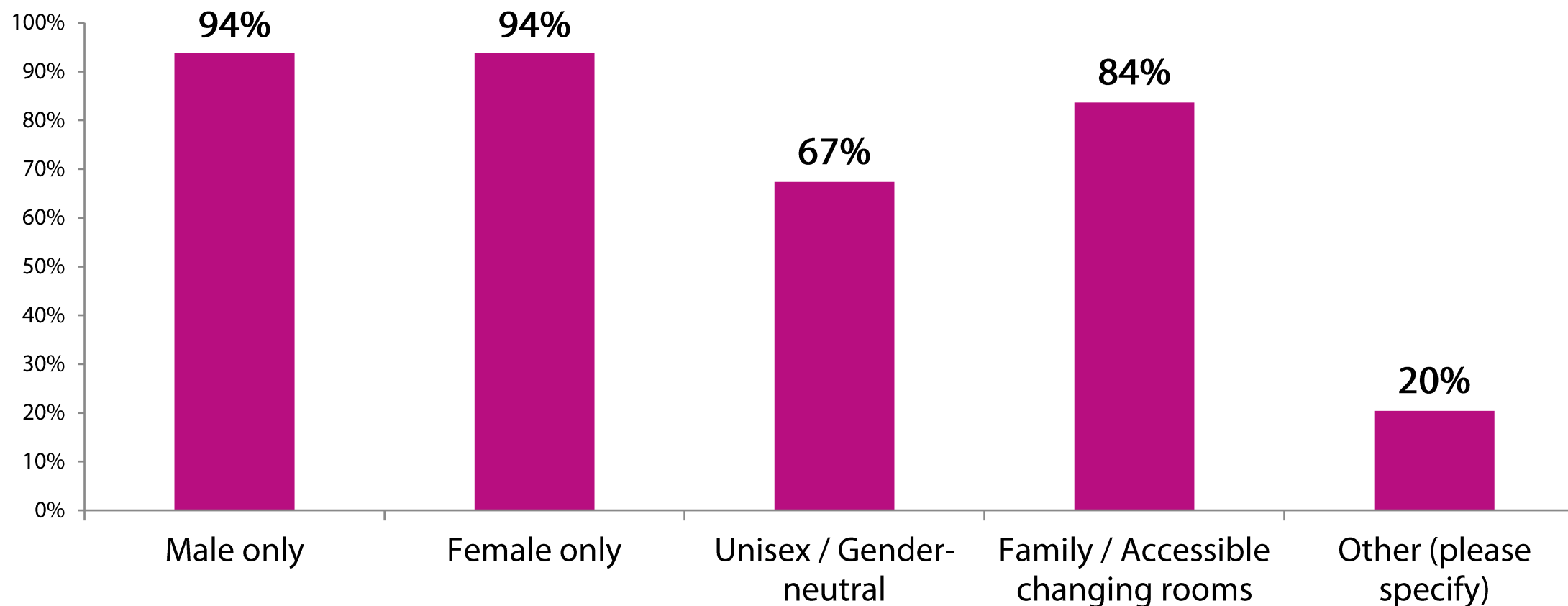
☐ Yes

If "Yes" please briefly describe or provide a link to the policy:

How do you currently accommodate transgender individuals in sex-segregated spaces such as changing rooms or toilets?

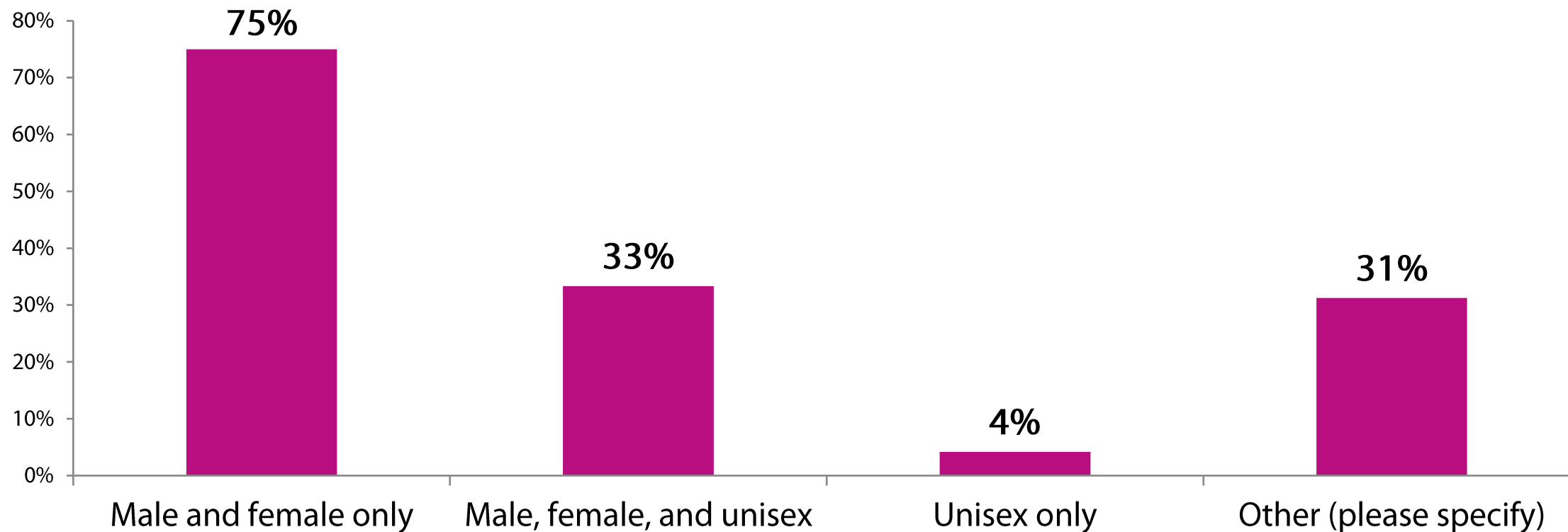


What types of changing facilities are available at your centres?





Are toilet facilities separated by sex, gender identity, or available as unisex?





Does your facility have a policy regarding access to changing and toilet facilities for transgender individuals?

"The policy is to deal with each individual separately, based on where they feel comfortable to change."

55%

"Yes"

"The policy was in line with previous ukactive guidance which is now being reviewed and therefore it has been temporarily suspended pending this review."

"Falls within equalities and accessibility policies of the County Council and service where we seek to remove barriers to participation. We also benchmark our service with ukactive EDI and currently have a good rating in the benchmark."

"We are able to provide a private changing facility if required, we have a sign in reception."



How do you currently accommodate transgender individuals in sex-segregated spaces such as changing rooms or toilets?

"The ladies changing rooms have cubicles, the men's changing rooms do not, we can offer private changing spaces."

"Try to direct to village unisex changing facilities and accessible toilets."

"The gender a person associates with most of the time is the changing room they should use. This will now need to change."

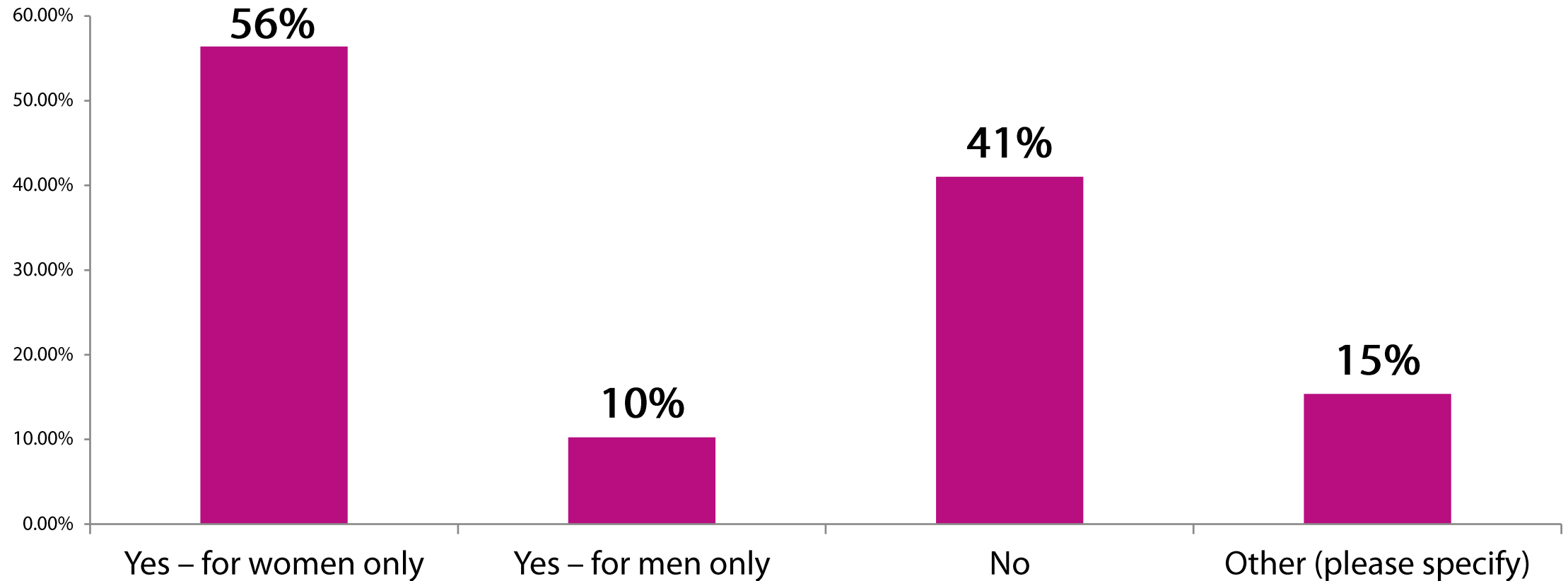
"Gender neutral toilet facilities where we are able. The issue remains that our older sports changing pavillions are not designed to cater for transgender use and we would be required to retro fit at great cost to facilitate this."

"As per the guidance from EHRC we will be requesting that anyone presenting as Trans use a gender-neutral facility (i.e. the accessible change)"

"Based on biological sex as per recent ruling. Where the biological sex is different to the preferred gender this is dealt with on a case-by-case basis."



Does your facility host or operate any single-sex swimming sessions or sports clubs?



If yes, what eligibility criteria are used to determine access to single-sex sessions?

"Previously this was by self (customer) identification. But we would also use the proportionate means to a legitimate end provisions if necessary."

"Appropriate costumes and sports wear."

"Religious reasons."

"Currently by customer choice i.e. transgender individuals would be allowed into a female only session. But this will be reviewed in light of guidance."

"Currently we allow customers to swim based on whatever sex they identify, However, we have not had any Transgender individuals attend the female only session and we don't know how faith-based customers would feel about this."

"Biological sex. However where this may differ from physical appearance or gender this is considered on a case-by-case basis to reflect the need of the session with proportionate measures used to protect the session."

"No such criteria but may need to develop."



Do you host or run any sporting competitions or leagues?

"Facilities host events but events are managed by outside providers."

"We host through National Governing Bodies who oversee eligibility."

45%

"Yes"

"We would advise that we have individual changing in the changing area and that we also have individual toilets or accessible toilets available."

"This would be down to what the individual clubs or leagues stated in their own individual club statements, again, from my knowledge, this occurrence hasn't happened with any clubs or leagues we currently host."

Based upon biological sex or governing bodies policies for that event."



Are there any current challenges or considerations you face in implementing or updating policies relating to sex, gender identity, and facility access?

"Experienced challenges from women only groups who want transgender women to be excluded from women only spaces. We have not experienced issues with transgender women accessing women only spaces. The challenge now is how we respond to the supreme court judgement."

"The challenges are around obtaining clear and specific guidance to allow the operator to fulfill obligations to all our customers."

"Massive implications for our industry. Village change is the general ultimate solution. The biggest challenge is for someone that has fully transitioned. They now look fully in the gender that they are presenting, but legally have to use the changing room of their birth sex."

"Yes, the supreme court ruling came out and we have addressed this with both our private partner and the equalities officer in the council, but in the absence of further guidelines it was not felt appropriate that we make arbitrary decisions."



Are there any current challenges or considerations you face in implementing or updating policies relating to sex, gender identity, and facility access?

"The cost of retro fitting for gender neutral facilities. Many women do not like using men's toilet facilities which generates a requirement for both male and female and transgender toilet availability. This with limited Council budgets."

"Corporately the council does not have a defined policy and so we are working to follow industry guidance."

"We have looked into writing a specific policy but it got very confusing and as we haven't had any issues relating to gender identity brought to our attention we decided to continue with the existing arrangement of customers choosing to change where they feel is appropriate."

"We may need to reconfigure existing spaces to accommodate the new ruling that may impact financially on service provision or require capital investment."



Conclusion: Uncertainty...

- While some progress is being made toward inclusive provision and transgender inclusion, many organisations remain uncertain or constrained and eagerly await updated guidance.
- The APSE survey suggests that the majority of council leisure provision already allows for unisex provision or changing 'villages'.
- Briefing is available to download from the APSE website



Changing facilities and gender access policies survey



Briefing 25/18
July 2025



Association for Public Service Excellence

Thank you

- Results of APSE's Changing Facilities and Gender Access Policies Survey - *Matt Ellis, APSE Principal Advisor*



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