



NATIONAL RIFLE ASSOCIATION

TRANSGENDER INCLUSION POLICY

Adopted by Council on 19 August 2022

Transgender Inclusion Policy

1. Introduction

- 1.1 The National Rifle Association (NRA) is fully committed to the principles of equality of opportunity and is responsible for ensuring that no job applicant, employee, member, participant or volunteer is unlawfully discriminated against because of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, ethnicity, religion or belief, sex and sexual orientation.
- 1.2 It is the responsibility of each individual to treat others with respect, dignity, sensitivity and fairness. Discriminatory, offensive, violent or abusive behaviour or language is completely unacceptable and all related complaints will be acted upon.

2. Policy Statement

- 2.1 The NRA promotes a zero tolerance approach to transphobia. Transphobia includes discriminatory language or behaviour directed towards anyone who comes under the umbrella term of transgender¹; in addition it may be towards a transsexual person's friend or supporter, or anyone that may be perceived to be a transsexual person (whether they are transsexual or not).
- 2.2 The NRA recognises that there can be differences between a person's anatomical gender and their gender identity/expression. The NRA will not discriminate against people on the grounds of crossdressing, gender expression, transsexualism, intersex conditions or any process of gender reassignment, begun or complete.
- 2.3 Where this policy refers to 'trans people' or simply 'trans', it has in mind people living with any of these identities. Where it refers to 'gender identity', it covers both the fixed identity of people living in the gender of their birth and the more fluid identities of many trans people.
- 2.4 The NRA will ensure that:
 - Where an individual has disclosed their trans status to the organisation on a confidential basis, their confidentiality will be respected and information about their trans status will not be revealed without their prior agreement.
 - Individuals (including members and visitors) will not be denied access to activities, training, competitions or tournaments or fair and equal treatment because of their gender identity or expression.
 - Staff (including volunteers) will not be excluded from employment, promotion, rewards or training opportunities because of their gender identity.

¹ see Definitions and Terminology section below.

- Transphobic abuse, harassment or bullying e.g. name calling, derogatory jokes, unacceptable or unwarranted behaviour, intrusive questions will be treated as a serious disciplinary offence and will be dealt with under the appropriate disciplinary procedure.

2.5 The NRA will provide a supportive environment for individuals who wish their trans status to be known. However, it is an individual's right to choose whether they wish to be open about their gender identity. To 'out' someone without their permission is a form of harassment and a criminal offence and will be treated as such.

3. Purpose and Scope

3.1 The purpose of this policy is to clarify guidelines for transgender and non-binary people who are involved with, participate and compete in shooting run under the auspices of the NRA.

3.2 The NRA has adopted this policy framework to ensure the sport of shooting is wholly inclusive and transsexual people are welcome in all disciplines.

3.3 The policy covers competitions which may be run under the auspices of the NRA and run in accordance with its regulations and policies governed by the International Governing Bodies (IGBs). The NRA has adopted a level of expectation around events which includes transsexual people at every reasonable opportunity in domestic competitions.

4. Guidance and Legislation

4.1 The practices and procedures within this policy and documentation are based on the principles contained within UK legislation and International Olympic Committee guidance and take the following into consideration:

- Equality Act 2010
- IOC Framework on Fairness, Inclusion and Non-discrimination on the basis of gender identity and sex variations 2021
- Data Protection Act 2018
- Gender Recognition Act 2004

4.2 The Equality Act includes gender reassignment as one of the nine protected characteristics. The Act offers far-reaching protection from discrimination on grounds of gender reassignment and protects:

- A person who has proposed, started or completed a process to change their gender;
- Trans people who are not under medical supervision;
- People who experience discrimination because they are perceived to be trans;
- People from discrimination by association because of gender reassignment, e.g. the parents of a trans child from being discriminated against because their child is transitioning

4.3 The Equality Act also makes it unlawful on the grounds of gender reassignment to:

- Subject someone to harassment – unwanted conduct that violates a person’s dignity and creates an intimidating, hostile, degrading, humiliating or offensive environment;
- Victimise someone because they have made a complaint or allegation or have given evidence against someone else in relation to a complaint of discrimination; and
- Discriminate against someone in some circumstances after the working relationship has ended.

4.4 The Gender Recognition Act allows trans people who are able to satisfy certain evidential requirements to apply to the Gender Recognition Panel in order to seek full legal recognition of their acquired gender. If an applicant is successful they will be issued with a full or interim gender recognition certificate (GRC). A full GRC enables the individual to obtain a new birth certificate which does not disclose the fact that they have changed gender. The Gender Recognition Act also makes the disclosure without permission by a third party of an individual’s trans status a criminal act.

5. Trans people in shooting

5.1 The NRA fully promotes inclusivity in shooting and, as a non gender-affected sport which is largely dependent on skill rather than physical capacity, the NRA will not restrict the participation of a transsexual person in the activities of the organisation. As such, for any NRA competition that has separate classes for men and women, individuals may participate in the gender with which they identify. No evidence of gender identity or hormone levels are required to participate.

5.2 For any event or competition governed by the International Shooting Sport Federation (ISSF) the IOC’s Framework on Fairness, Inclusion and Non-Discrimination will provide guidance on the participation of trans individuals. Provided they meet eligibility criteria that are consistent with the principles of safety and fairness, trans athletes will be allowed to compete in the category that best aligns with their self-determined gender identity.

6. Trans people as spectators

6.1 Spectators may themselves be transgendered and may be subjected to transphobic comments from others around them. Transphobic language and behaviour can be reported either directly to range control officers (RCO), club officers or any management representative. In the same way that racist or homophobic language and behaviour is challenged, it is vital that coaches and staff respond to transphobic language whenever it happens and take all reasonable steps to resolve the situation safely and effectively.

6.2 Transphobic comments from spectators may also be directed at shooters. This is not always because a shooter is known to be trans, but simply as a term of abuse, in the same way that ‘gay’ may be used as a derogatory term, even if there are not gay people present. Whenever phobic language is used it creates a hostile environment and must be addressed.

7. Transsexual people as NRA employees

- 7.1 The NRA will not discriminate against transsexual people in any aspect of their employment and will endeavour to ensure that the culture of the workplace is supportive and welcoming throughout the transitioning process or as a transgender person.
- 7.2 In accordance with the NRA's Equality Policy, any discrimination or unfair or unreasonable behaviour or treatment will be taken seriously and action taken in accordance with the Employee Handbook.
- 7.3 The NRA will work to meet the individual needs of each person to ensure that they have a positive experience of their employment with the NRA.

8. Single-sex spaces

- 8.1 Individuals may use single-sex spaces such as ablution blocks in accordance with their gender identity.

9. Confidentiality

- 9.1 It is illegal under the Gender Recognition Act 2004 for a person who has acquired the information in an official capacity to disclose personal information about a transgender person's gender history once they have applied for a gender recognition certificate or been granted one, except with their permission or in other very limited circumstances. Any information relating to a transsexual person's former gender (regardless of whether or not they have a Gender Recognition Certificate) is also likely to be classed as sensitive personal data under the Data Protection Act 2018.
- 9.2 More generally, transgender individuals may be anxious to protect their privacy surrounding their acquired gender. This policy recognises that the right to confidentiality must be maintained.

10. Roles and Responsibilities

- 10.1 The National Rifle Association Board is accountable for the adoption, implementation and monitoring of this policy.
- 10.2 Clubs and event organisers, when dealing with a request from a transsexual person to compete, will:
- Treat the individual with dignity and respect.
 - Respect the private and confidential nature of the individual's situation.
 - Agree with the individual which information is to be shared with others and if this is necessary how it should be shared. In general no information should be shared unless express permission is given by the individual.
 - Encourage the individual to feedback any inappropriate language or behaviour from other

members or spectators so that it can be dealt with.

11. Resolution of Complaints

11.1 An individual who feels that they have not been treated fairly in accordance with this policy should first try to resolve the matter informally by discussion with the individual/s involved. If that is unsuccessful, or is not appropriate, the individual can raise a complaint in accordance with the NRA’s Complaints Policy which will be treated seriously, confidentially and respectfully.

12. Monitoring

12.1 The National Rifle Association will monitor this policy regularly including any complaints or appeals by transsexual individuals and their involvement in the shooting in all capacities.

13. Review

13.1 This policy will be reviewed and revised as required in response to updated legislation and guidance and lesson learnt from any complaints in relation to this policy.

Definitions and Terminology

TERM	DEFINITION
------	------------

Assigned Sex	The sex, male or female, assigned at birth based on physical characteristics.
Gender-affected sport	Where a sport is 'gender-affected' the average woman will always be at a disadvantage when competing against men.
Gender Dysphoria or gender identity disorder	A condition where someone experiences discomfort or distress because of a mismatch between their gender identity and sex assigned at birth. Signs can appear at a very young age e.g. a child refusing to wear typical clothes of their gender or taking part in non-typical games – this occasionally passes but usually continues to adulthood. The onset of puberty may increase the risk of self-harm, addiction or suicide.
Gender identity or affirmed gender	The gender to which a person identifies or has transitioned or is transitioning, and which is opposed to that which was assigned at birth. Every person has a right to be able to express their gender in a way that is comfortable to them. Always use a transgender person's chosen name.
Gender Reassignment	A term used for a person 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. (Gender Reassignment is a protected characteristic under the Equality Act 2010).
Gender Recognition Certificate (GRC)	Trans people whose birth was registered in the UK can apply to the Gender Recognition Panel to have their acquired/affirmed gender recorded on their birth certificate. If accepted, the applicant receives a GRC which permits the holder to be recognised for all legal purposes, including marriage, in their acquired gender.
Intersex	A condition where a child at birth does not clearly appear male or female. Parents may be recommended to wait until the child can choose their own gender identity before any surgery is carried out.
Non-binary/genderqueer/gender fluid	Someone who defines their gender as falling somewhere in between man and woman; for example, those who are both man and woman, or neither man nor woman, or moving between genders.
Non-gendered	A person who does not identify with either male or female gender.
Real-Life Experience/living in full-time gender	The Real-Life Experience (RLE), is a period of time in which transgender people live full-time in their preferred gender role. The purpose is to confirm that a transgender

	person can function successfully as a member of the opposite gender in society, and confirms that they are sure they want to live as that gender for the rest of their life.
Trans	The umbrella term for any person whose gender identity does not correspond to that person's biological sex assigned at birth, and all cross over identities that challenge the socially constructed border between the genders. This includes androgyne, polygender, cross-dressing and transvestite people.
Transgender woman or girl	A person assigned male at birth who identifies with the female gender but has not necessarily transitioned.
Transgender man or boy	A person assigned female at birth but identifies with the male gender but has not necessarily transitioned.
Transition	Someone who is taking or has taken the 4-5 year complex medical process of changing their birth sex and their legal documentation to become the opposite sex.
Transphobia	Discriminatory, abusive or negative language or behaviour directed towards a transgender person, and may include refusal to provide access to services equal to non-trans people. It is as unacceptable as racism, sexism or homophobia.
Transsexual	A person who proposes, or undergoes, to realign their gender and sex through use of medical intervention.