

Transgender Inclusion & Equality Policy

Introduction

At The Gym Group we are committed to breaking down barriers to fitness for all in order to provide a workplace and workout space that is fully inclusive. We value the difference that our diverse workforce, members and gym communities bring and therefore, everyone who walks through our doors should feel welcome and accepted for who they are.

We consider any act of unlawful discrimination, harassment or bullying in relation to an individual's gender identity to be in direct conflict with our Company mission and our culture and values as outlined in our [Diversity, Inclusion and Equality Manifesto](#).

This policy outlines our commitments and the steps that we take to ensure that transgender candidates' employees, members, self-employed PT's, contractors, and anyone who engages in anyway with The Gym Group are treated with dignity and respect and are not disadvantaged or discriminated against.

Definitions & Terminology

It is important in the context of gender identity to understand the differences between the terminology of 'sex' and 'gender':

- 'Sex' tends to refer to biological differences
- 'Gender' tends to refer to cultural or social differences

For the purpose of this policy, we use the word transgender as a term to encompass all varying terms for those whose gender is not the same as, or does not sit comfortably with, the sex they were assigned at birth. Managers, employees and members should respect how an individual chooses to describe themselves and should avoid making assumptions. Using inappropriate language and terminology can cause offence and distress and undermines our efforts to create an inclusive environment.

Equal Opportunities

We are committed to ensuring that everyone has the same great opportunities available to them and to promote a workplace and workout space that is inclusive of people, regardless of their gender identity. To achieve this, we adopt the following approach:

Data Collection & Monitoring

Employees

- We carry out equal opportunities monitoring to enable us to identify under-representation and any potential barriers to inclusion. This helps inform priorities for action and provides a baseline for measuring progress.
- When collecting data as part of our equal opportunities monitoring, we ensure that the disclosure of gender identity among other special categories of personal data is voluntary, and any data shared is stored securely and confidentially.
- Data will be used only to provide statistics for monitoring purposes in accordance with our data protection policy / policy on processing special categories of personal data.
- For HMRC compliance, the collection of gender data within Workday is limited to binary concepts of male or female gender categories, however in recognition of gender diversity and to provide an inclusive approach to equality monitoring we do provide the option to collect additional separate and broader categories of gender identity data on a voluntary basis.

Members

- Data relating to an individual's sex is collected during the new member join journey process for the purpose of providing PIN access to gendered changing rooms within our gyms. This excludes our smaller gyms which provide individual unisex changing facilities.

Recruitment

- We will ensure that all job adverts are clear that job opportunities are open to all who are suitably qualified for the role.
- We understand that the requirement to provide proof of identity to confirm the right to work in the UK and qualifications can be particularly sensitive for transgender employees and applicants whose identification documentation may be in their previous name.
- Where an individual's documentation reveals their previous name and thereby their gender history, this information will be kept confidential and stored securely with the permission of the individual and in accordance with our data protection policy. We ensure that the recruitment, promotion and advancement of all employees will be assessed fairly, and decisions will be based purely on merit and suitability for the role.

Advocating Transgender Equality

We understand that the transition process will be unique to each individual. We are committed to supporting those who have made the decision to transition and upon being made aware by a member, employee, contractor or other contact to the Company that they will be starting or have started the process of transitioning; one main contact of support will be agreed.

Key Principles

- **Support** – Where an individual discloses that they are undergoing or will be undergoing gender reassignment the main support contact will work with the individual to develop a confidential action plan to support the individuals transition process.
- **Respect and dignity** – Assumptions will not be made about someone's gender identity, if a transgender individual chooses not to discuss this with you, respect this.
- **Zero-tolerance** – Transphobic behaviour will not be tolerated. Employees, members or contractors who behave in a discriminative way, will be dealt with appropriately either as a member rule breach, escalation to their respective company or, in the case of an employee, the disciplinary procedure.
- **Complaints** – Whilst we aim to ensure The Gym is a safe and positive environment for all, we do have robust procedures in place to ensure all complaints are taken seriously and support is provided to those who wish to make a formal complaint. Further details of how complaints, particularly serious complaints in relation to how discrimination, bullying and harassment are managed are outlined in the Dignity at The Gym policy.
- **Confidentiality** – Everyone is entitled to be treated as a member of their self-identified gender and has a right to confidentiality about their personal circumstances. Information will not be shared with others, unless there is a specific reason, for example it is required by law and/or we have the written consent from the individual concerned to do so.

Support & Guidance

The below guidance is designed to clearly outline the key considerations to ensuring transgender individuals and those who are transitioning are supported at The Gym Group.

Communication

When informed that an individual is proposing to undergo, is currently undergoing, or has already undertaken a process (or part of a process) of gender reassignment; an initial meeting should be held to discuss the level of

support the individual requires and establish the actions required to ease them through this in the workplace or work-out space.

Employees

- Where an individual is transitioning, the line manager or appointed support contact will arrange a meeting to discuss the level of support required and where necessary implement the employee Transition Action Plan.
- As part of this discussion, it should be agreed whether any information needs to be conveyed to colleagues/clients/members and if so when/how the employee would like this managed.

Members

- When informed directly by a member that they are in the process of transitioning or have transitioned, the Gym Manager will arrange a meeting with them to discuss whether any additional support is required within the gym setting and where necessary implement a Member Transition Plan.
- Where a member has raised this through the Customer Service team, the Customer Service agent will establish with the individual whether further action is required, and if so, will obtain consent from the member before sharing such details with the relevant gym management team for the purpose of arranging a meeting.

Time Off

Employees

We will always aim to support employees who are transitioning and understand that each individual's transition journey will be unique to them and that this is not always a medically defined process. Not everyone will opt for medical interventions, for some their transition may be adjusting the way they dress or the pronouns they use. No matter what a person's journey and preferences are, it is important they are treated with dignity and respect and supported.

This may include discussions around time off, whether that is for appointments or surgery, time off for emotional or mental wellbeing reasons or to prepare themselves for the changes they are making. All absences should be discussed and agreed with the line manager and recorded in line with our policies.

Time off for appointments and/or treatment and surgery should be discussed as part of the Transition Action Plan. Where possible we ask that employees provide advance notice of these appointments.

We understand that the transitioning process can be daunting and draining and that employees may need support or time away from work. To support employees who require time off during their transition we offer:

- Up to 1 week paid leave for emotional support (such as coaching / counselling / emotional wellbeing support sessions)
- An additional 2 to 4 weeks paid leave for medical procedures (dependant on the nature)

Medical procedures may include:

- Electrolysis
- Laser hair removal treatments
- Surgery: time off for surgery will vary depending on the type of surgical interventions required

Any additional time off should be taken in line with existing absence policies and all leave taken to support an individual with their transition will not be used in any absence management procedures.

Changing Personal Details

Employees

- Managers will discuss with employees any systems that will need to be updated and who will be required to update it and when. Some systems changes can take some time to take effect and managers will discuss the timelines in this instance.
- Whilst we will need to retain records that include details of an employee's gender history, these will be stored securely in line with our data retention policy.
- The information will be held electronically in a secure environment that can be accessed only by the individual concerned and the People Team who will be made aware that breaches of confidentiality could be unlawful and result in disciplinary action.
- Where there is a need to retain documentation that highlights someone's gender history; this information will be stored confidentially in line with the requirements of data protection legislation.
- Whilst data relating to someone's gender history will be kept confidential, this data may be shared if required by law or in line with our legal and regulatory obligations.
- There are some limitations on the information and records that can be updated if the employee has not legally changed their name. In these instances, the name change will be recorded as the employees 'preferred name' and will be used wherever reasonably practical.
- For HMRC National Insurance and State Pension purposes, changes to an employee's gender and/or name will only be updated by payroll to HMRC

upon receipt of the employee's formal documentation confirming these changes.

- Furthermore, HMRC currently only accept Male or Female gender categories, therefore for payroll purposes we are restricted to these gender identity options. Individuals are also responsible for notifying HMRC of changes.

Members

- Members who wish to update data held against their membership account, in relation to a name change or the sex they have previously selected when joining the gym, can do so either by contacting the gym management team in the first instance or the Customer Service team.

Bathroom & Changing Facilities

****Currently under review following the UK Supreme Court ruling April 2025***

We will always support transgender employees, members, self-employed PT's, contractors and visitors of The Gym Group to use the toilets and changing facilities that they feel are most suited to them. If an individual is transitioning it should be agreed with them when they wish to start using the facility appropriate to their acquired gender.

We recognise that for some, the use of the single occupancy unisex/accessible facilities may offer a suitable option for those who are transitioning, however whilst the use of these facilities may be discussed with the individual, at no point should they be pressurised to use these facilities or should it be seen as a long-term solution.

Due to the open nature of our gym facilities, we recognise that others may raise concerns regarding the above points. Any concerns raised will be dealt with promptly and sensitively.

In the above instance, managers will assist in finding a solution that ensures everyone feels welcome and supported.

Names & Pronouns

Mis-gendering is the intentional or unintentional reference to a person or use of language to describe a person that doesn't align with their affirmed gender. Referring to someone by their previous name is an example of where this can occur and can have a negative impact on a transgender / transitioning individual. Pronouns are words we use to refer to people's gender, for example he/she, his/her, some people prefer gender neutral language like they/their or ze/zir. We will ensure the preferred pronouns are used when addressing that individual.

To avoid making assumptions about someone's preferred pronoun, where appropriate you should ask an individual their preference. There is also an option for employees to add their preferred pronoun in Workday to ensure unnecessary assumptions are made. Consistently addressing a transgender

person by their previous name and/or an inappropriate pronoun may be regarded as harassment as defined in our Dignity at The Gym Group policy.

Related Policies

The following policies/documents should be read in addition to this document:

- Transitioning Action Plan
- Dignity at The Gym policy
- Diversity, Inclusion & Equality Manifesto
- Diversity & Inclusion policy
- Grievance procedure