

Testwood School Transgender Policy

Key Responsibility	DM
Last Review:	January 2026
Next Review:	January 2027

Revision History

Version	Date	Amendments	Initials
1.0	10.01.23		DM
1.1	09.01.24	Revision dates updated	JB
1.2	06.01.25	Review dates updated	DM
1.3	16.12.25	Review Dates updated. Key sections revised and re-written to improve clarity. Two sections have been added (7. Safeguarding and Confidentiality and 18.Governance & Review).	DM

*Appendices follow on from policy

1. Purpose

The purpose of this policy is to explain Testwood School's approach to gender identity by:

- ensuring teachers are dealing with transgender matters inclusively and sensitively
- providing an inclusive environment for any transgender student
- ensuring all students are aware of and educated on issues of gender identity

2. Gender Identity

Gender is a spectrum, which is not limited to male or female – but can span anywhere between these two binary points. A transgender person feels that their sex does not match up with the way they feel internally about their gender identity. A female to male (FTM, or trans male) person will have been assigned as female at birth, but will identify as male; a male to female (MTF, or trans female) person will have been assigned as male at birth, but will identify as female.

The word transgender, often shortened to trans, is a term used to describe people who identify as a different gender to that which they were assigned at birth. However, it is also an umbrella term which can include people who do not feel exclusively male or female (non-binary). Gender can be fluid, and some people that do not relate to their assigned gender may never transition. Some people choose to use alternative pronouns. For example, someone who is gender fluid but chooses to keep their sex as male, may prefer to be known by 'she/her/hers' pronouns. Others may prefer to be known by 'they/them/theirs'.

Gender Dysphoria is a clinical condition that can present from a very early age and can only be diagnosed by a medical expert. A person diagnosed with Gender Dysphoria may require treatment, e.g. hormone blockers to delay puberty, before being prescribed hormones of their desired gender. A transgender person may live their life without being or needing to be diagnosed as having Gender Dysphoria.

Diagnosis and treatment for young people is available from specialist Gender Identity Clinics (GICs) – which are available in many locations across the UK. It must be understood that some people with Gender Dysphoria may not want any treatment. Some may choose to be known by a different name or to wear different clothes. However, most young transgender people (and their families) will need support as they grow up and develop.

3. Legislation

Data Protection Act 2018/General Data Protection Regulation – GDPR

Information about a person's transgender status is considered 'sensitive personal data' and is subject to tighter controls than other personal data. Explicit consent is required before it can be processed. Personal data must be looked after properly following the data protection principles, which include ensuring personal data is accurate, secure and processed fairly and lawfully.

The Data Protection Act sits alongside the GDPR, and tailors how the GDPR applies in the UK. The GDPR applies to the processing of personal data; all IT records of the individual's personal life and medical history ("sensitive personal data") must be held in line with the GDPR, including password-protection, and should be "kept for no longer than is absolutely necessary". A named person who needs to access this private information, must still ask permission of the individual concerned, unless there is an emergency situation and the individual is unable to give permission. Employers should note that an individual who suffers damage by reason of any contravention by a data controller of any of the requirements of the GDPR is entitled to compensation from the data controller for that damage.

4. The Human Rights Act 1998

The following Articles from The Human Rights Act 1998 support the rights and needs of transgender people to live their lives in their true gender:

- Article 8: right to respect private life and family life.
- Article 10: freedom of expression.
- Article 14: the prohibition of discrimination.

5. The Gender Recognition Act 2004

The Gender Recognition Act 2004 is mainly concerned with the process by which a person can get a Gender Recognition Certificate, and correct their original birth certificate to match their true gender. This can only occur after a person reaches 18 years of age but is something that many younger people may aspire to.

6. Equality Act 2010

The Equality Act 2010 ensures legal protection against discrimination, harassment and victimisation for everyone under the nine protected characteristics defined in the Act, one of which is Gender Reassignment. Part 6 of the Equality Act 2010 makes it clear that the Act specifically refers to schools and young people.

The Equality Act 2010 (2:1:7) states that:

“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.”

The Act applies to employment, education and a range of other areas where discrimination may take place. In order to be protected under the Act, a student will not necessarily have to be undergoing a medical procedure to change their sex, but they must be taking steps to live in the opposite gender, or be proposing to do so.

The legislation states that a school must not discriminate against a student because of their transgender status. Discrimination can be direct or indirect. Indirect discrimination occurs when a provision, criterion or practice applies to everyone but puts a person with a particular protected characteristic at a particular disadvantage, and it cannot be justified as a proportionate means of meeting a legitimate aim. An example might be an inflexible school uniform rule which offers no “unisex” options such as trousers for girls, and which would therefore create a particular difficulty for a FTM student.

7. Safeguarding and Confidentiality

Testwood School recognises that supporting students who identify as transgender requires careful consideration of safeguarding, confidentiality, and the welfare of all students. Information relating to a student’s gender identity is treated as sensitive personal data and will be handled in accordance with the Data Protection Act 2018 and UK GDPR. Information will only be shared with staff on a need-to-know basis and with the student’s knowledge wherever possible.

However, confidentiality cannot be absolute. Where there is a concern that a student may be at risk of harm, or where safeguarding thresholds are met, information will be shared with the Designated Safeguarding Lead (DSL) and, where appropriate, external agencies, in line with the school’s Safeguarding and Child Protection Policy.

All decisions relating to transgender students will prioritise the student’s welfare and safety, while also taking into account the rights and needs of other students. The DSL will be involved in complex or sensitive cases, including where there is disagreement between the student, parents or carers, and the school.

8. School Attendance

Testwood School will make reasonable adjustments to accommodate absence requests for treatment and support from external sources in line with their absence policy. Sensitive care will be taken when recording the reason for absence.

9. Transphobia and Bullying

Testwood School has a robust anti-bullying policy. In line with this policy, transphobic incidents will be recorded and dealt with in the same manner as other incidents that are motivated by prejudice, e.g. racist or homophobic incidents.

10. Training

In order to ensure all staff have the skills to deal with transgender issues, Testwood School will hold training sessions on topics such as:

- Safeguarding
- Confidentiality
- Gender Identity
- Tackling transphobia
- Relevant legislation

All topics will be covered during the Testwood School INSET programme and will be revisited annually.

11. The Curriculum

Issues connected to gender identity will be visited for all students during curriculum time during the PSHE programme. These issues will also be touched upon during other subjects.

12. Physical Education and School Sport

Testwood School recognises the importance of Physical Education and sport for the physical, social, and emotional wellbeing of all students. Transgender students have the same entitlement to participate in Physical Education as other students.

Participation in PE and sport will be considered on a case-by-case basis, with decisions informed by:

- the student's age, stage of development, and individual circumstances
- health and safety considerations
- the nature of the activity, including levels of contact or physical risk
- fairness and inclusion for all participants

Where appropriate, reasonable adjustments or alternative arrangements may be made to enable participation while maintaining safety and fairness. Decisions will be taken in

consultation with the student and parents or carers, unless there are safeguarding reasons not to do so.

Final decisions regarding participation will be made by the school, led by senior staff, with advice from the PE department and the DSL where necessary.

13. Changing/Toilet Facilities

Testwood School is committed to ensuring that all students can access toilet and changing facilities in a way that is safe, dignified, and respects privacy.

Requests from transgender students regarding access to toilets and changing rooms will be considered on a case-by-case basis, taking into account:

- the student's expressed needs and wishes
- safeguarding considerations
- the age and maturity of the student
- the rights, privacy, and comfort of other students
- the practical supervision arrangements available

The school will seek to make reasonable adjustments where appropriate, with the aim of enabling inclusion while maintaining a safe environment for all. This may include access to facilities aligned with a student's gender identity, the use of private or individual facilities, or other agreed arrangements.

Any student, regardless of gender identity, who expresses a need or preference for increased privacy will be supported where reasonably possible. No student will be required to use separate facilities solely because they are transgender.

Decisions will be made sensitively and reviewed as circumstances change, in consultation with the student and, where appropriate, parents or carers.

14. School Uniform

Transgender students will be expected to follow the School Uniform Policy, which covers uniform, make-up and jewellery. There is a generally broad range of uniform available for all genders (i.e. girls and boys can wear trousers and skirts, and all students must wear a blazer, shirt and tie).

15. Name Changing and Exam Certification

Where a student requests the use of a preferred name, Testwood School will consider and support this request wherever reasonably possible. Preferred names may be used on internal systems, class registers, reports, and correspondence, subject to data protection and examination requirements.

Legal names will continue to be used where required for official records, including examination entries linked to a Unique Pupil Number (UPN) or Unique Learner Number (ULN).

Any changes will be managed carefully to ensure accuracy, confidentiality, and clarity for staff and families. The school will work with students and parents or carers to agree an appropriate approach in advance of examination entry deadlines.

16. Medical Matters and External Support

Testwood School acknowledges that some transgender or gender-questioning students may experience distress related to their gender identity. The school's role is to provide pastoral support and an inclusive educational environment.

Medical assessment, diagnosis, or treatment, including decisions relating to hormones or puberty blockers, are not within the remit of the school and remain the responsibility of healthcare professionals and families.

The school will support students who need to attend external appointments and will record absences sensitively in line with the Attendance Policy.

17. School Visits

Transgender students will not be excluded from school visits or residential experiences because of their gender identity.

When planning visits, the school will consider any additional needs in advance, including accommodation, supervision, and privacy. Sleeping arrangements will be risk assessed on a case-by-case basis, with the aim of ensuring safety, dignity, and inclusion.

For visits abroad, the school will consider relevant local laws and cultural factors as part of the risk assessment process and will take reasonable steps to ensure the student's safety.

18. Governance and Review

Responsibility for the implementation of this policy rests with the Headteacher and Senior Leadership Team.

This policy should be read in conjunction with:

- Safeguarding and Child Protection Policy
- Anti-Bullying Policy
- Equality Policy
- Complaints Policy

The policy will be reviewed annually, or sooner if there are significant changes in legislation, statutory guidance, or local authority advice.

This policy has been checked and is believed to be consistent with the stated vision and values of Testwood School.

Appendix 1

GLOSSARY OF TERMS

AFAB – assigned female at birth.

AMAB – Assigned male at birth.

Binary/Non-binary – Refers to the gender spectrum: Binary refers to the two ends of the spectrum – male and female; non-binary can be used to describe someone who identifies not solely with either of these genders, but somewhere in between.

Binding – a FTM adolescent that is developing breasts may strap down their chest so that it is less obvious. This can be hot, uncomfortable and restrictive but very important to their psychological and emotional wellbeing. It might make certain PE lessons difficult for them to participate in and could sometimes lead to breathing difficulties, skeletal problems and fainting.

Cisgender – Someone who identifies completely with their assigned gender at birth (which also corresponds to their sex).

FTM – Female to Male, a person that was assigned as female at birth but came to feel that their true gender is actually male.

Gender – the way that a person feels about themselves in relation to their physical and mental self; the basis of their identifying as male, or female, or neither, or either, or somewhere else on the spectrum.

Gender Dysphoria – the medical condition that describes the symptoms of being transgender.

Gender Fluid – Someone who identifies as gender fluid will identify with a different gender on a varying basis. They may feel more feminine some days and more masculine on other days; or feel that neither male nor female describes them fully.

Gender Identity – the gender that a person truly feels they are inside.

Gender Recognition Certificate – an official document presented by a Gender Recognition Panel that enables all official documents and records (including birth certificate) to be amended to the true gender of the individual thereby providing full legal recognition.

Gender Spectrum – the continuum between the two binary points of male or female. This is vast and many people identify at different points.

Hormone Suppressors/Puberty Blockers – drugs that are given in order to delay the process of puberty. These can be prescribed before a child is old enough to start taking hormones such as oestrogen or testosterone.

MTF – Male to Female, a person that was assigned as male at birth but came to feel that their true gender is actually female.

Packing – a FTM person may wear a prosthetic item in their pants that will give a bulge in their trousers so as to appear more male.

Sex – the way a person's body appears, sometimes wrongly, to indicate their gender.

Transgender – a person that feels the assigned gender and sex at birth conflicts with their true gender.

Trans Female – Someone who was assigned male at birth but identifies as female.

Trans Male – Someone who was assigned female at birth but identifies as male.

Transition – The process of changing gender. This may be by having surgery to change sex organs, or by taking hormones.

Tucking – AMTF person may tuck (and sometimes tape) their genitals between their legs so that it does not show at the front.