

SALISBURY LTC TRANSGENDER AND NON-BINARY INDIVIDUALS POLICY

Approved and adopted by the Committee of Salisbury LTC on: 09/02/2026

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INTRODUCTION

1. This is Salisbury LTC's Transgender and Non-Binary Individuals Policy ("Policy"). A Player assigned male sex at birth will be eligible to compete in the men's competition category (and as the man in a mixed doubles team), and a Player assigned female sex at birth will be eligible to compete in the women's competition category (and as the woman in a mixed-doubles team). This Policy sets out the eligibility of a transgender or non-binary Player to compete in the women's competition category and/or the men's competition category and/or any mixed doubles competition.

CONTEXT

2. Salisbury LTC has developed this Policy in the context of the Sports Councils' Equality Group's 'Guidance for Transgender Inclusion in Domestic Sport'. This Policy seeks to balance the conflicting rights and interests of various groups, in particular cisgender women and transgender women, and is informed by the law and available scientific evidence. Salisbury LTC reserves the right to amend this Policy from time to time.
3. For the purposes of the Equality Act 2010, tennis is a gender-affected activity of a competitive nature where the physical strength, stamina or physique of average women puts them at a disadvantage compared to average men. Accordingly, the law permits sports' governing bodies (1) to organise separate sporting competitions for men and women, and (2) to impose restrictions on the eligibility of transgender and non-binary Players to participate in sport if such restrictions are necessary to secure (A) the safety of competitors, and/or (B) fair competition.
4. The science is clear that there is a significant sex difference in sport performance between biological men and biological women, and the sex performance difference is driven primarily by higher circulating testosterone in biological men. That significant sex difference in sport performance is the reason a separate women's competition category is necessary. In tennis, the sex performance difference arises from – among other things – differences in strength, power, and endurance, and also from anatomical differences between men and women (men on average have larger musculoskeletal frames including longer limbs to lever, generating greater power of shot). While gender-affirming hormone treatment for transgender women (i.e. suppression of high circulating testosterone levels in the men's range to levels in the women's range) reduces to some degree muscle mass and strength and other physical attributes that contribute to sport performance, the significant sex difference is not eliminated (and residual performance advantages of men's biology remain).

AIM OF THE POLICY

5. This Policy is intended to facilitate the provision of competitive opportunities for transgender and non-binary Players in a safe and supportive environment that is free from harassment and abuse, while also seeking to maintain fair and meaningful competition conditions for Players participating in Non-Specified Competitions. If circumstances arise in the application of this Policy that Salisbury LTC (in its absolute discretion) determines either are not foreseen in this Policy or give rise to exceptional unfairness, then Salisbury LTC may (in its absolute discretion) address them in a manner that protects and advances these imperatives.

SCOPE AND EFFECTIVE DATE

6. This Policy will come into full force and effect on the date given on the title page (the "Effective Date"). This Policy will apply both to cases arising prior to the Effective Date and to cases arising on or after the Effective Date.
7. This Policy primarily concerns eligibility to compete in Salisbury LTC Non-Specified Competitions.

8. For the avoidance of doubt, in Salisbury LTC Non-specified Competition between boys and girls in 8U, 9U and 10U events, this Policy applies to all competition age groups.

DEFINITIONS AND USE OF LANGUAGE

9. This Policy distinguishes between biological sex and gender identity, and between biological women and biological men, solely to ensure that the Policy is clear and has its intended effect. There is no intent to disrespect or question the gender identity or the dignity of any individual. In this Policy:
 - 9.1 **“biological sex”** refers to an individual’s status as a man or a woman based on biological (in particular chromosomal, gonadal, and hormonal) sex characteristics, which are dichotomous;
 - 9.2 **“gender identity”** refers to an individual’s self-identified gender.
This may be the same as or different to the individual’s biological sex;
 - 9.3 **“transgender”** refers to an individual whose gender identity is different from their sex assigned at birth (whether or not they have commenced and/or undergone any form of medical transition);
 - 9.4 **“transgender woman”** refers to an individual who was assigned male sex at birth and has a female gender identity;
 - 9.5 **“cisgender woman”** refers to an individual who was assigned female sex at birth and has a female gender identity;
 - 9.6 **“transgender man”** refers to an individual who was assigned female sex at birth and has a male gender identity;
 - 9.7 **“cisgender man”** refers to an individual who was assigned male sex at birth and has a male gender identity;
 - 9.8 **“non-binary”** refers to individuals whose gender identity does not sit comfortably as ‘male’ or ‘female’. Non-binary identities are varied. Some individuals identify with some aspects of male and/or female identities, and other individuals reject binary identities entirely;
 - 9.9 **“Organiser”** means the person or persons administering and/or organising the relevant Non-Specified Competition; and
 - 9.10 **“Player”** means an individual player of the Game.
10. This Policy defines **“Non-Specified Competition”** as any competition that:
 - 10.1 is not “Specified Competition” (as defined by the LTA) AND the Organiser of such competition is (a) an SALISBURY LTC Registered Organisation, (b) an SALISBURY LTC Licensed Official, or (c) an SALISBURY LTC Accredited Coach, or
 - 10.2 is a Local Tennis League.
11. Other capitalised terms used in this Policy will have the meanings given to them in Appendix One, and the explanatory notes in the Policy will be used to interpret the Policy.

ELIGIBILITY TO COMPETE IN NON-SPECIFIED COMPETITIONS

12. Paragraph 14 sets out who is eligible to compete (i.e. subject to this Policy, who may choose to compete) in the women’s competition category of Non-Specified Competition, and paragraph 15 sets out who is eligible to compete (i.e. subject to this Policy, who may choose to compete) in the men’s competition category of Non-Specified Competition. An individual who is eligible to compete in both the women’s competition category and the men’s competition category of Non-Specified Competition may choose in which category they wish to compete.

13. In all cases, eligibility for the women's and/or men's competition category of Non-Specified Competition is subject to compliance with the requirements of this Policy, as applicable, including the process for SALISBURY LTC approval of eligibility set out at paragraphs 17, 18 and 19.
 14. The following Players are eligible to compete in the women's competition category (and as the woman in a mixed doubles team) in Non-Specified Competitions:
 - 14.1 cisgender women.
 - 14.2 transgender men who have never commenced gender-affirming hormone treatment (i.e. exogenous administration of testosterone).
 - 14.3 non-binary individuals who were assigned female sex at birth and have never commenced gender-affirming hormone treatment (i.e. exogenous administration of testosterone).
- Explanatory note:** For the avoidance of doubt, transgender women and non-binary individuals who were assigned male sex at birth (in each case irrespective of any gender-affirming hormone treatment commenced, i.e. suppression of testosterone) are ineligible to compete in the women's competition category (and as the woman in a mixed doubles team) in Non-Specified Competitions.
15. The following Players are eligible to compete in the men's competition category (and as the man in a mixed doubles team) in Non-Specified Competitions:
 - 15.1 cisgender men.
 - 15.2 transgender men (irrespective of any gender-affirming hormone treatment commenced, i.e. exogenous administration of testosterone).
 - 15.3 transgender women (irrespective of any gender-affirming hormone treatment commenced, i.e. suppression of testosterone).
 - 15.4 non-binary individuals who were assigned female sex at birth (irrespective of any gender-affirming hormone treatment commenced, i.e. exogenous administration of testosterone).
 - 15.5 non-binary individuals who were assigned male sex at birth (irrespective of any gender-affirming hormone treatment commenced, i.e. suppression of testosterone).

PROCESS TO OBTAIN SALISBURY LTC APPROVAL OF ELIGIBILITY TO COMPETE IN NON-SPECIFIED COMPETITIONS

16. Paragraph 17 sets out the process by which a transgender or non-binary Player may – where necessary – obtain SALISBURY LTC approval of eligibility to compete in their chosen competition category in Non-Specified Competitions. Paragraph 18 sets out the requirements and process by which a transgender man or a non-binary Player assigned female sex at birth (in either case, who has never commenced gender-affirming hormone treatment (i.e. exogenous administration of testosterone)) may apply for SALISBURY LTC approval of eligibility to compete in the women's (or men's) competition category in Non-Specified Competitions after having previously competed in the men's (or women's) competition category in Non-Specified Competitions.
17. Anyone who wishes to compete in Non-Specified Competition may be asked by the Organiser to specify their gender identity and their sex assigned at birth. Subject always to the eligibility requirements of paragraphs 14, 15 and 18:
 - 17.1 If a transgender woman or a non-binary individual assigned male sex at birth wishes to compete in the men's competition category, they may do so without further notice to Salisbury LTC.
 - 17.2 If a transgender man or a non-binary individual assigned female sex at birth wishes to compete in the men's competition category, they may do so without further notice to Salisbury LTC.

- 17.3 If a transgender man or a non-binary individual assigned female sex at birth wishes to compete in the women's competition category, they may be asked by the Organiser whether or not they have ever commenced gender-affirming hormone treatment (i.e. exogenous administration of testosterone). If they state that they have not, they may be asked for evidence (i.e., medical records) to demonstrate that to the satisfaction of Salisbury LTC (in its absolute discretion). Salisbury LTC will review and determine the application in accordance with paragraph 19, below.
18. If a transgender man or a non-binary individual assigned female sex at birth is (and remains) eligible to compete in both the men's and women's competition categories and, having competed (whether before, on or after the Effective Date) in one of those categories (referred to as the 'first category'), subsequently wishes to compete in the other category (referred to as the 'second category'), the Player will not be eligible to compete again in the first category for a period of two years from the date that they last competed in the second category. Such Player must apply, and Salisbury LTC will review and determine the application in accordance with paragraph 19, below. For the avoidance of any doubt, where a transgender man or non-binary individual assigned female sex at birth is (or has been) playing in the men's competition category and wishes to change their competition category to the women's competition category, then the process set out in paragraphs 17.3 and 19 applies (in addition to the ineligibility period of two years).
19. For any application made under paragraph 17.3 or 18, above:
- 19.1 SALISBURY LTC will review the application and may request (and the Player must provide) information or documents to demonstrate the Player's satisfaction of the applicable eligibility conditions for the competition category in which the Player wishes to compete. The Player is responsible for ensuring that the information provided is accurate, complete and not misleading, and that nothing relevant to Salisbury LTC's assessment of the application is withheld.
- 19.2 The application (and any required information and documents) must be provided to Salisbury LTC at least fifteen business days before the entry deadline for the first Non-Specified Competition in the competition category in which the Player wishes to compete.
- 19.3 Unless and until the application is granted by Salisbury LTC (in its absolute discretion), the applicant Player will not be eligible to compete in the competition category in which they wish to compete.
20. The eligibility requirements for transgender and non-binary Players to compete in Salisbury LTC Non-Specified Competitions operate without prejudice to the other requirements in Salisbury LTC rules or policies that are applicable to all Players. In particular, nothing in this Policy permits, excuses or justifies non-compliance with any of the requirements of Salisbury LTC's anti-doping regulations (forming part of Salisbury LTC Disciplinary Code), including the requirement to obtain a therapeutic use exemption before using any substance – including testosterone or testosterone-suppressing substances (such as but not limited to spironolactone or GnRH agonists) – that is included on the World Anti-Doping Agency's list of prohibited substances, as in force from time to time.

ELIGIBILITY TO COMPETE IN NON-SPECIFIED COMPETITIONS

21. In a Non-Specified Competition where the Organiser is Salisbury LTC:
- 21.1 if separate sex competition is not provided (for example, in some Local Tennis Leagues/Open Ladder format), transgender and non-binary Players are eligible to compete.
22. In a Non-Specified Competition where the Organiser is not Salisbury LTC:
- 22.1 the eligibility of transgender and non-binary Players to compete in the men's competition category and/or the women's competition category and/or any mixed doubles competition is, subject to paragraph 22.2, entirely at the discretion of the Organiser;

- 22.2 the Organiser, if organising both men's and women's competition categories as part of the same competition, must ensure that Players of all gender identities are eligible to participate in (at least) one competition category;

Explanatory note: For the avoidance of doubt, an Organiser must not (1) structure eligibility criteria so as to exclude a Player from all competition categories (but this does not require an Organiser to organise both a men's competition category and a women's competition category for any particular competition), or (2) impose restrictions on the eligibility of transgender men or non-binary individuals assigned female sex at birth to compete in the men's competition category (because such restrictions would be not be necessary to ensure fair competition or safety and would therefore be unlawful).

- 22.3 the Organiser may (in its absolute discretion) rename the 'men's' competition category as an 'open' category; and

[[**Explanatory note:** Non-Specified Competitions are organised into 'men's' and 'women's' competition categories for historical, regulatory, and administrative reasons. An Organiser for a Non-Specified Competition may choose to rename the 'men's' competition category as an 'open' category (because some transgender and non-binary individuals consider that descriptor more inclusive).]

- 22.4 any decision regarding eligibility criteria and/or player eligibility pursuant to this paragraph 22 that is made by an Organiser that is not Salisbury LTC is entirely a matter for that Organiser (and not a matter for Salisbury LTC).

ELIGIBILITY FOR OTHER SALISBURY LTC PRODUCTS AND PROGRAMMES

23. Subject to and/or as permitted by any applicable law and/or other SALISBURY LTC policy (and aside from participation in Non-Specified Competitions or as otherwise provided for in this Policy), consistent with their gender identity:

- 23.1 transgender women and non-binary individuals will be eligible to use, access, and participate in (as applicable) all other SALISBURY LTC products, programmes, services and grants which are targeted towards or allocated for women where they are provided or delivered by SALISBURY LTC or where such SALISBURY LTC products or programmes are delivered by an SALISBURY LTC Registered Organisation or SALISBURY LTC Accredited Coach at an SALISBURY LTC Registered Venue.
- 23.2 transgender men and non-binary individuals will be eligible to use, access, and participate in (as applicable) all other SALISBURY LTC products, programmes, services and grants which are targeted towards or allocated for men where they are provided or delivered by SALISBURY LTC or where such SALISBURY LTC products or programmes are delivered by an SALISBURY LTC Registered Organisation or SALISBURY LTC Accredited Coach at an SALISBURY LTC Registered Venue.

Explanatory note: Gender identity should be no barrier to participation in other products or programmes provided or delivered by SALISBURY LTC. Salisbury LTC encourages individuals of all gender identities to become involved in tennis coaching, officiating, administration and/or other activities.

USE OF CHANGING FACILITIES

24. Where Non-Specified Competitions or other events or activities are held at Salisbury LTC:

- 24.1 appropriate provision of changing spaces and facilities will be made available to all individuals, including transgender and non-binary individuals, in a manner that respects their privacy and dignity;
 - 24.2 SALISBURY LTC will restrict access to any communal women's changing spaces and facilities to individuals assigned female sex at birth; and
 - 24.3 SALISBURY LTC will restrict access to any communal men's changing spaces and facilities to individuals assigned male sex at birth.
25. Where SALISBURY LTC Non-Specified Competitions or other events or activities are held at a venue other than Salisbury LTC the controller of the venue will determine its policy on access to any communal women's and communal men's changing spaces and facilities (including the appropriate provision of changing spaces and facilities for transgender and non-binary individuals).

[Explanatory note: All users of changing spaces and facilities should feel comfortable and secure, and Salisbury LTC recognises that some users may not feel so in the presence of individuals of the opposite biological sex and/ or gender identity.]

MONITORING AND ENFORCEMENT

26. In addition to the general power to monitor and investigate Player eligibility pursuant to this policy, Salisbury LTC may investigate at any time:

- 26.1 whether a Player who has not established their eligibility to compete in SALISBURY LTC Non-Specified Competitions (in accordance with this Policy) should be required to do so;
- 26.2 whether (because of a subsequent change in circumstances, subsequent learning or experience, or otherwise) it is necessary to require a Player who has previously been determined to satisfy the eligibility conditions to provide further information and documents in order to determine whether they did satisfy and/or continue to satisfy those conditions; and/or
- 26.3 any circumstances that indicate potential breach of or non-compliance by an individual with this Policy; and in such cases the individual in question must cooperate promptly, fully and in good faith with that investigation.

[Explanatory note: For the avoidance of doubt, it will be a breach of this Policy for a transgender woman or non-binary player assigned male sex at birth to enter and/or compete in the women's competition category in a Non-Specified Competition.]

27. Only Salisbury LTC may initiate an investigation further to paragraph 26, and it may only do so in good faith and on reasonable grounds. In appropriate circumstances the matter may, in Salisbury LTC's absolute discretion, be resolved by Salisbury LTC.
28. Where necessary to safeguard the fairness of Salisbury LTC Non-Specified Competitions, Salisbury LTC may provisionally suspend a Player from competing in some or all Salisbury Non-Specified Competitions pending completion of an investigation and resolution of the matter. In such cases all reasonable efforts will be used to complete the investigation as expeditiously as possible.

GENERAL OBLIGATIONS

29 Each Participant Player and every other person who brings themselves under the authority of Salisbury LTC by providing information to Salisbury LTC for consideration under this Policy and/or by participating, competing or seeking to compete in SALISBURY LTC Sanctioned Competition:

29.1 is bound by and must comply in full with this Policy;

- 29.2 must cooperate promptly, fully and in good faith with Salisbury LTC in the discharge of its responsibilities under this Policy, including providing Salisbury LTC with all of the information it requests to assess/monitor their compliance with to this Policy;
- 29.3 must ensure that any information they provide to Salisbury LTC for consideration under this Policy is accurate, complete and not misleading; and
- 29.4 must not provide any information in bad faith, to harass, stigmatise or otherwise injure another person, or for any other improper purpose.
- 30 The dignity of all Players must be respected at all times. Players must not be stigmatised or discriminated against on the grounds of their gender identity. In particular (but without limitation), persecution or campaigns against Players simply on the basis that their appearance does not conform to gender stereotypes are unacceptable. Any such conduct may be considered misconduct.
- 31 A Player may revoke at any time, with or without giving reasons, the consent that they have granted in accordance with this policy. In that event, the Player will (where relevant) be deemed to have withdrawn any claim to satisfy the eligibility conditions for transgender or non-binary players set out in this Policy, which might result in the Player being ineligible to compete in Non-Specified Competition.

CONFIDENTIALITY

33. All cases arising under this Policy, and in particular all Player information provided to Salisbury LTC under this Policy, will be maintained in strict confidence at all times. All medical information and data relating to a Player will be treated as sensitive personal information and Salisbury LTC will ensure that it is processed as such in accordance with applicable data protection and privacy laws. Such information will not be used for any purpose not contemplated in this Policy, and will not be disclosed to any third party save (1) as is strictly necessary for the effective application and enforcement of this Policy; or (2) as is required by applicable law.
34. Salisbury LTC will not comment publicly on any case arising under this Policy except in response to public comments attributed to the individual or the individual's representatives. In appropriate circumstances and at Salisbury LTC's discretion, Salisbury LTC will consult with a Player on whether and if so how to communicate publicly about the Player's eligibility status.

LIMITATION OF LIABILITY

35. In no circumstances will Salisbury LTC or any of Salisbury representatives or other persons involved in the administration of this Policy be liable in any way in relation to acts done or omitted to be done in good faith in connection with the administration of this Policy.

APPENDIX A

1. The capitalised terms used in this Policy will have the following meanings:

- 1.1 **“Local Tennis League”** means a box league competition organised and/or facilitated by a member of Salisbury LTC Group, where Players of a similar level are placed into local groups, known as a local tennis league, to self-arrange matches.
- 1.2 **“SALISBURY LTC Competition Regulations”** means the competition regulations of Salisbury LTC, as amended from time to time