

Paddle UK Transgender Competition Policy

1. Introduction:

- 1.1. Paddle UK¹ (“we” or “us”) is the recognised national governing body (NGB) for paddlesport² in the United Kingdom (UK). Under current UK legislation, paddlesport may be regulated by Paddle UK in respect of the participation of a transgender person.
- 1.2. We are committed to fairness, equity and promoting diversity and inclusion in all we do. We are therefore committed to ensuring that the sport is accessible to all who wish to participate and that individuals are treated fairly.
- 1.3. This Policy has been produced specifically to create a clear framework for transgender participation in competitive paddlesports aligned to the principles of fairness, equity and inclusion, and the Paddle UK Equality Policy.
- 1.4. This Policy does not apply to transgender inclusion in non-competitive participation. For further information and guidance related to non-competitive participation please see the resources [page on our website](#). However, for the avoidance of doubt, transphobia of any kind will not be tolerated in either competitive or non-competitive paddlesports. If any employee, member, paddler, volunteer or official believes they have suffered or witnessed any instances of Transphobia, they can raise their concerns via email to equality@paddleuk.org.uk. Referrals will be treated in the strictest confidence and investigated as appropriate.
- 1.5. Paddlesport is a gender-affected sport where the physical strength, stamina or physique of average persons of one gender may put them at an advantage or disadvantage compared with the average persons of the other gender as competitors. Our aim, as far as is possible, is to balance the rights of transgender people to paddle in their affirmed gender without disproportionately disadvantaging them, or other participants, and whilst protecting the integrity and fairness of the sport.
- 1.6. We recognise that there may be concerns regarding the fairness and integrity of competition especially with regard to transgender women (men who have transitioned to become women) participating in female only competition. This Policy is designed to address this issue as far as is possible in the light of current scientific knowledge by recognising the impact that hormonal treatment can have on a person.
- 1.7. In writing this Policy, the following guidance and legislation have been considered:
 - 1.7.1. Equality Act 2010
 - 1.7.2. IOC Statement of the Stockholm Consensus on Sex Reassignment in Sport (Nov 2015)
 - 1.7.3. IOC Framework on fairness, inclusion and non-discrimination on the basis of gender identity and sex variations (2021)
 - 1.7.4. Data Protection Act 2018

¹ Paddle UK is a trading name of British Canoeing which is a Company registered at Companies House with the registered number 01525484.

² Paddlesport refers to any craft propelled by a paddle in or on which the paddler faces in the direction of travel but excluding craft, such as dragon boats, for which Paddle UK is not recognised as a national governing body by the Sports Councils.

1.7.5. Gender Recognition Act 2004

1.7.6. The Sports Councils Equality Group's Guidance for Transgender Inclusion in Domestic Sport (2021)

2. Defined terms:

- 2.1. **Affirmed gender:** means the gender that the person has transitioned to as opposed to that which is assigned at birth.
- 2.2. **Mixed or mixed team category:** refers to a category in which there is a set representation of athletes competing in the male or female categories (for example, two male athletes and two female athletes on a team).
- 2.3. **Open category:** refers to a category in which athletes are able to compete with no gender or sex restrictions.
- 2.4. **Transgender person:** sometimes also referred to as trans, this is an umbrella term to describe people whose gender is not the same as, or does not sit comfortably with, the sex they were assigned at birth. Trans people may describe themselves using one or more of a wide variety of terms, including (but not limited to) transgender, transsexual, gender-queer (GQ), gender-fluid, non-binary, gender-variant, among others (Stonewall).
- 2.5. **Transphobia:** means discriminatory, abusive, or negative language and behaviour that is directed towards anyone who comes under the umbrella term of transgender. In addition, it may be towards a transgender person's friend or supporter, or anyone that may be perceived to be a transgender person (whether they are a transgender person or not). The behaviour may include a reluctance or refusal to provide access to services to the same extent as that provided for a non-transgender person.

3. Application of this Policy:

- 3.1. This Policy applies to **Domestic Competition**. Domestic Competition is defined as any event or competition sanctioned by a Paddle UK Discipline Committee³. A transgender person wishing to participate in Domestic Competition must meet the criteria set out in Clause 4 of this Policy.
- 3.2. This Policy also applies to a transgender person seeking eligibility and selection to represent Great Britain or England in **International Competitions** or who seek to be entered into international competitions by Paddle UK ("International Competition").
- 3.3. Where a competition is neither Domestic Competition nor International Competition, a transgender person is permitted to self-identify once they have satisfied the requirements outlined in Appendix 1.

³ Paddle UK has a committee structure across eight Disciplines, who are responsible for the delivery of sanctioned competitions and events within their Disciplines. These Disciplines are: Sprint, Slalom, Marathon, Canoe Polo, Rafting, Wild water, Surf Kayak, and Freestyle.

3.4. This Policy does not apply to non-competitive or closed events (such as club events, with no external entries or competitors), training or friendly, informal paddling in which any person, including transgender people, can participate fully without any restriction.

4. Eligibility for Domestic Competition

4.1. A transgender person seeking to compete in Domestic Competition must meet the requirements set out in this Clause 4 as well as following the application process detailed in Clause 7 of this Policy.

4.1.1. **Men, or those competing in the male category:** Any transgender man or boy (female-to-male transgender person) may compete in any male, Open or Mixed category of Domestic Competition. There is no perceived unfair physical advantage over other male athletes evidenced in research, before, during or even after testosterone therapy. No verification of identity should be requested from competition organisers other than that which is asked of all competitors.

4.1.2. **Women or those competing in the female category:** Any transgender woman over 16 and post-puberty (male-to-female transgender person) may compete in the female category of Domestic Competition run under the auspices of Paddle UK and run in accordance with Paddle UK regulations and policies, by providing evidence that they meet the eligibility requirements as set out in Clause 5 **OR** she may compete in any male, Open or Mixed category, if she has not started hormone treatment.

4.1.3. **Any transgender girl under 16 and post-puberty** (male-to female transgender person) may compete in any male, Open or Mixed competition category of Domestic Competition. The individual must provide sufficient information from her GP and/or consultant to ascertain the stage of pubertal development that they have reached.

4.1.4. **Any transgender girl pre-puberty (male-to female transgender person)** may compete in any female, Open or Mixed category of Domestic Competition subject to confirmation of her stage of pubertal development. There is no gender-related advantage pre-puberty. Evidence must be provided to Paddle UK in the form of sufficient information from her GP and/or consultant to ascertain the stage of pubertal development that the individual has reached. She will not be permitted to compete until this has been submitted and assessed. This is subject to an annual review and once a GP and/or consultant has determined that the athlete has reached puberty, then they must meet the requirements outlined in section 4.1.2.

4.1.5. **Any transgender girl or woman during hormonal transition or prior to meeting the requirements to compete in Domestic Competition in the female category** may compete in any male, Open or Mixed category of Domestic Competition until which point they meet the eligibility requirements outlined in Clause 5 and they are approved to compete in female categories.

4.2. For the avoidance of doubt, none of the Domestic Competition regulations set out under this Policy impact on a transgender person's ability to compete in **Open or Mixed** competition

categories in any discipline. Transgender paddlers are permitted to compete in Open or Mixed categories without restriction.

- 4.3. Where competitions include Mixed events, or where teams are required to have mixed representation of male and female athletes, athletes should represent the category they are currently eligible to compete under and have been certificated for under this Policy.

5. Eligibility Requirements for transgender Women (male-to-female transgender person)

- 5.1. A transgender woman seeking to compete in the female category must satisfy the following criteria:
 - 5.1.1. complete a declaration that their affirmed gender aligns with the female competition category as well as acknowledging and accepting that if successful, they cannot change their competition category in the context of competing under this Policy again for a minimum of four years;
 - 5.1.2. submit evidence from their GP or consultant that their total testosterone level in serum has been below 10 nmol/L for at least 12 months prior to submission of their application as well as confirmation from the GP or consultant that any hormone therapy has been administered in a verifiable manner and in line with any anti-doping regulations;
 - 5.1.3. maintain a total testosterone level in serum of below the required level of 10 nmol/L throughout the entirety of the period they wish to remain eligible to compete in the female category.
- 5.2. Applications under this Clause 5 should be submitted in accordance with the application process detailed in Clause 7 and any will be considered by the Paddle UK Transgender Eligibility Review Panel. Ongoing evidence of eligibility may be requested at any time during the period of eligibility by the Paddle UK Transgender Eligibility Review Panel.
- 5.3. Applicants should be aware that any submission of information that is knowingly false, may result in us taking appropriate disciplinary action against them, including, but not limited to, restrictions from paddling in any category.

6. Eligibility for International Competition

- 6.1. A transgender person wishing to compete in international competition, and/or be considered to represent Great Britain or England in paddlesport will be subject to the requirements outlined by the respective International Federation (including European Canoe Association Events), or the International Olympic Committee policy in the case of Olympic and Paralympic events.
- 6.2. A transgender person seeking to compete in events under the auspices of the International Rafting Federation and/or World Surf Kayak Association should follow the organisation's Transgender Competition Policy where one is available.

7. Implementation and Protocol for Transgender Enquiries & Review

- 7.1. There will be two application windows throughout the year, one in November and one in March. A transgender person should register their intention to compete under this Policy by submitting an application by 11:59pm on the 1st November or by 11:59pm on the 1st March using the

[following form](#). Applications received after the deadline will not be considered, and will need to be resubmitted prior to the following application window, following the most up-to-date evidence requirements as set out in the policy.

7.2. We will convene a Paddle UK Transgender Eligibility Review Panel, (the Panel) to review all applications to compete under this Policy. The Panel will consist of three members of Paddle UK staff comprised from three of the following teams:

- 7.2.1. Governance & Legal;
- 7.2.2. Competitions and Events; and/or
- 7.2.3. Performance.

7.3. We may also invite additional observers to join the Panel, who have relevant medical and/or lived experience of a transgender identity. These observers are not decision-makers within the Panel, but will serve as external check-and-challenge to the Panel review process.

7.4. The Panel will convene annually between November and December, and March and April, to review applications and approve them for competition in the following season. Applications will be reviewed, and if any further documentation or evidence is required, the Panel may request this directly from the athlete. If the athlete is under the age of 18, this may be requested from their legal parent or guardian. In addition, transgender people (and their legal guardians, if appropriate) will be asked to permit their GP and/or consultant to disclose sufficient information to allow the Panel review. All documentation will be managed sensitively and confidentially in accordance with the relevant Data Protection legislation in effect at the time, and where relevant, the Gender Recognition Act 2004.

7.5. Following the Panel review, a decision will be provided to the applicant within four weeks of the Panel meeting. Where an application satisfies the requirements of this Policy and the athlete is approved to compete, the Panel will issue the athlete and relevant Paddle UK Discipline Committee a certificate of confirmation and the athlete will be able to enter competitions and events in their affirmed gender following the 1st January for applications made in November and 1st May for applications made in March.

7.6. General enquiries related to a query regarding the content or application of this Policy or the supporting documents, should be directed to equality@paddleuk.org.uk. Whilst all enquiries will be handled sensitively and confidentially, please note that to compete in Domestic Competition or International Competition it will be necessary to contact the relevant Paddle UK Discipline Committee or International body.

Appendix 1 – Self-Identification

Any competition which is neither Domestic Competition or International Competition, is subject to the following regulations regarding self-identification. Self-identification permits transgender competitors to compete under the competition category that most closely aligns to their affirmed gender providing they meet the following criteria.

1. If a transgender competitor changes the category under which they compete, they are not permitted to make further changes for the duration of two complete seasons.
2. Transgender competitors must notify Paddle UK of their intention to change their competition category by following the process outlined in Clause 7.1. confirming the event or competition they intend to compete in, providing supporting evidence against the criteria for competition, and confirming that they understand the terms of competition under self-identification.
3. The Paddle UK Transgender Eligibility Review Panel will review the application and where an application satisfies the requirements of this Policy and the athlete is approved to compete, the Panel will issue the athlete and relevant Paddle UK Discipline Committee a certificate of confirmation.
4. If a transgender person wishes to compete at Domestic Competition level, but they do not satisfy the relevant criteria in Clause of this Policy, they will be permitted to continue to compete at their previous competition level under the self-identification provisions until they can provide the evidence required and they have been issued with a certificate of confirmation.
5. For competition where self-identification applies, self-identification is also permitted for non-binary and intersex athletes under the same process.