

# Changing Room and Toilet Gender Rules

## 1. Purpose

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This policy provides guidance on the use of gender-specific and gender-neutral facilities in line with the UK Supreme Court's 2025 ruling and updated guidance from the Equality and Human Rights Commission (EHRC). It ensures compliance with legal obligations while offering an inclusive and respectful environment for all members, visitors and hotel guests.

## 2. Scope

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This policy applies to all Hotel Guests, Team Members, Leisure and Spa members, Contractors and any other hotel visitors.

## 3. Legal Context

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- The UK Supreme Court ruling clarified that "sex" in the Equality Act 2010 refers to biological sex.
- The Hotel will provide single-sex toilet & where applicable, changing facilities. The Hotel or Leisure club may exclude transgender individuals from such spaces if it is a proportionate means of achieving a legitimate aim, such as protecting privacy or dignity.
- Building regulations now require the provision of single-sex toilets and/or self-contained unisex toilets in public and non-domestic buildings.

## 4. Facilities Access

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### a. Single-Sex Facilities

- Access to single-sex changing rooms and Public toilets is based on biological sex.
- Transgender individuals will be excluded from these spaces where such exclusion is a proportionate means of achieving a legitimate aim (e.g., safeguarding or privacy concerns).

### b. Alternative Provision

- In the interest of privacy and dignity, individuals may use the self-contained gender-neutral/Accessible facility or where not available a hotel bedroom.
- Requests will be handled with sensitivity and confidentiality.

## 5. Inclusion and Respect

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- All members must be treated with dignity and respect.
- Harassment, bullying, or discrimination on the basis of gender identity or sex is strictly prohibited.

## 6. Communication

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Signage will be reviewed and implemented to clearly indicate the type of facilities provided (e.g., "Male – Biological Sex," "Female – Biological Sex," or "Unisex/Accessible").

## 7. Complaints and Concerns

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- Anyone who feels they have been treated unfairly or wishes to raise concerns about facilities should contact the Hotel or Leisure Club manager.
- All concerns will be handled confidentially and in accordance with the organisation's complaint/grievance procedures.

## 8. Failure to Adhere to Hotel/Club Policy

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All Hotel Guests, Team Members, Leisure and Spa members, Contractors and any other hotel visitor are expected to comply with all Hotel/Club rules and policies. In the event of non-compliance, the following procedure will apply:

### 1. First Infringement

A verbal request will be issued to the person, outlining the nature of the breach and the expectations for future conduct.

### 2. Second Infringement

A formal written communication will be sent. This will reiterate the breach, reference the prior verbal request and state clearly that further infractions may result in exclusion from the hotel/club, membership cancellation and for team members potential formal disciplinary sanction.

### 3. Third Infringement

The person will be excluded/barred from using the Hotel/Club changing and toilet facilities and potentially the site as a whole. For Leisure Club members, a formal letter of termination will be issued, and any remaining membership dues will be refunded on a pro-rata basis if paid annually. For team members the formal sanction may be to dismissal. The Hotel reserves the right to bypass steps in this process for serious, dangerous or deliberate breaches of the policy, at its discretion.

## 9. Policy Review

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This policy will be reviewed annually or in response to any legal or regulatory changes.