



**Freedom of Information request ref 01/FOI/25/3571
We received your request on the 29/07/2025.**

Request

You asked us:

**Dear British Transport Police,
I am writing on behalf of Transiness, an organisation dedicated to informing and supporting transitioned women: that is, individuals who have undergone gender-affirming hormone therapy (HRT) and/or lower gender-affirming surgeries (e.g., vaginoplasty). Following recent reports regarding the British Transport Police's approach to strip searches involving transgender women, we are seeking specific procedural clarification on behalf of our community. We really need clarity, as the announcement has caused considerable alarm and distress.**

In particular, we request detailed responses to the following:

1. Determination of Gender:

- **How do officers establish who is transgender and whether a transgender woman holds a**

Gender Recognition Certificate (GRC) at the time of a search?

- **Are transgender women now required to carry proof of their legal gender status in anticipation of potential searches?**
- **Are officers advised to presume birth-assigned sex without documentation?**

2. Default Classification:

- **In the absence of a GRC or immediate proof, how are transitioned women's gender classified**

for the purposes of determining search procedure?

3. Assignment of Officers:

- **Who is authorised to conduct a strip and intimate search of a transgender woman when GRC**

status is unknown, and when it is known?

4. Safeguards:

- **What risk assessments, dignity protections, and psychological safeguards are in place during**

the strip or intimate search of transgender women, particularly those who may not have

access to documentation at the time?

5. Training Provided to Officers Conducting Searches of Transgender Women:

- What specific training have officers and those involved in intimate searches received regarding the legal rights, bodily integrity, and specific anatomical considerations relevant to transgender women, including those who have undergone gender-affirming surgeries (e.g., vaginoplasty, examination of/under transgender women's breasts)?
- Does this training address trauma-informed practices, psychological risk mitigation, and safeguarding standards specific to transgender individuals?
- Would a male officer be present while a transitioned woman is being vaginally examined?
- Was external expert advice (e.g., from transgender healthcare specialists) consulted in the design and delivery of this training?
- What would be the procedure for managing any immediate health concerns during or following a vaginal examination (for example, pain, bleeding, tissue trauma)?
- Would trans women's vaginas be examined digitally (i.e., using fingers), by probe, another object, or both? Would the examiner be male or female?
- Is there formal documentation or certification associated with this training?
- If no specialised training has been provided for either strip or intimate searches, please confirm this explicitly.

6. Prevalence:

In the last 12 months -

- How many transgender women were subjected to a strip search by British Transport Police officers?
- How many transgender women were subjected to an intimate search by British Transport Police officers?

Given the gravity of these concerns, we trust that a transparent and detailed response will be provided in order to reassure our members, at the moment, there simply isn't enough readily available information.

We have handled your request under the Freedom of Information Act (FOIA)

Our response:

Questions 1-4

Determination of Gender:

How do officers establish who is transgender and whether a transgender woman holds a Gender Recognition Certificate (GRC) at the time of a search?
In the absence of a GRC or immediate proof, how are transitioned women's gender classified for the purposes of determining search procedure?

The custody officer will be responsible for making the determination of the sex of the detained person for the purposes of a statutory search.

Prior to commencement of More Thorough or Exposing Intimate Parts (EIP) Search the detainee should be asked what sex they are.

If there are grounds to doubt that the declared sex accurately reflects the person's biological sex for the purpose of statutory searches, officers may take steps to ascertain the sex of the detained person. In the absence of any further information, officers will search the detainee according to what appears to be their biological sex and not their stated declaration for statutory searches.

If the detained person advises they are trans, they should be asked who they would prefer to be searched by. Where the Transgender or Non-Binary detainee indicates a preference to be dealt with by officers of a different biological sex to them for More Thorough and EIP searches, the detained person is to be informed that this can only be conducted as a consensual search. This means where an officer has the relevant power to search, the person may consent to a search being conducted in a manner which is outside the terms of the statutory powers.

It is important to note that the purpose of the consensual regime is to preserve the integrity and dignity of transgender detainees who are in custody. This does not apply to an officer/staff. This means that an officer or staff may not propose that the search be conducted outside of the legal regimen to enable them to search the detained person

• Are transgender women now required to carry proof of their legal gender status in anticipation of potential searches?

No

3. Assignment of Officers:

• Who is authorised to conduct a strip and intimate search of a transgender woman when GRC status is unknown, and when it is known?

The Officer must be the same biological sex (sex registered at birth) as the person being searched for More Thorough and EIP searches under statutory powers. (Section 54 of the Police and Criminal Evidence Act 1984 and Code of Practice on the Exercise by Constables of Powers of Stop and Search of the Person in Scotland). It is important to note that EIP searches must still always approved by an Inspector out of custody and Custody Sergeant within custody as per College of Policing APP.

A detained person may request a consensual search as outlines in Q1. The person must be capable of giving consent and consent should not be sought if the person is deemed unfit through drink or drugs or does not have the relevant mental capacity to decide this.

This is a visual search only and the officer must not touch any of the intimate parts being exposed.

Intimate searches are carried out by medical professionals.

4. Safeguards:

• What risk assessments, dignity protections, and psychological safeguards are in place during the strip or intimate search of transgender women, particularly those who may not have access to documentation at the time?

British Transport Police recognises the status of Transgender and Non-Binary detainees/staff from the moment they propose to undergo, undergo or have undergone a process to reassign their sex, or identify in a lived gender which is different to their sex, with or without a GRC. This means that even when a person has not legally changed their sex, we should continue to use their preferred pronouns and recognise the person's lived gender.

Under PACE Code C, specific safeguards must be in place when conducting searches involving the exposure of intimate parts. According to PACE Code C, paragraph 1.13(d), a person is considered vulnerable if they:

- Have a mental health condition or learning disability
- Have difficulty understanding or communicating

- Are under 18 years of age

These safeguards are designed to protect the dignity, welfare, and legal rights of individuals in custody. If there is any reason to suspect that a person may be vulnerable, they must be treated as such unless there is clear evidence to the contrary.

An Exposing Intimate Parts Search of a vulnerable person may take place only in the presence of the appropriate adult of the **same sex**, unless the detainee specifically requests the presence of a particular adult of the opposite sex.

For searches involving exposure of intimate parts, an Appropriate Adult must be present for any child or vulnerable person during the search.

The only exception is if:

- The child or vulnerable person specifically requests that the Appropriate Adult not be present, and
- The Appropriate Adult agrees to this request in the presence of the request by the detained person.

This decision must be clearly recorded in the custody record and signed by the Appropriate Adult

Due to the potentially traumatic effect of these searches a safeguarding referral must be made when conducting an EIP search of a juvenile in all cases and consideration should be made when conducting one on adults.

Public Protection and Vulnerability (PP&V) colleagues work closely with statutory partners, support agencies and engage frequently with key stakeholders in the rail industry and beyond. Their focus is firmly on safeguarding vulnerable individuals who use the transport network across England, Scotland and Wales. The team of specialist officers and police staff are available to provide support and guidance to frontline colleagues to improve the response to all forms of vulnerability.

In relation to question 5-

Such searches would not be conducted by Police Officers or Detention Officers; these would be conducted by medical professionals.

Question 6:

We have conducted a search on stop search records where the search was recorded as a full or partial strip. This did not return any records within scope of the request.

Custody records have been searched for detainees in the requested time period where the gender was recorded as 'Indeterminate/unknown/blank' and records returned manually reviewed. This did not return any records within scope of the request.

Again, relating to '*intimate searches*'- Such searches would not be conducted by Police Officers or Detention Officers; these would be conducted by medical professionals.