



**CYCLING  
IRELAND**

Cycling Ireland Policy Number

CIP\_2021\_2

# **Cycling Ireland Transgender People Policy**

Version 3

Date 09/12/2021

# Document History

| Date       | Author          | Comments / Updates   | Version |
|------------|-----------------|--|---------|
| Dec 2021   | Cycling Ireland | Original Version V2 Presented  |         |
| 09/12/2021 | Paul Watson     | Document formatted to CI Policy Layout<br>Removed staff names – functions remain<br>There were two article 1’s in original document – renumbered accordingly.<br>Updated UCI & CI Hyperlinks | V3      |
|            |                 |  |         |
|            |                 |  |         |
|            |                 |  |         |
|            |                 |  |         |
|            |                 |  |         |
|            |                 |  |         |
|            |                 |  |         |
|            |                 |  |         |
|            |                 |  |         |
|            |                 |  |         |

# Index

|   | <b>Title</b>                                       | <b>Page</b> |
|---|--|-------------|
| 1 | Introduction                                       | 4           |
| 2 | Transgender People as employees of Cycling Ireland | 5           |
| 3 | Transgender People in Competition                  | 6           |
| 4 | Procedure for Licencing                            | 7           |
| 5 | Apeals and Grievance Procedure                     | 8           |
| 6 | Review of Policy                                   | 10          |
| 7 | Appendices   |             |
|   | 1 UCI Regulations Clarification 2020               | 11          |
|   | 2 Glossary of Terms                                | 13          |
|   | 3 Resources  | 17          |

## **1. INTRODUCCION**

This policy was developed to safeguard and protect the rights and dignity of all those engaged in competition in Ireland, and trans people in particular. It aims to encourage and support the participation of trans people in the sport of cycling in Ireland, and develop a more diverse and inclusive organisation. Cycling Ireland does not accept any transphobia or discrimination against trans people taking part in the sport of cycling as competitors, officials, staff, coaches, volunteer or spectators.

Transphobia includes discriminatory language or behaviour directed towards anyone who identifies as a Trans Person, anyone associated with someone who identifies themselves as a Trans person, or anyone that may be perceived to be a Trans person (whether they are a trans person or not). Discriminatory behaviour may include a reluctance or refusal to provide access to services to the same extent as that provided for a non-trans person. Cycling Ireland, its member organisations, their clubs and their members will ensure that any discriminatory behaviour or language is addressed with appropriate sanctions and/or educational programmes implemented to ensure compliance with this policy and the creation of a safe, inclusive and welcoming environment for Trans people. The following points are considered good practice for Cycling Ireland its member organisations, their clubs and members with regard to a Trans person's needs:

- Treat the individual with dignity and respect.
- Respect the private and confidential nature of the individual's situation.
- In general no information should be shared unless express permission is given by the Trans person.
- Encourage the individual to report any discriminatory language or behaviour from other individuals.
- Ensure a Code of Conduct is publicised indicating a zero-tolerance policy towards all bullying/harassment of Trans people.

Any reports of discriminatory language or behaviour should be directed to the Safeguarding Officer of Cycling Ireland, at [safeguarding@cyclingireland.ie](mailto:safeguarding@cyclingireland.ie).

## **2. TRANSGENDER PEOPLE AS EMPLOYEES OF CYCLING IRELAND**

No discrimination, unfair or unreasonable behaviour will be tolerated by Cycling Ireland, and action will be taken in line with the Equal Status Acts 2010-2018<sup>1</sup> and the Gender Recognition Act of 2015<sup>2</sup>.

See: <https://www.ihrec.ie/guides-and-tools/human-rights-and-equality-in-the-provision-of-good-and-services/what-does-the-law-say/equal-status-acts> for further information.

---

<sup>1</sup> Equal Status Acts 2010-2018: <https://www.ihrec.ie/guides-and-tools/human-rights-and-equality-in-the-provision-of-good-and-services/what-does-the-law-say/equal-status-acts/>

<sup>2</sup> Gender Recognition Act 2015: <https://www.oireachtas.ie/en/bills/bill/2014/116/>

### **3. TRANSGENDER PEOPLE IN COMPETITION**

Cycling Ireland (CI) and its members must not restrict the participation of a Trans person in the sport unless this is strictly necessary to uphold fair or safe competition. Any other restriction would amount to direct discrimination.

Cycling Ireland and its members should treat a Trans person as belonging to the sex in which they present (as opposed to the biological sex they were born with) unless this is deemed to give the Trans person an unfair advantage, or would be a risk to the safety of competitors. Any negative effect of restricting the participation of Trans people must be mitigated as far as possible, to permit as much inclusion as is deemed fair and safe.

Cycling Ireland recognises that consistency with UCI's position is appropriate for athletes to compete fairly in cycling events in Ireland. UCI have adopted the "Guidelines on sex reassignment" adopted by the IOC in November 2015, and their own updated and clarified Memorandum on the Eligibility Regulations for Transgender Athletes on the 1<sup>st</sup> of March 2020.<sup>3</sup>

Cycling Ireland will therefore adopt the UCI's statement and guidelines with regards to Trans people and their status in competition (see Part 4).

---

<sup>3</sup> UCI Memorandum on the Eligibility Regulations for Transgender Athletes: [https://www.uci.org/docs/default-source/rules-and-regulations-right-column/part-xiii---medical-rules---amendments-to-regulations-as-from-01.03.2020.pdf?sfvrsn=589c7c28\\_2](https://www.uci.org/docs/default-source/rules-and-regulations-right-column/part-xiii---medical-rules---amendments-to-regulations-as-from-01.03.2020.pdf?sfvrsn=589c7c28_2)

#### **4. PROCEDURE FOR LICENCING**

Cycling Ireland's licencing protocol and procedures provide guidance for Transgender people competing in cycling events in Ireland and instructions on how to obtain and maintain a Cycling Ireland Licence.

It is prepared in accordance with Cycling Ireland's Policy and Procedure For Transgender Individuals And Athletes In Cycling Ireland and in compliance with recommendations from the International Olympic Committee (IOC) Working Meeting held in Lausanne on 19 October 2019.<sup>4</sup> The IOC guidelines have been adopted by Cycling Ireland, encompassing all Olympic and non-Olympic cycling disciplines in Ireland.

#### **Procedure**

The below applies only to Male to Female (MtF)/Trans women. Female to Male (FtM)/Trans men are able to obtain their licence in the male category without restriction.

- 4.1.** It is the responsibility of the Trans person (individual) to contact the Cycling Ireland Nominated Person in the Membership Team (contactus@cyclingireland.ie) prior to taking out a licence in a sex that is opposite to their sex at birth.
- 4.2.** The CI CEO and CI Medical Advisor will be advised.
- 4.3.** The individual will be provided a copy of the Trans People Policy.
- 4.4.** To obtain a CI licence to compete as a female, a MtF/Trans woman must:
  - (a)** Demonstrate Blood hormone testosterone levels consistently less than 5nmol/L.
  - (b)** At their own cost, complete and provide Blood hormone records) for at least 12 months (at intervals of approximately 3 months or less; i.e. at least 4 separate values). Please note all blood hormone records within this timeframe must be provided to the CI Medical Advisor.
- 4.5.** To maintain a CI licence to continue competing as a female athlete, a MtF/Trans woman must:
  - (a)** Maintain a blood hormone testosterone level of less than 5nmol/L.
  - (b)** At their own cost, complete blood hormone testing at (approximately) 3 monthly intervals and provide documentation to the CI Medical Advisor.
  - (c)** At their own cost, complete blood hormone evaluations within 4 weeks of any participation in key national and international events such as National Championships, European Championships, Cycling Ireland or UCI

---

<sup>4</sup> [https://stillmed.olympic.org/Documents/Commissions\\_PDFfiles/Medical\\_commission/2015-11\\_ioc\\_consensus\\_meeting\\_on\\_sex\\_reassignment\\_and\\_hyperandrogenism-en.pdf](https://stillmed.olympic.org/Documents/Commissions_PDFfiles/Medical_commission/2015-11_ioc_consensus_meeting_on_sex_reassignment_and_hyperandrogenism-en.pdf)

sanctioned events and/or World Cups and World Championships and provide documentation to the CI Medical Advisor.

- 4.6.** A T.U.E. (Therapeutic Use Exemption) must be obtained by trans athletes in ordanance with Sport Ireland’s TUE Policy (can be found [HERE](#)) in order to compete whilst taking the medication necessary to stay healthy.
- 4.7.** Confirmation of the compliance or non-compliance of Clauses 3.4 and 3.5 will be advised by the CI Medical Advisor to the CI Nominated person in the Membership Team and the CI CEO.
- 4.8.** The CI Nominated Person in the Membership Team will contact the individual to issue the required licence if confirmation of compliance is received.

### **Delegated Authority**

- 4.9.** The designated point of contact at Cycling Ireland for all enquiries relating to the participation of Trans people in cycling is the Cycling Ireland Nominated Person in the Membership Team who will advise the Cycling Ireland CEO and liaise with Cycling Ireland’s Medical Advisor.

All decisions relating to the eligibility to gain and retain a CI race licence are solely at the discretion of the Cycling Ireland CEO.

### **Communication and Confidentiality**

- 4.10.** In alignment with the CI Transgender People Policy confidentiality of individuals will be maintained through a controlled line of communication.
- 4.11.** All blood hormone records and results, questions and/or correspondence relating to a trans persons hormone monitoring should be directed to the CI Medical Advisor
- 4.12.** The CI Medical Advisor will communicate only with the CI Nominated Person in the Membership Team and/or CI CEO in relation to these records and results, however the CI Medical Advisor may seek further confidential expert medical advice if they deem it appropriate.

### **Non-compliance**

- 4.13.** Non-compliance with the conditions described may result in a loss of eligibility for a CI licence for a minimum of 12 months or at the discretion of the CI CEO.

## **5. APPEALS AND GRIEVANCE PROCEDURE**

- 5.1** A trans person can appeal against their categorisation to the Equality Officer and it will be dealt with in accordance with points **4.10, 4.11 and 4.12** above regarding confidentiality and expert advice and Cycling Ireland's Complaints and Disciplinary Procedure Policy.
- 5.2** Any bullying or issues in contravention of this policy and the Equality policies of Cycling Ireland will be addressed in accordance with Cycling Ireland's Complaints and Disciplinary Procedure.

## **6. REVIEW OF POLICY**

This policy will be reviewed regularly and updated if required to ensure it is aligned to international standards.

## **7. APPENDICES**

### **APPENDIX 1**

#### **THE UCI UPDATES AND CLARIFICATION ON ITS REGULATIONS ON TRANSGENDER ATHLETE PARTICIPATION**

Excerpt from 11 February, 2020 UCI press release<sup>5</sup>

The UCI updates and clarifies its regulations on transgender athlete participation

In line with the announcement it made on 4 November 2019, the Union Cycliste Internationale (UCI) approved its new regulations on the eligibility of transgender athletes to compete in events on the UCI International Calendar. The decision was made at the meeting of its Management Committee in Dübendorf (Switzerland) on 30 January.

The new regulations, which will come into effect on 1 March 2020, are designed to encourage transgender athletes to compete in the category corresponding to their new gender, while guaranteeing a level playing field for all athletes in the competitions in question.

#### **What are the eligibility criteria?**

Up until then, the eligibility criteria for competing in the corresponding gender-identity category were those agreed on at a consensus meeting organised by the International Olympic Committee (IOC) in 2015. The provision of new scientific knowledge led to those eligibility criteria being reviewed – in particular for male-to-female athletes – at a working meeting held in Lausanne on 19 October 2019, and which was attended by the UCI, other International Federations, experts and representatives of transgender and cisgender athletes. As part of the new consensus, it is agreed that if a Federation decides to use testosterone as an indicator, the transgender athlete will only be eligible to compete in the Women category if their serum testosterone level is below 5 nmol/L.

---

<sup>5</sup> The UCI News Release 11<sup>th</sup> February 2020: <https://www.uci.org/pressrelease/the-uci-updates-and-clarifies-its-regulations-on-transgender-athlete-participation/teHrcYyniPIPsyO3AZ9yi>

## **What is the eligibility procedure?**

- All transgender athletes wishing to compete in the category corresponding to their new gender must make their request to the medical manager appointed by the UCI, at least six weeks before the date of the first competition.
- The athlete's file will be passed on to a commission of three international experts independent of the UCI. The commission's members will assess the athlete's eligibility to compete in the new gender category and will inform the UCI's medical officer of their conclusions.
- The athlete must prove that their serum testosterone level has been below 5 nmol/L for at least 12 months prior to the eligibility date.
- Once deemed eligible, the athlete must agree to keep their serum testosterone level below 5 nmol/L for the entire time they compete in the Women category.
- The athlete must undergo serum testosterone tests conducted using a benchmark method (mass spectrometry).

Once their eligibility to compete has been confirmed, the UCI's medical manager will be responsible for ensuring the athlete complies with the eligibility regulations throughout their sporting career. Should they fail to do so, the medical manager may choose to suspend their eligibility to compete until such time as the athlete proves that they are able to comply with the criteria again.

In the event of any breach of the regulations, a penalty system shall come into effect. Penalties shall range from a mere reprimand and warning to disqualification and a fine.

The UCI has asked its National Federations to include these new directives in their regulations.

"The adoption of new directives in the UCI Regulations will provide the cycling community as a whole with a clearly defined regulatory framework that applies to everyone," said UCI President David Lappartient. "Thanks to this consensus, achieved by a working group representing our sport's various stakeholders, our Federation has given itself the wherewithal to take into consideration – and in reflection of developments in our society – the desire of transgender athletes to compete, while guaranteeing a level playing field for all competitors. This is an important step in the inclusion of transgender athletes in elite sport."

The UCI Memorandum on the Eligibility Regulations for Transgender Athletes can be found here: [https://www.uci.org/docs/default-source/rules-and-regulations-right-column/part-xiii---medical-rules---amendments-to-regulations-as-from-01.03.2020.pdf?sfvrsn=589c7c28\\_2](https://www.uci.org/docs/default-source/rules-and-regulations-right-column/part-xiii---medical-rules---amendments-to-regulations-as-from-01.03.2020.pdf?sfvrsn=589c7c28_2)

## **APPENDIX 2**

### **GLOSSARY OF TERMS<sup>6</sup>**

#### **Disorder of Sex Development (DSD)**

A generic definition encompassing any issue noted at birth where the genitalia are atypical in relation to the chromosomes or gonads. Since 2006, this is the preferred term for intersex by some, but not all, medical practitioners in the area.

DSD has been contested because it presumes an underlying 'disorder' and that there is something intrinsically wrong with the intersexed body requiring it to be fixed as either male or female (see definition of Intersex and Variation of Sex Development).

#### **FTM**

A female-to-male trans person (see definition of Trans man).

#### **Gender Identity Disorder**

In DSM-IV[2], GID is the psychiatric diagnosis used when a person has (1) a strong and persistent cross-gender identification and (2) persistent discomfort with his or her sex or sense of inappropriateness in the gender role of that sex, and the disturbance (3) is not concurrent with physical intersex condition and (4) causes clinically significant distress or impairment in social, occupational or other important areas of functioning. This diagnosis was removed from the DSM-V and replaced with Gender Dysphoria. In the current Irish context, in practice a diagnosis of GID or Gender Dysphoria is required to access hormones or surgery through the public healthcare system.

#### **Hormone Replacement Therapy (HRT) or Hormones**

The use of hormones to alter secondary sex characteristics. Some trans people take hormones to align their bodies with their gender identities. Other trans people do not take hormones for many different reasons (see definition of Transition).

#### **Hermaphrodite**

Generally considered derogatory; has been replaced by the term intersex (see definition of Intersex).

#### **Intersex**

Refers to individuals who are born with sex characteristics (such as chromosomes, genitals, and/or hormonal structure) that do not belong strictly to male or female categories, or that belong to both at the same time.

A person with an intersex variation may have elements of both male and female anatomy, have different internal organs than external organs, or have anatomy

---

<sup>6</sup> From the Transgender Equality Network Ireland: <https://www.teni.ie/resources/trans-terms/>

that is inconsistent with chromosomal sex. These variations can be identified at birth (where there is obviously ambiguous genitalia), at puberty (when the person either fails to develop certain expected secondary sex characteristics, or develops characteristics that were not expected), later in adulthood (when fertility difficulties present) or on autopsy.

Most individuals who are intersex do not identify as transgender or do not consider themselves covered by the transgender umbrella.

### **MTF**

Male-to-female trans person (see definition of Trans woman).

### **Non binary**

An umbrella term for gender identities that fall outside the gender binary of male or female. This includes individuals whose gender identity is neither exclusively male nor female, a combination of male and female or between or beyond genders. Similar to the usage of transgender, people under the non-binary umbrella may describe themselves using one or more of a wide variety of terms.

### **Sex change**

Generally considered derogatory; has been replaced by the terms 'transition' or 'surgery' (see definition of Transition and Surgery).

### **Surgery**

A set of surgical procedures that alter a person's physical appearance or the functioning of their existing sexual characteristics. Other terms include Gender Confirmation Surgery, Gender Reassignment Surgery, Sex Reassignment Surgery, Genital Reconstruction Surgery, Sex Affirmation Surgery and so on.

Some trans people undergo surgery to align their bodies with their gender identities. Other trans people do not undergo any surgery for many different reasons.

Some trans people define themselves by their surgical status such as post-operative (post-op), pre-operative (pre-op) or non-operative (non-op). However, these terms place emphasis on genitals as a marker for gender identity and may be rejected by people who do not see their gender as related to surgical status.

### **Tranny**

A slang term for many different trans identities. Some find this term highly offensive, while others may be comfortable with it as a self-reference, but consider the term derogatory if used by outsiders. It is recommended to avoid using this term.

### **Transgender**

Refers to a person whose gender identity and/or gender expression differs from the sex assigned to them at birth. This term can include diverse gender identities.

Not all individuals with identities that are considered part of the transgender umbrella will refer to themselves as transgender. For some, this may be because they identify with a particular term (such as transsexual or genderqueer) which they feel more precisely describes their identity. Others may feel that their experience is a medical or temporary condition and not an identity (for example they feel they have gender identity disorder but are not transgender).

TENI advocates the use of transgender or trans as an umbrella term as it is currently the most inclusive and respectful term to describe diverse identities. However, we acknowledge and respect each individual's right to self-identify as they choose.

### **Trans\* or Trans**

Commonly used shorthand for transgender. Avoid using this term as a noun: a person is not 'a trans'; they may be a trans person.

### **Transphobia**

The fear, dislike or hatred of people who are trans or are perceived to challenge conventional gender categories or 'norms' of male or female. Transphobia can result in individual and institutional discrimination, prejudice and violence against trans or gender variant people.

### **Transition**

A process through which some transgender people begin to live as the gender with which they identify, rather than the one assigned at birth. Transition might include social, physical or legal changes such as coming out to family, friends, co-workers and others; changing one's appearance; changing one's name, pronoun and sex designation on legal documents (e.g. driving licence or passport); and medical intervention (e.g. through hormones or surgery).

### **Transsexual**

A person whose gender identity is 'opposite' to the sex assigned to them at birth. The term connotes a binary view of gender, moving from one polar identity to the other. Transsexual people may or may not take hormones or have surgery.

Use of the term 'transsexual' remains strong in the medical community because of the DSM's prior use of the diagnosis 'Transsexualism' (changed to "Gender Identity Disorder" in DSM- IV).

The term 'transsexual' is hotly debated in trans communities with some people strongly identifying with the term while others strongly rejecting it. Moreover, for some, 'transsexual' is considered to be a misnomer inasmuch as the underlying medical condition is related to gender identity and not sexuality.

### **Trans man**

A person who was assigned female at birth but who lives as a man or identifies as male. Some trans men make physical changes through hormones or surgery; others do not.

Trans man is sometimes used interchangeably with FTM (female-to-male). However, some trans men don't think of themselves as having transitioned from female to male (i.e. because they always felt male). Some people prefer to be referred to as men rather than trans men while others will refer to themselves as men of transgender experience.

### **Variation of Sex Development (VSD)**

Another term for 'intersex' preferred by some medical practitioners and intersex people in place of DSD as it removes the stigma of 'disorder' from the nomenclature (see definition of Intersex and Disorder of Sex Development).

### **Trans woman**

A person who was assigned male at birth but who lives as a woman or identifies as female. Some trans women make physical changes through hormones or surgery; others do not.

Trans woman is sometimes used interchangeably with MTF (male-to-female). However, some trans women don't think of themselves as having transitioned from male to female (i.e. because they always felt female). Some people prefer to be referred to as women rather than trans women while others may refer to themselves as women of transgender experience.

### **Trans**

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, included (but not limited to) transgender, transsexual, gender-queer (GQ), gender-fluid, non-binary, gender-variant, crossdresser, genderless, agender, nongender, third gender, two-spirit, bigender, trans man, trans woman, trans masculine, trans feminine and neutrois.

### **APPENDIX 3** **RESOURCES**

- Transgender Equality Network Ireland: <https://www.teni.ie/>
- A full glossary of terms related to non binary and trans people can be found here: <https://www.teni.ie/resources/trans-terms/>
- The Equal Status Acts 2010-2018: <https://www.ihrec.ie/guides-and-tools/human-rights-and-equality-in-the-provision-of-good-and-services/what-does-the-law-say/equal-status-acts>
- The Gender Recognition Act 2015: <https://www.oireachtas.ie/en/bills/bill/2014/116/>
- The IOC Consensus Meeting on Sex Reassignment and Hyperandrogenism November 2015: [https://stillmed.olympic.org/Documents/Commissions\\_PDFfiles/Medical\\_commission/2015-11\\_ioc\\_consensus\\_meeting\\_on\\_sex\\_reassignment\\_and\\_hyperandrogenism-en.pdf](https://stillmed.olympic.org/Documents/Commissions_PDFfiles/Medical_commission/2015-11_ioc_consensus_meeting_on_sex_reassignment_and_hyperandrogenism-en.pdf)
- The UCI Newsletter announcing changes to its Medical Regulations regarding transgender athletes [UCI Newsletter #74 - March 2020 \(mailchi.mp\)](#)
- The UCI Memorandum: Part XIII Medical Rules applying on the 1<sup>st</sup> March 2020, Chapter V: Eligibility Regulations for Transgender Athletes: [https://www.uci.org/docs/default-source/rules-and-regulations-right-column/part-xiii---medical-rules---amendments-to-regulations-as-from-01.03.2020.pdf?sfvrsn=589c7c28\\_2](https://www.uci.org/docs/default-source/rules-and-regulations-right-column/part-xiii---medical-rules---amendments-to-regulations-as-from-01.03.2020.pdf?sfvrsn=589c7c28_2)
- The UCI Regulations Part XIII Medical Rules latest version [Microsoft Word - 13-SEC-2019 10 10-ENG- version to be published on 1 Mars 2020 last form.docx \(ctfassets.net\)](#)