

LEISURE CENTRES: PUTTING WOMEN AND GIRLS AT RISK



A report from Women's Rights Network

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Executive Summary

Almost a third of all local authorities require women and girls to use mixed-sex changing rooms and showers when swimming, and most women in the UK have no access to single-sex swimming sessions.

This matters.

- Mixed sex changing villages are putting women and girls at risk of sexual assault¹ and voyeurism².
- Women are being led to believe 'women-only' sessions are single sex when they are not.

Our research has found that out of 256 local authorities in England and Wales:

- Fewer than half provide swimming sessions advertised as 'women-only' or 'ladies-only'.
- **Only 25** 'women-only' sessions exclude males who identify as women.

In Scotland

- Just **six** of 31 local authorities provide 'women-only' or 'ladies-only' swimming sessions.
- Only **three** of these are guaranteed to be single sex.

In Northern Ireland, **none** of the local authorities provide 'women only' or 'ladies only' swimming sessions.

In all areas of the UK, around **30%** of local authorities provide **no single sex changing or showering facilities** for pool users.

UK Leisure centres are badly failing women and girls.

- The Government is pumping millions into encouraging women and girls into sports and activity, and yet reduced access to single sex swimming results in fewer women swimming.
- When asked, women want female-only changing areas.

Women's Rights Network Demands:

- Local Authorities plans and guidance provided by the Sports Councils of England, Scotland, Northern Ireland and Wales **must prioritise** safeguarding and provide adequate risk assessments and public consultation for any village-style changing rooms.
- All service policies **must protect** the safety, dignity and privacy of women and girls.
- Local Authority and leisure centre staff should receive **training in the Equality Act 2010** so they understand that women and girls have a legal right to single-sex facilities.
- Sessions that are advertised as **women only** or **girls only** must be clear that they only accept females using a definition based on **sex**.

¹ <https://www.thetimes.co.uk/article/unisex-changing-rooms-put-women-in-danger-8lwbp8kgk>

² <https://www.telegraph.co.uk/news/2024/04/25/gang-hid-changing-rooms-pools-film-young-women-undressing/>

Introduction

This report investigates swimming facilities run by local authorities throughout the UK.

It exposes:

- The loss of single sex changing facilities.
- The lack of availability of female-only swimming sessions.

Swimming is one of the most popular forms of recreational exercise for women of all ages. As a low impact form of aerobic exercise, swimming is particularly beneficial for people who struggle with joint and mobility problems or health issues that make high impact activities impossible.

The Government's **Get Active** strategy³ aims to provide opportunities of access for everyone to get moving. It includes all types of physical activity and states that "*Public swimming pools are particularly important to the participation landscape, offering an accessible and low-impact option to take part in sport,...*". Sport England schemes such as 'This Girl Can' and 'We Are Undefeatable' are two examples of projects with government funding that aim to encourage women and girls.

Yet our Freedom of Information investigation has found that these efforts are completely undermined by providers who do not recognise the importance of female-only spaces for uptake of activity by women and girls.

- Women want female-only swimming sessions, and some women need female-only swimming sessions.
- Mixed sex changing villages put women and girls at risk of sexual assault⁴, voyeurism⁵ and the potential for non-contact sexual assault (flashing).

There is confusion amongst local authority providers over the definition of 'women-only' and they frequently state that this means anyone who identifies as a woman.

The Equality Act 2010 is clear⁶:

- Separate services are both lawful and appropriate as a "*proportionate means of achieving a legitimate aim*"⁷.
- For the purposes of the Act, "*woman means a female of any age*"⁸.
- Permitted single sex services are those that "*may be used by more than one person and a woman might object to the presence of a man*" such as "*separate male and female changing rooms to be provided in a department store*".
- Sports and recreation providers may lawfully exclude males from female activities - even those who have a Gender Recognition Certificate⁹.

Despite all this, women and girls are being denied access to single-sex sport and fitness

³ <https://www.gov.uk/government/publications/get-active-a-strategy-for-the-future-of-sport-and-physical-activity/get-active-a-strategy-for-the-future-of-sport-and-physical-activity>

⁴ <https://www.thetimes.co.uk/article/unisex-changing-rooms-put-women-in-danger-8lwbp8kgk>

⁵ <https://www.telegraph.co.uk/news/2024/04/25/gang-hid-changing-rooms-pools-film-young-women-undressing/>

⁶ <https://www.legislation.gov.uk/ukpga/2010/15/notes/division/3/16/20/7>

⁷ <https://www.legislation.gov.uk/ukpga/2010/15/section/19A?view=plain>

⁸ <https://www.legislation.gov.uk/ukpga/2010/15/section/212>

⁹ <https://www.legislation.gov.uk/ukpga/2010/15/section/195>

activities, and sex-segregated changing areas.

Freedom of Information Investigation

Details of our Freedom of Information (FOI) investigation, including the questions posed to local authorities in all the home countries, are available in Appendix B.

Data and Results

England and Wales

- Of 338 FOI requests sent, all authorities responded (100% response rate).

The replies:

- 82 local authorities (24%) stated that the information is not held.
- 133 local authorities provide at least one swimming session per week that is advertised as 'women-only' or 'ladies-only'.
- **Only 25** of the 133 'women-only' or ladies-only' swimming sessions **are single sex sessions that exclude males who identify as women.**
- Where a swimming session is advertised as 'women-only' or 'ladies-only', 31 have a specific policy guidance on access for males who identify as women: 20 of these are the Everyone Active policy, 5 are the UKActive policy¹⁰.
- Of the 25 authorities in England and Wales with a 'women-only' or ladies-only' swimming session guaranteed to be single sex, **NONE (ZERO)** have a specific policy on access for men who self-identify as women.

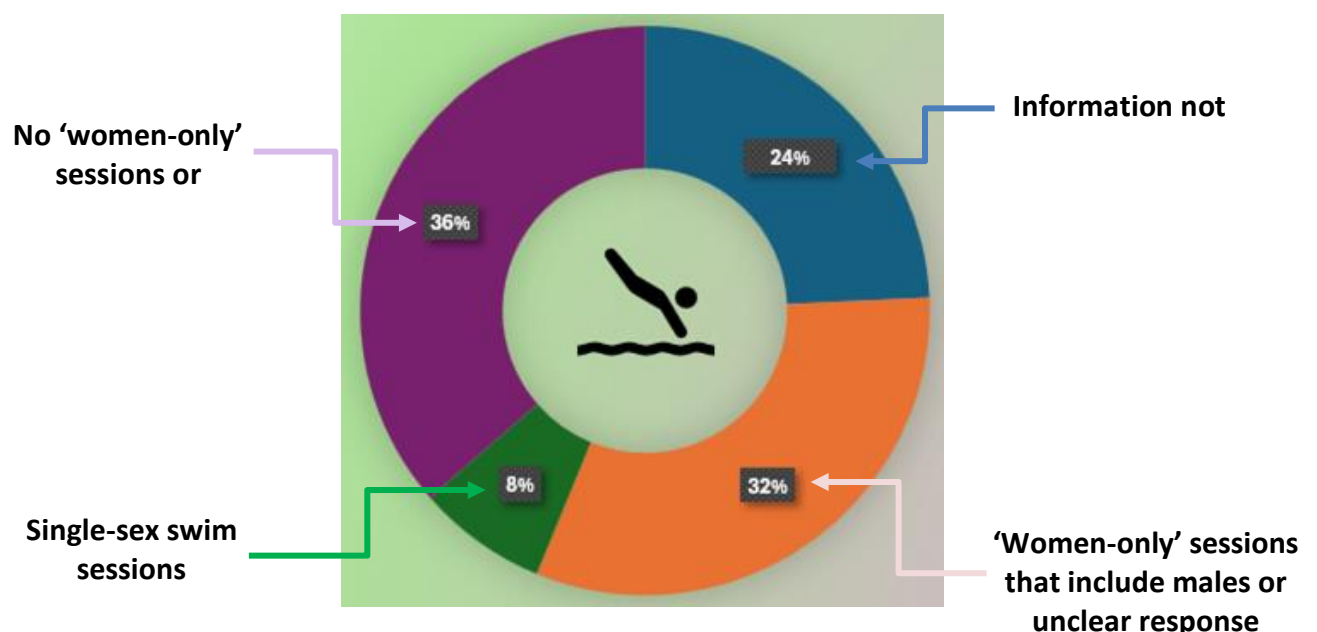


Figure 1: FOI investigation into the provision of Women-only swimming sessions
Data for England and Wales

¹⁰ See Appendix A

Changing facilities, toilets and showers:

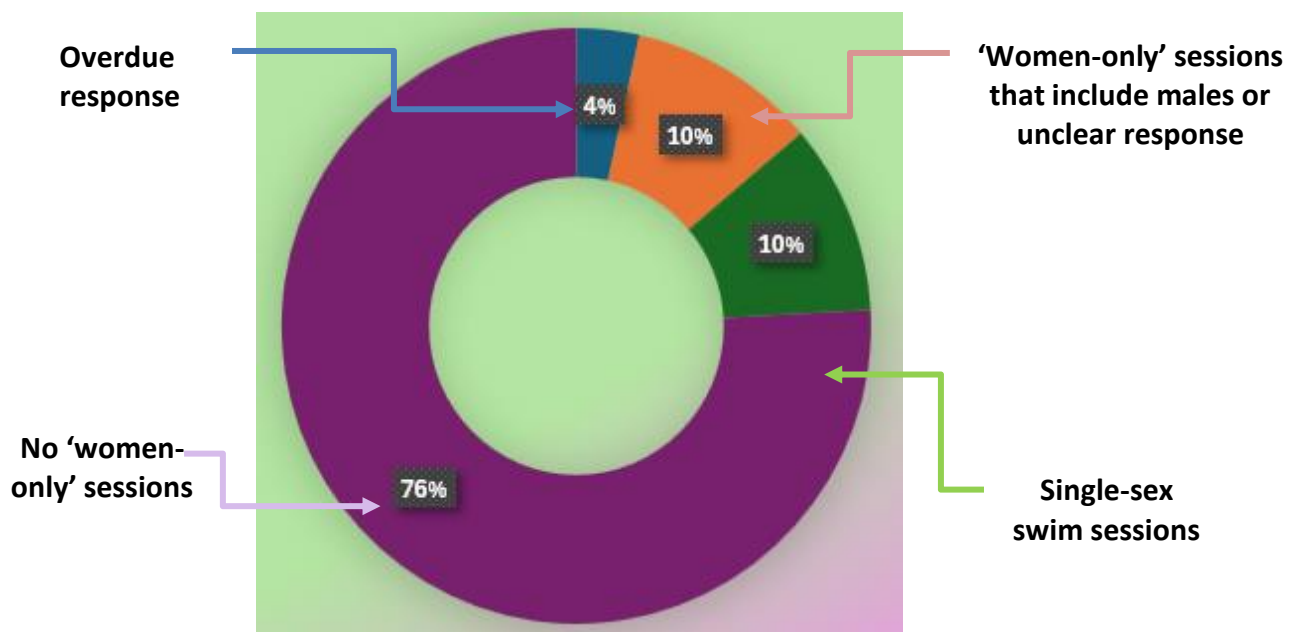
- Out of a total 256 local authorities in England and Wales that responded with information, **77 (or 30%) have no (ZERO)** leisure facilities that offer single-sex wet-side changing facilities and showers.
- 100 answers were either unclear or did not differentiate between dry-side and wet-side provision; these answers are therefore categorised overall as 'unclear'.
- Only 16 (or 6%) answered clearly that single-sex wet-side changing areas and showers are available in at least one facility within their local authority.

30% of local authorities in England and Wales provide no single-sex changing areas and have only mixed-sex village-style changing areas for swimming pool-users.

Scotland

- 32 FOI requests were sent to local authorities in Scotland (or their commercial operators or Trusts). 31 responded with one long overdue (Aberdeen Sports Village Limited).
- Six of the 31 local authorities provide 'women-only' or ladies-only' swimming sessions.
- **Only three (10%) are guaranteed to be single sex sessions.**
- Of the 3 authorities in Scotland with a single-sex swimming session, **one** has a specific policy on access for men who self-identify as women which is based on the Equality Act 2010.

In total, 4 out of 6 facilities in Scotland that offer 'women-only' or 'ladies-only' swimming sessions do not give staff access to a specific policy for the admission of males who identify as women.



*Figure 2: FOI investigation into the provision of Women-only swimming sessions
Data for Scotland*

Changing facilities, toilets and showers:

- Of the 31 respondents in Scotland, a total of 11 authorities **have no (zero)** leisure facilities that offer single-sex wet-side changing facilities and showers.
- Of 31 respondents, 13 answers to question 4 were either 'yes' (unclear) or did not differentiate between dry-side and wet-side provision; these answers are therefore categorised as 'unclear'.
- Of 31 respondents, 6 answered that single-sex wet-side changing areas and showers are available in at least one facility within their local authority.

In Scotland, 35% of local authorities provide no single-sex changing areas and have only mixed-sex village-style changing areas for swimming pool-users, which is a similar proportion to that in England and Wales (30%).

Northern Ireland

- 11 FOI requests sent to local authorities in Northern Ireland with a 100% response rate.
- **None (zero)** of the 11 Councils in Northern Ireland provide a swimming session advertised as 'women-only' or 'ladies-only'.
- There are no specific policies that cover women-only sessions in council-run facilities.

One of the 11 respondents clearly answered that they provided only mixed-sex village-style changing areas in their facilities. Another authority has three facilities, two of which have single-sex wet-side changing rooms and one is a village-style changing area. All the other answers indicated there were single-sex changing areas and showers but were unclear in terms of the differentiation between dry-side and wet-side provisions.

There is a huge gap in the provision of female-only swimming sessions and single-sex changing facilities in the UK.

In almost a third of all local authorities, women and girls are not able to go swimming without having to use mixed-sex changing rooms and showers.

Why women and girls need single sex provision

Privacy, dignity, safety

Since Victorian times women and girls have been able to enjoy female-only swimming sessions and changing facilities. Until recently it was a given that women and girls could have access to their own swim sessions, and there are numerous reasons why women and girls seek out female-only sessions:

- The freedom to exercise away from the male gaze;
- Religious / cultural requirements;
- Previous trauma;
- Lack of body confidence.

Women have told Women's Rights Network about their concerns over the lack of female-only swim sessions and the move by many providers to 'changing villages'. These 'villages' are mixed-sex changing areas that are open plan with lockable cubicles. Many have a large space above and below the partition walls and doors, which allow males to view women and girls while they change by, for example, putting a phone under the gap. Sport England recommends this format to Local Authorities.



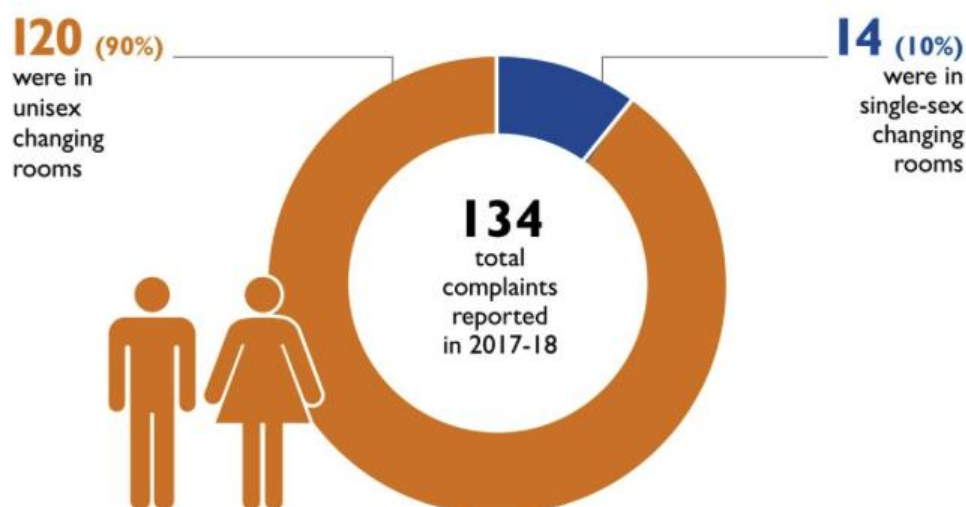
Example of a village-style changing area that Leisure centre refurbishment plans incorporate for their wet-side facilities.

Criminals exploit mixed-sex facilities

Village-style changing areas, the blueprint for all new swimming pools that replace ageing leisure facilities, are magnets for opportunistic males who are given free access to females in a state of undress.

The Sunday Times sent Freedom of Information requests to leisure centres and public swimming pools and found that of 134 complaints of sexual assaults / voyeurism in 2017-18, 120 originated from incidents occurring in mixed-sex facilities¹¹.

Changing room sex attacks in council sports centres or swimming pools



There are many more changing villages in 2024 than in 2018, so the problem is likely to be worse now. Women and girls give up recreational and sporting activities if they don't feel safe as reports from Fair Play For Women¹² and Sex Matters¹³ revealed in 2022.

Press reports confirm that women and girls are at risk in village-style changing areas. In Swansea, a 27-year-old male was convicted of voyeurism in a communal village-style changing area at the LC Waterpark. He was charged with 'observing a private act for sexual gratification' after he had followed a 15-year-old girl into the changing rooms and filmed her by putting his phone under the partition wall of the adjoining cubicle¹⁴. Similar incidents have occurred all over the country, e.g., Bakewell¹⁵, Bicester¹⁶, Leicester¹⁷, and a particularly nasty case occurred at pools across London and the South West of England where two men colluded to photograph at least 6,000 victims, including children¹⁸.

¹¹ <https://www.thetimes.co.uk/article/unisex-changing-rooms-put-women-in-danger-8lwbp8kgk>

¹² <https://fairplayforwomen.com/transgender-inclusion-is-already-harming-uk-females-in-sport/>

¹³ <https://sex-matters.org/posts/single-sex-services/why-single-sex-services-matter-privacy-dignity-safety-and-choice-2/>

¹⁴ <https://www.walesonline.co.uk/news/wales-news/chilling-moment-pervert-targets-girl-28374617>

¹⁵ <http://news.bbc.co.uk/1/hi/england/derbyshire/3523833.stm>

¹⁶ <https://www.oxfordmail.co.uk/news/16961457.voyeurism-bicester-swimming-pool-changing-rooms/>

¹⁷ <https://www.express.co.uk/news/uk/1754373/leicester-leys-leisure-centre-girl-assaulted-police>

¹⁸ <https://news.sky.com/story/two-men-who-secretly-photographed-thousands-of-people-including-children-getting-changed-at-swimming-pools-given-jail-sentences-13126086>

Yet Sport England, whose guidelines local authorities heavily rely on when planning new swimming pools and waterparks, promote village-style changing as the ‘preferred option’ while completely disregarding associated safeguarding risks or mitigation measures that might protect women and girls when vulnerable in a state of undress¹⁹, and ignoring how the vast majority of women feel about ‘gender-neutral’ changing areas.

According to Sport England, the aim of planning and building new leisure facilities is to increase participation in recreational activities; this will not be achieved if women are self-excluding from unpopular mixed-sex changing areas.



Image captured of changing village from CCTV that featured in the trial of a voyeur caught filming a 15-year-old girl in a Swansea leisure centre.

Health and well-being

Regular, low intensity physical activity is beneficial for women’s self-esteem and general quality of life. Female-only sessions provide a space where it is possible for women to swim at a slower pace than men and form a network of friends. It is an essential service for women who have suffered from the trauma of domestic and / or sexual abuse, and women who need an environment that guarantees the exclusion of males for religious or cultural reasons.

¹⁹ <https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/swimming-pools-dgn-2013.pdf?VersionId=uGFhoEkDP9PILA6D4psW9SPUYFHv21mv>

Anti-social behaviour

Women report significant levels of anti-social behaviour from males in mixed-sex swimming sessions ranging from unsolicited attention and unwanted physical contact to aggressive behaviour²⁰. Ellie Mae O’Hagan wrote about sexist behaviour in The Guardian in 2019, that men often react badly to a woman overtaking them or swimming more slowly than them²¹.



Both sexes prefer single-sex changing facilities

A 2022 survey by Sex Matters²² found that of 5,559 women and 554 men who said that single-sex services are important to them, 98% wanted to be able to change, shower and use the toilet in privacy, away from members of the opposite sex.

Experiences of sexual assault were reported:

“I was assaulted by a man in a swimming changing room when I was 11-years-old. He was entitled to be in the mixed-sex changing room. He followed me in and there wasn’t another person around to help me or question why he was there.” Female, England, 35–44

“I was assaulted in 9ft of water in a swimming pool at 14 whilst the lifeguard looked on. At least when it was over I could change in the women’s changing rooms. I stopped swimming after that.” Female, England, 55–64

²⁰ <https://www.mumsnet.com/talk/feminism/4772672-male-behaviour-in-swimming-pools>

²¹ <https://www.theguardian.com/commentisfree/2019/may/07/swimming-sexist-behaviour-british-pools-male-swimmers-men>

²² <https://sex-matters.org/posts/single-sex-services/why-single-sex-services-matter-privacy-dignity-safety-and-choice-2/>

Women self-exclude from swimming sessions that include males:

“The changing areas in nearby swimming baths are now all mixed sex, with individual cubicles. I do not feel safe or comfortable there. There are no longer single sex showers. There are instead open communal showers. I no longer use the swimming pools.” Female, England, 55–64

“I am Muslim and would not undress or shower if there were males present. This would severely limit my ability to access sports and leisure facilities. Essentially it would mean there would be activities that I now could no longer participate in. We should be encouraging more women into exercise, not less participation of women from different ethnic/religious backgrounds who traditionally don’t access sport as much and would effectively cut off from doing so. I have always wanted to try open water swimming in a safe environment e.g. the pools at Hampstead Heath but I can never do so as these are effectively mixed sex.” Female, England, 45–54

WRN Demands

This Freedom of Information research has laid bare the lack of opportunity for women and girls to access single-sex swimming sessions in the UK. It has also exposed the extent of mixed-sex changing facilities that put women and girls at risk of sexual assault, voyeurism and anti-social behaviour.

Women’s Rights Network demand that local authority providers:

- **Prioritise** safeguarding and provide adequate risk assessments and public consultation if considering village-style changing rooms.
- **Protect** the safety, dignity and privacy of women and girls with lawful policies and guidance.
- **Train** staff in the Equality Act 2010 so that they understand women and girls have a legal right to single-sex facilities.
- **Be clear** about sessions that are advertised as women only or girls only – they must only accept females using a definition based on sex.

Appendices

Appendix A - Policies by Provider in England and Wales

UKActive

The contractor UKActive has developed their own Transgender policy²³, available online, with guidance for staff should a male presenting as a woman request access to women-only sessions and changing areas, which requires the decision of a manager on a case-by-case should a concern or issue arise. South Ribble Borough Council provided a document with a flow-chart of decision-making for “Trans Customers” very similar to that of UKActive.

EveryoneActive

Everyone Active has published a non-specific ‘Equality and Diversity Policy’ with no direct guidance for staff or the public on how they would deal with access to their women-only swimming sessions²⁴. We received a generally standardised company statement from Everyone Active-run facilities in response to the FOI requests, for example:

“In line with the leisure operator’s equality and diversity policy, an individual wishing to attend a session should contact the General Manager to discuss their needs and the best way to support them to get active.”

Fusion Lifestyle

There is nothing specific on the Fusion Lifestyle website. We received a response that stated:

“Where a trans customer wishes to attend a sex-segregated session, this should be accommodated where possible, unless there is a specific reason why this is not appropriate and there is no other way of accommodating all parties’ needs”, according to the Common Council of City of London.

It is clear therefore, that for the above-mentioned operators, eligibility for access to women-only swimming sessions is based on a subjective assessment of acceptability on a case-by-case basis by a manager, which disqualified all facilities run by these two organisations from the category providing single-sex swimming sessions as there is no certainty that males will be excluded.

Chelmsford City Council

Chelmsford City Council provided us with a detailed, thoughtful and balanced statement on Single Sex Provision, published July 2023 and available on request, quoting guidance from the Equality and Human Rights Commission (EHRC) and the Equality Act 2010 that allows the provision of separate or single-sex services in certain circumstances, including the possibility to exclude, modify or limit access to those with the protected characteristic of gender reassignment.

The statement points out that facilities are objectively justified to discriminate on the grounds of low participation, citing the various schemes and campaigns aimed at increasing participation of women and girls in sport and physical activity, tackling barriers due to religious and cultural beliefs, lack of confidence, body image issues and fear of judgement (particularly relevant in gym and pool environments), privacy and decency concerns, as well as sexual harassment and intimidation when dressed in clothes suitable for that activity, such as swimwear.

²³ [Transgender Guidance \(ukactive.com\)](https://www.ukactive.com/transgender-guidance)

²⁴ <https://www.everyoneactive.com/legal-policies/equality-and-diversity-policy/#:~:text=We%20do%20not%20discriminate%20on,belief%2C%20sex%20or%20sexual%20orientation.>

Appendix B - Freedom of Information Investigation

We sent Freedom of Information (FOI) requests to ALL Local Authorities in England, Wales, Scotland and Northern Ireland. We asked four questions:

1. Please list all council-funded public swimming pools that provide 'women-only' or 'ladies-only' (or similarly described) swimming sessions in your local authority.
2. Which of the listed facilities that advertise 'women-only' or 'ladies-only' (or similarly described) swimming sessions, provide an environment that is exclusively single sex, i.e., for females only, and which facilities provide a session that is mixed sex, i.e., do not exclude males who identify as a woman?
3. Please send me a copy of the council policy or policies that cover the provision of 'women-only' or 'ladies-only' (or similarly described) swimming sessions.
4. Please tell me, do the council-funded leisure centres and sports facilities provide single sex changing rooms and showers in your local authority?

Data and Results

All submitted FOI requests and the responses used to compile this report are publicly available and can be found by searching the WhatDoTheyKnow database.

A summary of the collated responses is presented in **Table 1**.

Many councils have handed over the responsibility of running leisure centres to private companies or Trusts. In some cases, these councils endeavoured to answer at least one of the questions and in others they have responded by stating that the information is not held.

To get an accurate picture of changing areas and showers for swimming pool-users in leisure centres, Question 4 (Please tell me, do the council-funded leisure centres and sports facilities provide single sex changing rooms and showers in your local authority?) should have been more precise and asked about the provision of single-sex facilities on wet-side areas, and provision of single-sex facilities in dry-side areas of individual centres. Respondents often replied simply 'yes' or provided the names of facilities that offer single-sex changing rooms and showers without qualifying whether they are available on wet-side or dry-side areas; these answers are therefore included in the data as 'unclear'.

Where 'women-only' or 'ladies-only' swimming sessions are available, intelligible responses to the question of how 'women-only' or 'ladies-only' swimming sessions are defined in terms of those allowed to participate can be provided on request; some examples are:

"Our ladies only sessions provide an environment for single sex including anyone who identified (sic) as a woman", Blackburn and Darwen Borough Council.

"Both pools provide Ladies only swim sessions which include anybody who identifies as female", Broxtowe Borough Council.

"Sowerby Bridge Pool and Fitness Centre currently allows males who identify as women", Calderdale Metropolitan Borough Council.

"All those who identify as women are able to access these sessions", Gloucester City Council.

LEISURE CENTRES: PUTTING WOMEN AND GIRLS AT

Table 1: Overall summary of responses from individual local authorities to an FOI submission on ‘women-only’ or ‘ladies-only’ swimming sessions and changing room provisions

Country	Total number of authorities / Number of non-respondents^a (% non-respondents)	Number of authorities citing information not held^b	Number of authorities that do have at least one women-only swim session	Number of women-only swim sessions that are guaranteed to be single-sex^c (Number with a specific policy)	Overall number of authorities with a specific policy^d for women-only swim sessions	Number of authorities that DO NOT offer single-sex wet-side changing facilities^e (Number of unclear responses)
England and Wales	338 (0%)	82 / 338	133	25 / 133 (0 / 25)	31 / 133	77 / 256 (107 / 256)
Northern Ireland	11 (0%)	0 / 11	0	-	0 / 11	1 / 11 (6 / 11)
Scotland	32 / 1 (3.1%)	19[†] / 32	6	3 / 6 (0 / 6)	2 / 6	11 / 31 (13 / 31)

^aLong overdue responses at the time of publication

[†]Local authorities directed us to the company that runs their facilities (n=19), 18 out of the 19 companies have responded to the FOI questions at the time of writing

^bInformation not held due to contracting out services to private companies; some councils did seek and obtain the FOI information from the private companies, and this information is included in the overall data

^cIncludes single-sex sessions that may have male lifeguards depending on staffing levels

^dDoes not include EqA 2010 due to varying interpretations

^eChanging village = mixed sex

The **Women's Rights Network** (WRN) is a rapidly growing grassroots network of women from England, Wales, Scotland and Northern Ireland whose primary focus is to defend the sex-based rights of women

