

The standards crisis in Rape Crisis

An analysis of the compatibility of gender-identity ideology with the national standards for rape-crisis centres



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Introduction

Rape-crisis centres were established from the 1970s onwards, alongside women's refuges and domestic-violence services. They were run by women for women, inspired by a feminist concern about male violence against women. Yet 40 years later many started to adopt the idea that being male or female is not an important factor in life, and that these categories can be replaced by subjective declarations of gender identity. It followed that men who identified as women should be included as women in rape-crisis centres, as service users, volunteers, staff and board members.

Women who raised concerns about this were dismissed as "transphobes", "bigots" and "TERFs".

In May 2024 Edinburgh Rape Crisis Centre (ERCC), a centre that subscribed to the gender-identity approach, faced a damning judgment from the Employment Tribunal in the case of *Roz Adams v ERCC*. This exposed failings in governance, operations and culture.¹ Following the judgment, together with the umbrella body Rape Crisis Scotland (RCS), the centre commissioned an independent review of its own compliance with the Rape Crisis National Service Standards.² This produced a further damning analysis, which led to the resignation of ERCC's CEO, Mridul Wadhwa, and a commitment to do better.

During the tribunal RCS had tried to distance itself from practices at ERCC. ERCC was an autonomous member centre, RCS insisted, and as such, RCS was not involved in any of the circumstances leading to the tribunal. It emphasised the national standards, which it said ensured that centres were survivor centred and trauma informed, and met survivors where their needs are.³

The independent review assessed ERCC against the standards and raised the question of how the centre defined women. But it did not fully explore whether ERCC's assertion that "trans women are women" was compatible with survivor-centred, trauma-informed and women-led provision, or indeed how "woman" was defined in the standards. Instead, it said:

*"It is not the role of this review to take a position on these issues."*⁴

This report considers those unanswered questions.

¹ [Adams v Edinburgh Rape Crisis Centre UKET \[2024\] 4102236/2023](#).

² Vicky Ling (2024). [Edinburgh Rape Crisis National Service Standards Report](#).

³ Rape Crisis Scotland (2024). [Our statement on the ongoing employment tribunal concerning Edinburgh Rape Crisis Centre](#).

⁴ [Adams v Edinburgh Rape Crisis Centre UKET \[2024\] 4102236/2023](#).

The ERCC case and its implications

Grassroots women's groups have been raising concerns about the impact of gender-identity ideology on women's services for years.⁵

Adams' case brought the issue to public attention. The employment tribunal said that an "extreme gender identity belief" was pervasive among the senior management of ERCC. The three members of the respondent's board and the sole manager who gave evidence were all strong believers in gender-identity theory. The tribunal found:

"They do not believe that sex is immutable. It is their view that a trans woman is a woman and that biological sex is not relevant. They do not believe that sex is binary but believe that it is possible for an individual to be non binary."

When Adams, a rape counsellor, raised concerns about whether this approach served the needs of female survivors of male violence she was subjected to an investigation that was "intimidating, hostile, degrading, humiliating and offensive".

Adams is not alone in her experiences. Sex Matters has previously published research highlighting the experience of sector leaders who have faced grievances based on claims that they are "transphobic" for trying to protect female-only services.⁶

The independent review of ERCC following the tribunal judgment was undertaken by lawyer Vicky Ling. She concluded that there were serious problems at ERCC. The centre lacked focus on the core standards; did not put survivors first; failed to protect women-only spaces; had poor systems, procedures and document control; suffered from weak governance; and had a CEO, Mridul Wadhwa, who did not understand the limits on a CEO's authority and who failed to set professional standards of behaviour.⁷ But Ling did not question the fundamental approach of including trans-identifying men in women's services and treating them as women (including by employing a trans-identifying man – Wadhwa – as CEO when the job had been advertised as being restricted to female candidates).

The independent rReview said that the "ERCC must take advice from RCS concerning the definition of 'woman' within its service". But it is clear that senior leadership at ERCC believed that their philosophy and practice, and their consequent treatment of Adams, were in line with the approach of RCS, mainstream civil-society organisations and the Scottish

⁵ FOVAS (Female-Only, Violence and Abuse Survivors) (2018). [*Open letter to UK Women's Organisations from female survivors of male violence*](#).

⁶ Sex Matters (2024). [*Women's services: a sector silenced*](#).

⁷ Vicky Ling (2024). [*Edinburgh Rape Crisis National Service Standards Report*](#).

Government. Wadhwa wrote to the Scottish Government in April 2023 dismissing Adam's case as having "roots in the hostile environment that is being created for charities that are openly trans inclusive".⁸

After the independent review, Wadhwa finally resigned. In a statement, ERCC's board said: "We recognise that we got things wrong. We are sorry. We are committed to putting things right and implementing the recommendations in the report".⁹ RCS said: "As soon as we became aware of concerns about practice at ERCC, we acted on them. We will be working with ERCC to ensure the recommendations are implemented."¹⁰ The Scottish First Minister, John Swinney, responded to the investigation, saying that "the ability to have women only spaces is central to... the Equality Act... it's a position that must be protected and implemented effectively... the safety of women and girls must be protected at all times."

But grassroots campaigners and survivors of sexual violence say this is not possible unless organisations, regulators, funders and commissioners recognise that women as a group do not include trans-identifying men. The grassroots group For Women Scotland said of the CEO of RCS:

"Sandy Brindley has been repeatedly warned by women in the Rape Crisis Network, by survivors, and by women's rights organisations that self-ID policies were reckless and cruel. Nevertheless, she insisted – including to a group of survivors – that men were women if they claimed a female identity, she vigorously defended Mridul Wadhwa who conducted the heresy hunt in ERCC, and she presided over the introduction of policies which included trans-identified men in women only services. In several Parliamentary appearances, she claimed that these policies did not create any problems in running rape crisis services. That has now been exposed for the lie it always was."¹¹

⁸ The Scottish Government (2024). [Redacted version of information to release. FOI 202400416898](#).

⁹ Edinburgh Rape Crisis Centre (2024). [Statement from Edinburgh Rape Crisis Centre Board of Directors](#)'.

¹⁰ Jennifer Hyland (2024). [Rape Crisis Scotland boss unaware of calls to quit over support service scandal](#), *Daily Record*.

¹¹ For Women Scotland (2024). [FWS Statement on Edinburgh Rape Crisis Centre](#)'.

The Rape Crisis National Service Standard

The Rape Crisis National Service Standards framework (RCNSS) was developed in 2008 by Rape Crisis England and Wales, and Rape Crisis Scotland. It is a quality-assurance framework that enables specialist rape crisis services to demonstrate how their services prioritise safety, governance, empowerment and continuous improvement. Central to the guidance are principles of informed consent, safety, dignity and empowerment of women and girls.

The standards framework has been welcomed by the Care Quality Commission and the Care Inspectorate Scotland. It has been integrated into the Sector Sustainability Standards that apply across the Violence Against Women and Girls sector in England and Wales, which was developed by Rape Crisis England and Wales, Imkaan, SafeLives, Respect and Women's Aid (England). The RCNSS framework is due to undergo a planned review and refresh.

The standards provide the basis for a quality mark and accreditation system. They set out what makes specialist services by and for women different from generic support services. These differences include the values and ethos that underpin specialist services' work. Although the standards refer to services being for women and women-led, they do not provide a definition of the term.

The core standard is that the organisation is defined as a Rape Crisis Service and adheres to the membership criteria of Rape Crisis England and Wales, or those of Rape Crisis Scotland. These require the organisation to be:

1. **A registered charity or not-for-profit** that adheres to the principles and expectations of the relevant charity regulator
2. **Directed at delivering services to women and girls** who have experienced any form of sexual violence at any time in their lives
3. **Women-led** and committed to remaining women-led
4. **Dedicated to meeting the needs of survivors** in their area who have experienced any form of sexual violence at any time in their lives
5. **Underpinned by a feminist perspective** that recognises sexual violence as a crime of violence, as an abuse of power, and as a cause and consequence of gender inequality
6. **A female-only service** provider offering dedicated spaces and times for women and girls to access services
7. **Committed to anti-racism** and working towards or already taking an actively anti-racist approach to working with survivors, staff and volunteers.

The assessment is based on four standards: **strong leadership and governance**; **responsiveness to the diverse needs of survivors**; **safe practice**; and **wider impact** that supports survivors to regain control in their lives and actively challenges social tolerance of sexual violence. Each individual section contains four core standards and there are up to four core indicators under each standard. The total number of indicators is 61.

The National Service Standards provide a quality-assurance framework to support better practice and continuous improvement, and to communicate this to funders and commissioners. They underpin rape crisis and women's services, seen as a system. Individuals may be referred between services; staff move as their careers progress; data is collected across the system; and the umbrella organisations advocate for their members.

What is “trans inclusion”?

Organisations may operate a policy that includes transgender people in several different ways. Some rape-crisis centres explicitly provide services for children and young people of both sexes, as well as men, alongside their core services for women and girls. Men who identify as women can be accommodated within these separate services.

Until 2014 RCS followed this model, recognising the need for female-only services with female staff. But from 2014 onwards it began to promote full “trans inclusion”, by which it meant including men who identify as women as users, volunteers, staff and trustees of services advertised as “women-only”.¹² This is the approach taken by ERCC. It says:

“Everyone should be free to express their own identity with dignity. ERCC operates on the basis of self-declaration and has done so since 2008. Recognising trans and non-binary people on a self-identification basis is key to our feminist principles in which we support people of marginalised groups to have full autonomy over their rights, identities and bodies. Our service is open to anyone who self identifies as a woman, trans woman, trans man or non-binary person. We offer a person-centred service to all survivors of all genders who use our service.”¹³

Organisations that apply for support from the Scottish Government’s Equally Safe fund are required to show that they “ensure that [their] service is inclusive to lesbian, bisexual, trans

¹² Heal survivors’ group (2022). *Letter in response to the Stage 1 report on the Gender Recognition Reform (Scotland) Bill*.

¹³ Edinburgh Rape Crisis Centre. ‘[Trans inclusion statement](#)’ (accessed September 2024).

and intersex (LBTI) women”. They must submit an inclusion plan along with their application.”¹⁴ RCS and other Scottish civil-society organisations say:

“The requirement for trans inclusion plans has been in place for six years, and has not given rise to any concerns or challenges of which we are currently aware. Rather, trans women have added to our movements through their support, through volunteering, and as staff members of our organisations.”¹⁵

Rape Crisis England and Wales says that member organisations may choose to provide “women only” services on the basis of either biological sex or gender identity.

For Women Scotland has collected submissions on trans inclusion from organisations applying for Scottish Government funding. They are usually short on detail, simply referring to the existence of policies and to training. Here are examples:

“Moray Rape Crisis is committed to ensuring that our trauma-informed support is inclusive for LBTI women who have experienced sexual violence...as we also work with male survivors, we offer women survivors access to women-only spaces for support, which are fully inclusive of trans women.”¹⁶

“We have a code of conduct which clearly outlines our core ethos and values, including explicit reference to our transinclusive values. We have faced, as an organisation, and a network, significant external hostility for this, and we will continue to adhere to these values, and ensure a space which is safe, inclusive, and accessible for all women.”¹⁷

“RASAC P&K advertises its services in leaflet form and on our website and Facebook pages as being available to anyone who identifies as a woman aged 12+. Furthermore, our website has a dedicated section with resources and information for survivors from the LBTI community.”¹⁸

¹⁴ For Women Scotland (2019). [‘Equally Safe funding conditions’](#).

¹⁵ Engender (2017). [Frequently asked questions: Women’s equality and the Gender Recognition Act](#).

¹⁶ Moray Rape Crisis (2021?). [‘Lesbian, bisexual, trans and intersex Inclusion Plan’](#).

¹⁷ Lanarkshire Rape Crisis Centre (2021?). [‘Lesbian, bisexual, trans and intersex Inclusion Plan’](#).

¹⁸ Rape and Sexual Abuse Centre, Perth & Kinross (2021?). [‘Lesbian, bisexual, trans and intersex Inclusion Plan’](#).

“We have a clear policy framework with our equality and diversity policy and our current practice is based on RCS’ trans inclusive policy, which was developed in conjunction with the Scottish Transgender Alliance and is held up as an example of good practice.”¹⁹

Many say that they are working towards or have already received accreditation under the LGBT Youth charter scheme to bronze, silver or gold level.²⁰ This scheme is based on the same “extreme gender identity belief” that the tribunal observed at ERCC. ERCC had been awarded the gold standard and had been lauded for demonstrating “multiple exemplary practices”.²¹

The scheme’s criteria are not published, but in 2011 a consortium of voluntary-sector organisations, with funding from the Scottish Government, produced *Stronger Together: Guidance for women’s services on the inclusion of transgender women*. This was updated in 2015.²² Although this guidance is not formally endorsed by RCS, many rape-crisis centres seek accreditation from LGBT Youth Scotland (including RCS in the past). The guidance is therefore the clearest articulation available of what is being promoted in Scotland as best-practice trans inclusion.

The LGBT Youth Scotland guidance, which underpins its charter scheme, makes detailed recommendations that are very similar to the way ERCC operated, as revealed in Adams’ case. This approach takes “gender identity” as the only legitimate conceptual framework for talking about women and men, and insists that information about people’s sex be kept confidential.

Trans-inclusion recommendations of LGBT Youth Scotland Guidance²³

Provision of service to “trans women” (i.e. men who identify as women)	A women’s only organisation should provide a trans woman with the same quality of service they would provide to a non-trans woman. It would not be acceptable to refuse to provide a service to a trans woman because she is trans.
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¹⁹ Shetland Rape Crisis (2021?). ‘[Lesbian, bisexual, trans and intersex Inclusion Plan](#)’.

²⁰ <https://drive.google.com/drive/folders/1sTLYnl7ofixRMtV3uC1YizYIsunVp4te>

²¹ Edinburgh Rape Crisis Centre (2020). ‘[LGBT Charter Gold Award](#)’.

²² LGBT Domestic Abuse Project et al (2015). *Stronger Together: Guidance for women’s services on the inclusion of transgender women*.

²³ LGBT Domestic Abuse Project et al (2015). *Stronger Together: Guidance for women’s services on the inclusion of transgender women*.

	<p>It is helpful to think from a flexible person-centred position of how individuals can be included in appropriate service provision rather than focusing on defining rigid requirements for access to your service. What is important is not to automatically exclude someone from service provision just because they are not living as a woman in all aspects of their life. Rather than focus on where someone is in their transition, it can be more helpful to provide your service based on how individuals identify their gender identities.</p>
<p>Provision of service to “non-binary” people (i.e. men or women who identify as non-binary)</p>	<p>Since non-binary people do not identify as men, it can be easier to include them than it is to include trans men within women’s services. In light of this we would strongly encourage women's services to look at the ways that they could include all transgender people within their services to ensure that all transgender people who experience GBV get the support that they need and deserve. Services would need to ensure that the reason for this provision is made clear within their policies and that staff are clear about why this policy is in place.</p>
<p>Provision of service to “trans men” (i.e. women who identify as men)</p>	<p>Someone who identifies as a trans man may no longer feel comfortable accessing a service that is for women once he has started his transition to live as a man, so be informed about other options in the area and listen to how the service user feels and what he wants and needs.</p> <p>Many trans men, especially men who are in the early stages of their transition may feel that a men’s service or accommodation would not feel safe to them. It is therefore important to listen to the concerns and needs of the service user. Could you still offer support, but in a different way? This could be done by offering individual, rather than group support or providing support in a different location. Could your service think about providing a service to all transgender people, including trans men?</p>
<p>Asking, recording and sharing information</p>	<p>If a person is accessing a women-only service, wearing clothing typically associated with women and using a feminine name it is likely that they identify as a woman. Many transgender women will mark their transition by beginning to use a typically female</p>

	<p>name. This can be one way to recognise someone’s gender. If someone’s voice, bone structure or other aspects of their physical body appear androgynous or masculine, this should not be used to undermine her gender identity as a woman.</p> <p>If practitioners are in any doubt as to someone’s gender identity, they should ask the individual politely and discreetly whether they prefer female, male, or gender neutral pronouns.</p> <p>Good practice would be to not ask directly whether a service user is a trans person, but to make it clear to everyone that your service is trans inclusive.</p> <p>[S]ervice users should not be asked to provide any other evidence of their gender reassignment history, such as medical information or name change documents.</p> <p>This means that as soon as your service user advises you of their change in name and/or pronouns, you must refer to them and document details of them as such in your records. It is not usually necessary to record any details of someone’s gender reassignment history or trans status in records, and this should only be done for specific support reasons with the full permission of the service user. This information must be treated as strictly confidential, and services must show that they have ascertained that the fewest possible relevant people will come into contact with this information.</p> <p>This information should only be shared with other service users following consultation with the trans service user regarding their own safety and comfort, and it would not be legal to do without explicit consent from the service user.</p>
<p>What if women are uncomfortable?</p>	<p>Any person who identifies as a woman and is living fully as a woman should not be differentiated from other women on the basis that she has a trans history.</p> <p>Where a trans woman is still in the process of transitioning, then there might be rare occasions requiring a service to be provided</p>

	<p>differently to her.</p> <p>'[B]lanket' bans or policies barring people from accessing services are not acceptable.</p> <p>[I]n the circumstance that other service users say that they are uncomfortable sharing a service with a trans woman, this is rightly seen as no reason for the trans woman to be moved.</p> <p>In this situation, we would work to educate other service users – much in the same way that we would if we received comments regarding other service user's ethnicity, religious affiliation or sexual orientation.</p>
Informing others	<p>Difficulties for newly arriving service users could be prevented through some proactive measures. For example, the intake procedure at some women's refuges includes informing new residents of the following: 'We house many different women here. We welcome women of different races, different religions, women with mental health issues, lesbian and bisexual women, and transgender women'. This discussion would be held irrespective of whether any trans people were in the service at that point.</p>
Recruiting staff	<p>It should not be expected that applicants and interviewees for employment would wish to disclose their trans status or gender reassignment history. There is no obligation for a person to disclose their trans status or gender reassignment history as a condition of employment.... It is not a question that should be asked at interview, as it is not a relevant criterion in selection.</p> <p>If they choose to disclose, this is not in itself a reason for not offering employment and nondisclosure or subsequent disclosure are not grounds for dismissal. If Human Resources/Personnel departments or local administrators are informed of the individual's trans status or gender reassignment history, they should not disclose this to the members of staff leading the recruitment, as this is not relevant information to the selection for the post.</p>
Can men who	<p>Yes... a trans woman who lives as a woman should be allowed to</p>

<p>identify as women work in women's only organisations?</p>	<p>work in a women's only service. If someone has a gender recognition certificate then they must be treated in exactly the same way as any other woman who is applying for a post in a single-sex service.</p>
<p>Maintaining records and sharing information about staff</p>	<p>Records maintained on the personnel file should not overtly refer to a previous name, and records made prior to name change should be updated if appropriate.</p> <p>Whether or not a person has applied for a GRC, inappropriate disclosure of their gender history without their permission is a form of unlawful harassment under the Equality Act 2010.</p> <p>Disclosing a person's trans history to co leagues or service users without the trans person's consent can be unlawful gender reassignment harassment and if the trans person has a gender recognition certificate then it can even be a criminal offence. The trans person should be supported by management to decide to whom their trans history is disclosed.</p>

The guidance justifies this approach by pointing to the Equality Act, and saying that there are high legal barriers to operating a truly single-sex service:

“People who provide separate and single-sex services, such as refuges, can only provide a service differently to a trans woman in a way which is less favourable compared to other women under exceptional circumstances. These circumstances depend on the facts of the individual case – this means that ‘blanket’ bans or policies barring people from accessing services are not acceptable.”

In fact the Equality Act does not demand “exceptional circumstances” for providing a female-only service, and gives a rape-counselling service as a specific example for this.

The tribunal in the Adams case said that “there may well be a place within a Rape Crisis Centre for those who hold both philosophical beliefs. It is very likely that a Rape Crisis Centre will find itself dealing with service users who hold both sets of beliefs.... Essentially our view of the law is that the law imposes a duty on both sides to tolerate each other in the workplace.” But it also considered that this belief did not mean a right of confidentiality over a staff member’s “gender history” in the context of working in a rape-crisis centre. “In the

view of the Tribunal there is absolutely no breach of [the staff member's] right to privacy in those circumstances.”

Assessing the Rape Crisis National Service Standards

The Heal survivors' group has argued that RCS itself promotes policies that are irreconcilable with RCS's National Service Standards.²⁴

At the most basic level, without clarity about what is meant by “women”, it is impossible for any organisation or independent reviewer to judge whether a service is meeting the core standards concerning women-only services and spaces, and being women-led.

Other areas covered by the standards, such as safeguarding, risk assessment, data protection and systems for learning, depend on clear expectations, candour, accuracy and clarity. These are likely to be undermined by conflating sex and gender identity, or introducing extreme confidentiality provisions about any individual's sex.

We consider three models for a rape-crisis centre or other VAWG organisation and how they interact with the standards.

1. **Model 1: ideologically committed.** The organisation has a historic mission and purpose to serve women, but now interprets “women” to include men who identify as women. It refers to and records only stated gender identity and does not routinely record or refer to sex. All users are told that services for women are for “self-identified women”. Men who identify as women (or as non-binary) are included as service users, staff or volunteers alongside and in the same way as women in times, places and roles that are advertised as “female-only”. This policy is included in all staff training. (This is the approach taken by ERCC and is in line with LGBT Youth Scotland guidance).
2. **Model 2: Pragmatically vague.** The organisation has a historic mission and purpose to serve women, and senior leaders continue to pursue this mission but are afraid to say so clearly. Its policies are not explicit and clear whether “women-only” means female or includes trans-identifying men. Its commitments regarding equality are expressed in vague terms such as inclusion of “LGBTI women”, while senior leaders make case-by-case decisions which recognise biological sex. In practice, key members of staff recognise that “trans women” are male, and seek to direct male

²⁴ Heal survivors' group (2022). *Letter in response to the Stage 1 report on the Gender Recognition Reform (Scotland) Bill*.

survivors to appropriate services without being explicit or writing down policies or decisions for fear of being targeted by activists or losing funding. Staff training on this topic is vague and fraught.

3. **Model 3: Clear and explicit.** The organisation has a clear mission and purpose to serve women, and when this became controversial it took steps to make its policies explicit. It states publicly and clearly which of its services and employment or volunteering roles are female-only and which are open to either sex. It is clear that its mission is to serve women and girls. It may also provide services for men and boys (including services for those with a transgender identity), but these are separate from its women-only services. It records the sex of individual users, staff and volunteers in every situation where sex is relevant. This policy is included in all staff training. (This is the approach taken by nia and Aurora New Dawn, and is set out in the Sex Matters model policy.²⁵)

RCS promotes model 1 (although some member organisations may be quietly operating model 2). Rape Crisis England and Wales says that organisations may choose between model 1 and model 3.²⁶ In practice, most appear to be operating model 2. The overall approach of Rape Crisis England and Wales is model 2.

The RCNSS framework has 61 indicators. Overall we find that the ideological model fails on 51 indicators. The vague model fails on four, with risks across 31 (see Annex 1).

	Model 1: Ideological	Model 2: Vague	Model 3: Clear
0. Core service by and for women	six failures	five risks	
1. Strong leadership	fifteen failures	one failure eight risks	
2. Responsive to survivors	eleven failures one risk	one failure six risks	one risk
3. Safe practice	eleven failures	one failure nine risks	
4. Lasting impact	eight failures	three failures one risk	three risks

²⁵ Sex Matters (2021). *Single-sex services: model policy*.

²⁶ Rape Crisis England and Wales. *'Women-only services'* (accessed September 2024).

The adoption of gender-identity ideology by a rape-crisis centre that operates within a network creates risks for those centres operating under the third model. Even though they are using clear language and categories on sex, they are interacting with other services that are referrals, data collection, training, career and funding frameworks.

A charity that was set up for women but now operates under the ideologically committed model adopted by ERCC and RCS will fail against the standards in multiple ways. The key failures include:

Specialist service provision

- Failing to remain centred on women, and therefore failing to pursue its charitable objects.
- Being willing to appoint men who identify as women as board members or leaders, and perhaps already having done so. This means it is not women-led.
- Failing to recognise the needs of survivors who want a female-only service (such a centre is likely to call those survivors “transphobes”).
- Failing to recognise that men who force or coerce their way into women’s spaces or ignore women’s consent are committing abuse.
- Failing to provide “women-only” services.

Strong leadership

- Providing services for “self-identified women”, meaning that its aims and objectives conflict with its charitable objects to support women.
- Replacing sex with gender identity, and therefore being unable to recognise a category of abuse committed by men towards women. The result is an institution that abuses those it was set up to protect.
- Having a strategic plan that cannot be aligned with supporting services that centre women.
- Ignoring the protected characteristic of sex in favour of gender identity, which means misinterpreting the law and thereby being led to breach professional and ethical frameworks, health and safety standards, and the Equality Act.
- Having trustees who do not understand their responsibilities in governing a charity for women.
- Having trustees who are unable to review internal and external developments related to sex and gender.
- Denigrating women who seek a female-only service as bigots.
- Distorting attempts to increase diversity or survivor representation by placing men who identify as women in positions as trustees, staff or volunteers.

- Discriminating against those who do not support gender-identity ideology.

Response to survivors

- Failing to understand sexual violence, since this is impossible without acknowledging the material reality of and differences between the two sexes.
- Offering services to a group concerning which it does not have appropriate expertise, namely trans-identifying men.
- Failing to consider the needs of women as a sex.
- Failing to gather and make use of robust data on sex.
- Collapsing distinct groups of people, who need different services and responses, into an inappropriate umbrella category of “LGBTQIA”.
- Potentially refusing to make referrals to a female-only service when that is what a service user needs.
- Potentially referring a male user to a female-only service.
- Encouraging children to be unclear about sex and pressuring them to accept that “trans women are women”, thereby weakening children’s boundaries and putting them at risk.
- Gaslighting users to ignore their own perceptions and fears.
- Presenting male staff and users as “female” and treating their sex as confidential. This means the organisation is unable to obtain informed consent from others.
- Ignoring the individual support needs of women who seek women-only services.
- Treating men and boys with a transgender identity as if they are women, which fails to recognise the specific needs of this group.

Safe practices

- Failing to robustly risk-assess and safeguard adults and children because of ignoring and misrecording sex.
- Failing to train staff effectively because of the use of gender-identity based language and categories, and viewing disagreement with these as “hostility”.
- Seeking guidance only from organisations that are ideologically aligned to gender identity; dismissing risks and concerns raised by non-ideologically aligned people and organisations as transphobia.
- Failing to have robust policies to protect staff in situations where sex matters. This can result in harassment of transgender staff as well as of gender-critical staff.
- Failing to have a culture of safe and reflective practice, since such a culture is impossible while ignoring and misrepresenting sex.
- Undermining professional boundaries by promoting a culture of open secrets, misrepresentation and coercion.

- Setting policies concerning confidentiality of information about people's sex that are inappropriate and unworkable, and that lead to inaccurate record-keeping and data analysis.
- Failing to record sex accurately, which makes it impossible to review and learn from incidents where gender-identity ideology conflicts with users' needs.
- Protecting gender-identity ideology from outside criticism, which is framed as transphobia and hostility. This undermines reflective practice.

Lasting impact

- Overlooking subgroups of minoritised female survivors, such as religious women, women with learning difficulties and disabled women, in favour of men who identify as women.
- Making it impossible for service users to give feedback or complain in clear, natural language.
- Treating disagreement with gender-identity ideology as "hostility" or hate.
- Selecting staff and trustees only from those who adhere to gender-identity ideology or are at least willing not to challenge it.
- Learning only from ideologically aligned sources.
- Reporting gender-identity data instead of sex-based data.
- Failing to demonstrate the availability of female-only services.
- Actively contributing to creating a hostile environment for women who seek to provide services that support female victims of male violence.

An organisation operating under the pragmatically vague model is trying to provide female-only services at the same time as saying that it is providing services that are inclusive of "transgender women" and avoiding stating explicitly that it does not view them as women. Although it may be possible for staff to make sensible and compassionate ad hoc decisions to be "trans responsive", and to provide separate services for trans-identifying men without being explicit about doing so, this creates risk at an organisational level. Policies will inevitably be difficult or impossible to write down or, if necessary, to defend. It will likewise be difficult or impossible to train staff to follow policies that are, by design, vague and unclear.

As the Heal survivors' group notes:

"We are now in a position where local centres may indeed provide survivors who need this a female-only therapeutic environment when they come to ask for help, but, because those centres fear reprisals from trans rights activists who oppose the right of survivors to a female-only service, they will not say so publicly, including when approached for the first time by women seeking reassurances

before taking the contact further. What this means in practice is that a vulnerable survivor who cannot recover in a mixed-sex environment has to overcome an additional barrier to access – her fear that she will be judged prejudiced, bigoted or transphobic or that she will be denied help if her local centre will not offer what she needs at the point of service delivery. The fears of survivors are one of the known barriers to access, and should therefore never just be dismissed as unfounded or about a merely theoretical risk. ²⁷

Conclusion

The UK government says that violence against women and girls has been ignored for too long across the UK. It has set itself a target to halve violence against women and girls over the coming decade through a coordinated national effort. Coordinated efforts require standards.

Our analysis suggests that the failures at ERCC reflect common practices across the sector that are supported by the umbrella body and embedded in its approach to the National Standards. The England and Wales umbrella body takes a less extreme approach than the Scottish body, saying that centres may choose to define women-only services as single-gender or single-sex services. It says that the National Service Standards requirements can be met on the basis of either biological sex or gender identity. But this pragmatically vague approach nonetheless creates significant risk for member organisations.

Standards exist so that organisations can work together in developing staff; attracting funding; communicating with each other and with users; making referrals; and collecting data to understand and make the case for what they are doing.

According to LGBT Youth Scotland, ERCC was operating to the “gold standard” of trans inclusion. RCS saw no conflict between this supposed gold standard and the national standards. Yet the independent review found failures of governance and performance at ERCC. ERCC has now said that it “reinstated and clarified our women only spaces in February 2024”. But these “women-only” spaces remain mixed-sex.

RCS’s CEO, Sandy Brindley, has said that the sector needs “a much more robust framework in place for assessing the national service standards”. She says that ERCC had been failing to

²⁷ Heal survivors’ group (2022). [Letter in response to the Stage 1 report on the Gender Recognition Reform \(Scotland\) Bill](#).

follow the standards, and that RCS was not aware of this. She saw nothing wrong with employing a trans-identifying man to a “female-only” role as CEO of a rape-crisis centre.²⁸

Rape Crisis England and Wales also says that it is considering the findings and recommendations of the independent review of ERCC, and is working to “put in place approaches and guidance to help them continue to deliver specialist, high quality Rape Crisis services to every woman or girl who needs their help”.

The fallout from the Adams case, and the planned review and refresh of the Rape Crisis National Standards, offer an opportunity to ask whether women-led, women-only services are adequately protected by a standard that does not define women, explicitly and clearly, as a sex-based category.

²⁸ BBC Radio Scotland, [Sandy Brindley of Rape Crisis Scotland interviewed, 19th September 2024](#).

Annex 1: Assessing the three models against the RCNSS

	Indicator	Model 1: Ideological	Model 2: Vague	Model 3: Clear
Standard 0: Specialist Service Provision				
	0a) Registered charity or not for profit, complies with charity regulation	A charity set up for women that does not remain centred on women is not sticking to its objects.	A charity set up for women that is not clear in its policies is at risk of diverting from its objects.	The charity is sticking to its objects.
	0b) Primary or major purpose to deliver services to women and girls	The charity has redefined “women” to a mixed sex group.	The charity is risking being diverted from its primary purpose by lack of clarity about “women”	The charity is clear that its primary purpose is focused on women and girls.
	0c) Women led and committed to remaining women led	The charity has/ or is willing to appoint men who identify as women as board members or leaders.	The charity remains women led, but because it is not clear about the meaning of women it is at risk of conflict, challenge and confusion.	The charity has a clear commitment to remain women led.
	0d) Strives to maintain and develop services that meet the needs of survivors	The organisation does not recognise the needs of survivors who want a female-only service (it calls them “transphobes”)	The organisation does recognise the needs of survivors who want a female-only service and strives to meet them.	The organisation recognises and champions the needs of survivors who want a female-only service.
	0e) Feminist perspective	The charity does not recognise that men forcing or coercing their way into women’s spaces or ignoring consent is abuse.	Key leaders recognise that men forcing or coercing their way into women’s spaces or ignoring consent is abuse.	The charity recognises that men forcing or coercing their way into women’s spaces or ignoring consent is abuse.
	0f) Provides and protects dedicated spaces and times for women and girls to access services	No. If the organisation provides “women-only” services it is explicit that these can include trans-identifying men.	The organisation tries to provide “women-only” services, but it is not explicit. Some service users may feel afraid or confused.	Yes the organisation provides clear “women-only” services.
	0g) Anti-racist			

Standard 1: Strong Leadership				
Strategic plan, values and professional frameworks	1.1 a) Clear and transparent aims and objectives	The aims and objectives that are communicated conflict with the charity's objects.	The aims and objectives are unclear.	The aims and objectives are clear and communicated to all and are aligned with the charity's objects.
	1.1 b) Survivor centred, trauma-informed, gender-informed, empowerment orientated, culture of belief, actively anti-racist, and intersectional feminist	Replacing sex with gender identity means the organisation cannot see a category of abuse by men towards women. It has become an institution that abuses those it was set up to protect	The organisation continues to focus on the needs of female survivors.	Being clear about sex allows the organisation to centre on the needs of female survivors of sexual violence.
	1.1.c) Written strategic plan that supports the long term sustainability of high-quality service provision	The organisation's strategic plan is not aligned to supporting services that centre women.	The organisation is at risk of being diverted from supporting services that centre women.	The organisation's strategic plan is aligned to its objects.
	1.1.d) In line with relevant professional ethical frameworks, legislation and evidence-based good practice guidance	The organisation has misinterpreted the law and is likely to be breaching professional ethical frameworks, the Equality Act and health and safety standards by ignoring the protected characteristic of sex in favour of gender identity.	The organisation is at risk of breaching professional ethical frameworks, the Equality Act and health and safety standards by not being clear about sex and gender identity.	The organisation recognises that it needs to be clear about sex in its policies. It understands the single-sex exceptions in the Equality Act and is about to justify its approach.
	1.2 a) Trustees are provided with sufficient information and training about their legal duties, responsibilities and liabilities	Trustees do not understand their responsibilities in governing a charity for women.	Trustees understand their responsibilities in governing a charity for women. Fear of breaching confusing law is undermining their record keeping and controls.	Trustees understand their responsibilities in governing a charity for women.
Good governance	1.2 b) Trustees regularly review and respond to	Trustees are unable to review internal and external developments related to sex and	Trustees try to stay on top of internal and external developments related	Trustees are able to understand their organisation and VAWG.

	risks	gender.	to sex and gender.	
	1.2 c) Transparent policies and procedures to support effective governance, including control of funds			
	1.2 d) Trustees periodically review their efficiency and effectiveness			
Survivors lead	1.3 a) Addressing barriers to feedback and involvement	Women who seek a female only service are denigrated as bigots.	Women who fear that services are not single-sex many self-exclude without feedback.	
	1.3 b) Service users are informed of range of opportunities to feedback	Women who seek a female only service are denigrated as bigots.		
	1.3.c) Policy for actively involving service users and survivors in strategic planning	Women who seek a female only service are denigrated as bigots.		
	1.3 d) Clear opportunities for service users to influence decisions	Women who seek a female only service are denigrated as bigots. Men who identify as women may be seen as most diverse women	If the organisation is not clear that men who identify as women are not women it may include them inappropriately	
	1.3 e) Recognises that service users may wish to become trustees, staff or volunteers	Men who identify as women may be adopted into trustees, staff or volunteers as women.	If the organisation is not clear that men who identify as women are not women it may include them inappropriately	
Healthy work environment	1.4 a) Work environments embrace feminist leadership, power	Trans-identifying men seen as the most disadvantaged women.		

	dynamics are reflected on			
	1.4 b) Values and celebrates staff and volunteers, nurturing their growth and their personal and professional development	Those who do not support gender ideology face discrimination		
	1.4 c) Organisations cultivate open communication, fairness and respect	Those who do not support gender ideology face discrimination	Open communication is undermined by fear about the underlying tensions concerning sex and gender.	
	1.4 d) Recruitment promotes equality, diversity and inclusion	Those who do not support gender ideology face discrimination		
Standard 2: Responsive to Survivors				
Designing services for survivors	2.1 a) Understands the complexity of sexual violence, and its impact on marginalised groups	It is impossible to understand sexual violence without acknowledging sex. Women's services do not have expertise on the needs of trans-identifying men		
	2.1 b) Conducts equalities monitoring	The organisation does not consider the needs of women as a sex		
	2.1 c) Responds to changing needs and demand regarding demographic changes, using robust data	Lack of robust data on sex "LGBTQIA" collapses different categories.		
	2.1 d) Robust referral pathways, effective signposting	ERCC refused to refer to Beira's place. May refer a male user	Organisations unable to clearly refer to other organisations since none are clear	Other rape crisis centres are not clear about women only services .

		to a female only service.	what “women only” mean	
Service users well informed	2.2. a) Service users are informed about the scope, independence and provision of services available to them and systems are in place to enable appropriate access	Services may be unclear that they do not provide a single-sex service. Many service users may not understand what is meant by “trans women”.	Services may be unclear that they do provide a single- sex service. Service users may self-exclude out of fear	Organisation is clear about which services are single sex and which are mixed sex
	2.2 b) b) The organisation supports children and young people in accessing the service, in their own right, in a way that is accessible, empowering and appropriate to them	Services encourage children to be unclear about sex and pressure them to accept “trans women are women”, undermining boundaries.	Children may be put in a situation where boundaries and language are ambiguous, undermining boundaries.	Organisations use clear language and categories to maintain boundaries and consent.
	2.2. c) The organisation follows an ‘empowerment model’ – working alongside all service users in an holistic, flexible and person-centred way to enable them to re-establish control and direction in their own lives	The ordinary view that men are male and women are female is demonised as “transphobic” and “bigoted”. Users are gaslighted to ignore their own perceptions and fears.	The ordinary view that men are male and women are female is viewed as controversial and difficult.	Organisations use clear language and categories to maintain boundaries and consent.
	2.2. d) Signposting to ‘by and for’ groups outside of the Rape Crisis centre			
Service users shape the individual services they	2.3 a) Informed consent	The organisation presents male staff and users as “female”, and treats their sex as	Confusion and ambiguity about sex and gender may make it difficult to obtain	The organisation records sex clearly and is clear when it is offering a

receive		confidential. It is not able to obtain informed consent from others.	and record informed consent decisions.	single-sex or mixed sex environment.
	2.3 b) Service users are enabled to make their own choices about the support and interventions they receive and who provides them	The organisation presents male staff and users as “female”, and treats their sex as confidential. It does not enable users to chose	The organisation offers a choice where between “trans inclusive” (mixed sex) and single sex provision. However this may be confused	The organisation records sex clearly and is clear when it is offering a single-sex or mixed sex environment.
	2.3 c) The organisation ensures that children and young people are enabled to be active partners in the support they receive and are empowered to make their own decisions in line with their age and development stage	The organisation presents male staff and users as “female”, and treats their sex as confidential. This is a breach of its duties to safeguard children.	The organisation offers a choice where between “trans inclusive” (mixed sex) and single sex provision. These are not concepts and risks that children can understand.	The organisation records sex clearly and is clear when it is offering a single-sex or mixed sex environment and does not confuse children about this.
	2.3 d) Individual support needs are understood, and plans are in place that are tailored to meet service users’ specific needs	The individual support needs of women who seek women only services are ignored. Treating men with a transgender identity as if they are women is not recognising their needs.	Individual needs are understood based on recognition of a person’s sex, and other issues they have.	Individual needs are understood based on recognition of a person’s sex, and other issues they have.
Standard 3: Safe Practice				
Safety for service users	3.1 a) Safeguarding policies	It is not possible to safeguard adults and children robustly while ignoring and misrecording sex.	Safeguarding systems may be undermined by inadequate recording and information sharing.	Safeguarding policies recognise sex
	3.1 b) Risk assessment	It is not possible to assess risks robustly while ignoring and misrecording sex.	Risk assessment systems may be undermined by ambiguous language and categories. Recognising sexual motivation	Risk assessment systems include clear recognition of sex, and of the potential sexual motivation (paraphilia) associated with

			(paraphilia) associated with male cross-dressing and cross sex identification is discouraged.	male cross-dressing and cross sex identification.
	3.1 c) Training for risk assessment	Gender identity based language and categories, and the view of disagreement with these as "hostility" mean that staff cannot be effectively trained.	Confusion, controversy and tensions about language and categories, mean that staff may not be effectively trained, and may be afraid to identify risks.	Staff are trained to recognised risks based on clear recognition of individual's sex, and boundary pushing behaviour.
	3.1 d) Up to date knowledge in relation to changing legislation, forms that abuse may take, and potential risks	<p>Organisation only seeks guidance from organisations that are ideologically aligned to gender identity.</p> <p>Risks and issues raised by others are dismissed as transphobia.</p>	Confusion, controversy and tensions about sex and gender may mean that risks and issues are ignored.	
Safety for staff	3.2 a) Robust policies and procedures are in place to assess and manage the physical safety and emotional wellbeing of staff, volunteers and service users	<p>It is not possible to have robust policies to protect staff while ignoring their sex in a situation where sex matters.</p> <p>This can result in harassment of transgender staff as well as gender critical staff.</p>		
	3.2 b) Robust recruitment practices, and training, support and supervision to ensure a culture of safe and reflective practice	It is not possible to have a culture of safe and reflective practice while ignoring and misrepresenting sex.	Culture of safe and reflective practice may be undermined by people feeling unsure whether and how they can reference a person's sex.	The organisation recognises that honesty about individual's sex is necessary for its culture of safe and reflective practice.
	3.2. c) Professional boundaries and appropriate relationships	Professional boundaries are undermined by open secrets, misrepresentation and coercion.	Professional boundaries and appropriate relationships may be undermined by ambiguous language, no-go areas and.	The organisation recognises that honesty about individual's sex is necessary for maintaining professional boundaries and

				appropriate relationships in rape crisis. .
Data security	3.3 a) Confidentiality policies	Organisation has inappropriate and unworkable policies over confidentiality of information on a person's sex.	Organisation may not have clear policies over confidentiality of information on a person's sex. This creates risk for the organisation.	Organisation is clear that a person accessing the service (other situations such as anonymous enquiries) must disclose their sex and that this information is needed operationally.
	3.3. b) Data protection	Organisation records "gender identity" in the field for sex / does not record sex. Data is inaccurate.	Organisation may not have clearly articulated policies for why it needs to record and use information on sex. This creates risk for the organisation	Organisation records sex clearly, and is clear why the information is needed.
	3.3. c) User control of data			
	3.3. d) Controls over sharing with third parties			
Implementing learning.	3.3 a) Recording and review of incidents	Organisation does not accurately record sex, and is not able to review incidents where gender identity ideology is in conflict with users 'needs.	Board may feel constrained in reviewing incidents where gender identity ideology is in conflict with users needs as this is seen as too controversial to record.	
	3.3 b) The organisation has an open, transparent and blame-free culture that encourages reporting, learning and continuous improvement	Gender identity ideology must be protected from outside criticism which is viewed as transphobia and hostility.	The staff and board may be split on the issue of sex and gender, discouraging transparent discussion and learning.	

Standard 4: Lasting Impact				
Setting outcomes	4.1 a) Outcomes framework			
	4.1 b) Monitors progress towards service user outcomes			
	4.1 c) Recognised minoritised survivors barriers	Subgroups of minoritised female survivors such as religious women, women with learning difficulties and disabled women are overlooked in favour of men who identify as women.		
Gathering data and feedback	4.2 a) Use of user feedback	Users are unable to feedback clearly. Disagreement with gender ideology is counted as "hostility" or hate.		
	4.2 b) Continuous improvement			
	4.2 c) Complaints mechanisms	Users are unable to complain clearly. Disagreement with gender ideology is counted as "hostility" or hate.		
	4.2 a) Staff are trained and skilled	Staff are only drawn from those who follow gender identity ideology or are willing not to challenge it.	Staff may become burnt out and disillusioned by tensions over delivery of service.	Difficulty to recruit staff where the sector does not support this approach.
	4.2 b) Trustees are trained and skilled	Trustees are only drawn from those who follow gender identity ideology or are willing not to challenge it.	Board may become split by tensions over delivery of service	Difficulty to recruit trustees where the sector does not support this approach
	4.2 c) Staff development objectives			

	4.2 d) Up to date knowledge	<p>Organisation only gets knowledge from ideologically aligned sources.</p> <p>Disagreement with gender ideology is counted as “hostility” or hate.</p>		
	4.2 a) The organisation provides anonymous data to their national Rape Crisis membership body	<p>Organisation is reporting gender identity data instead of sex based data.</p> <p>The availability of female only services cannot be demonstrated.</p>	<p>It may not be clear if the organisation is reporting gender identity data or of sex based data.</p> <p>The availability of female only services cannot be</p>	<p>Organisation is reporting clear sex based data but it is being mixed with gender identity data at the national level.</p>
	4.2 b) The organisation actively contributes to ending sexual violence – through engaging in public awareness activity across wider communities	<p>The organisation is actively contributing to creating a hostile environment for women seeking to provide services that support female victims of male violence.</p>	<p>The organisation is a making it harder for other organisations that stand up for their principles.</p>	<p>The organisation is standing up for the need for by-women-for-women services and for a clear sex based analysis of male violence against women, and trauma informed care.</p>

Annex 2: Detailed service standards

[Indicators where sex matters in yellow]

Standard 0: Specialist Service Provision Rape Crisis specialist services are independent, community-based services, which work from a trauma-informed, gendered analysis and empowerment perspective to provide confidential specialist services to survivors of sexual violence.	
Core Standard	Core Indicator
The organisation meets and adheres to Rape Crisis England & Wales or Rape Crisis Scotland membership criteria and is defined as a specialist Rape Crisis service.	The organisation is a Registered Charity, Company Limited by Guarantee (not for profit), Community Interest Company, Charitable Incorporated Organisation or Industrial and Provident Society – Community Benefit Society and so adheres to the principles and expectations of The Charity Commission (England & Wales) or The Office of the Scottish Charity Regulator (Scotland).
	The organisation has as its primary or major purpose to deliver services to women and girls who have experienced any form of sexual violence at any time in their lives.
	The organisation is women led and is committed to remaining women led.
	The organisation strives to maintain and develop services that meet the needs of survivors in their area who have experienced any form of sexual violence at any time in their lives.
	The organisation works from a feminist perspective that recognises sexual violence as a crime of violence, an abuse of power, and as a cause and consequence of gender inequality.
	The organisation provides and protects dedicated spaces and times for women and girls to access services.
	The organisation has a clear commitment to anti-racism and is working towards or already takes an actively anti-racist approach to working with survivors, staff and volunteers.

Standard 1: Strong Leadership	
<p>Rape Crisis specialist services have strong leadership and governance that ensures services are survivor-centred and delivered to the highest quality. There are robust strategic plans and frameworks in place to ensure that organisations are safe, sustainable and values driven. Strong leadership should also be evident in the way that intersectional feminist values operate in centres, driving anti oppressive practices, to the benefit of survivors, staff and volunteers.</p>	
Core Standard	Core Indicator
<p>1.1 Strategic plan, values and professional frameworks</p> <p>The organisation has a clear strategic plan that outlines the aims and objectives of the organisation and promotes values supporting empowerment, dignity and respect.</p>	a) The organisation has clear and transparent aims and objectives that are clearly communicated to trustees, staff and volunteers. All trustees, staff and volunteers are aware of their part in achieving these aims and objectives.
	b) The organisation has clear values, which are defined by being survivor centred, trauma-informed, gender-informed, empowerment orientated, embodying a culture of belief, actively anti-racist, and employing an intersectional feminist approach.
	c) The organisation has a written strategic plan that supports the long term sustainability of high-quality service provision. The strategic plan is reviewed regularly and updated in line with changing circumstances.
	d) The organisation’s approach and delivery are in line with relevant professional ethical frameworks, legislation and evidence-based good practice guidance appropriate to specialist service provision

Core Standard	Core Indicator
<p>1.2 Good governance</p> <p>The members of the governing body are aware of their legal duties and responsibilities; quality, performance and risks are understood and managed.</p>	a) Trustees are provided with sufficient information and training about their legal duties, responsibilities and liabilities to enable them to govern effectively, fostering a culture of accountability.
	b) Trustees regularly review and respond to relevant internal and external developments, identifying, assessing and taking steps to mitigate organisational risks, including those that might impact the wider movement.

	c) The organisation has transparent policies and procedures to support effective governance, including the lawful and relevant use and control of its funds. Governance policies and procedures are reviewed regularly.
	d) Trustees periodically review their efficiency and effectiveness and take steps to develop, adapt and improve where gaps are identified.

Core Standard	Core Indicator
1.3 Survivors as organisational leaders The organisation works in a way that centres survivor voice and recognises the value of lived experience. Survivors of sexual violence and service users have opportunities to be involved at all levels of the organisation, from evaluation of services to strategic developments.	a) The organisation ensures it is addressing barriers faced by service users to enable them full access to participate in feedback and involvement opportunities in a way that is appropriate and relevant to their needs.
	b) Service users are informed about a range of opportunities to give feedback on all aspects of the service they receive. There are opportunities to respond to relevant external consultations and campaigns in relation to wider social issues affecting their lives.
	c) The organisation has a policy for actively involving service users and survivors in strategic planning, and in the planning of specific services.
	d) There are clear opportunities for service users and survivors to influence decisions within the organisation (for example, survivor reference groups feeding into strategic decision making).
	e) The organisation recognises that service users may wish to become trustees, staff or volunteers, and that trustees, staff and volunteers may themselves need access to specialist sexual violence support – and has an agreed approach to this.

Core Standard	Core Indicator
1.4 Leading healthy work environments Trustees and the senior leadership team in the organisation	a) Organisations foster empowering work environments that embrace feminist leadership, anti-oppressive and anti-racist practices. Power dynamics are reflected on, with active efforts to dismantle bias, discrimination, and privilege within the organisation taking place.

<p>create a healthy work environment where feminist leadership and anti-oppressive principles are put into practice.</p>	<p>b) Organisations embrace a mindset that values and celebrates staff and volunteers, nurturing their growth and their personal and professional development.</p>
	<p>c) Organisations cultivate open communication, fairness and respect. There are comprehensive support systems that empower staff and volunteers to consider their wellbeing as well as self and collective care.</p>
	<p>d) Organisations implement recruitment practices that actively dismantle biases, creating opportunities for marginalised groups and fostering genuine inclusion, fairness, and a sense of belonging.</p>

<p>Standard 2: Responsive to Survivors</p> <p>Rape Crisis specialist services are responsive to the diverse needs of survivors and actively working towards ensuring that services are relevant, accessible and survivor led.</p>	
<p>Core Standard</p>	<p>Core Indicator</p>
<p>2.1 Designing services for survivors</p> <p>The organisation understands and responds to diversity of need within the population it serves, and uses this knowledge to inform service planning, delivery and partnerships.</p>	<p>a) The organisation understands the complexity of sexual violence, and its impact on marginalised groups. Staff and volunteers respond to the specific and diverse needs of service users through planning and delivery of services.</p>
	<p>b) The organisation conducts equalities monitoring of its service users and takes positive steps to listen and respond to needs identified by lesser heard or underrepresented voices in the service.</p>
	<p>c) The organisation has processes in place to ensure that its services recognise and respond to changing needs and demand regarding demographic changes, using robust data.</p>
	<p>d) The organisation seeks to work in partnership to meet survivor need and to develop robust referral pathways, where available and appropriate. Staff and volunteers have reliable and up-to-date information and are enabled to effectively signpost or refer service users to relevant organisations.</p>

Core Standard	Core Indicator
<p>2.2 Service users are well informed</p> <p>Service users are informed about the scope, independence and any limitations of the services being provided.</p>	a) Service users are informed about the scope, independence and provision of services available to them and systems are in place to enable appropriate access.
	b) The organisation supports children and young people in accessing the service, in their own right, in a way that is accessible, empowering and appropriate to them.
	c) The organisation follows an ‘empowerment model’ – working alongside all service users in an holistic, flexible and person-centred way to enable them to re-establish control and direction in their own lives.
	d) The organisation recognises that some survivors may be best served or may prefer to use specialist services run ‘by and for’ marginalised groups outside of the Rape Crisis centre, and actively signposts where asked.

Core Standard	Core Indicator
<p>2.3 Service users shape the individual services they receive</p> <p>Services are informed by the needs of service users and each service user is an active partner in the service they receive.</p>	a) The organisation seeks explicit and informed consent from service users, in line with relevant consent and decision-making guidance and legislation, to enable service users to engage meaningfully with services provided.
	b) Service users are enabled to make their own choices about the support and interventions they receive and who provides them.
	c) The organisation ensures that children and young people are enabled to be active partners in the support they receive and are empowered to make their own decisions in line with their age and development stage.
	d) Individual support needs are understood, and plans are in place that are tailored to meet service users’ specific needs – and are flexible to meet these needs. Service users are active partners in their development and review.

Standard 3: Safe Practice	
Rape Crisis specialist services seek to expand the safety and wellbeing of all survivors (as well as staff and volunteers) and work within safe, trauma-informed models of practice that facilitate this.	
Core Standard	Core Indicator
3.1 Safety for service users The organisation has robust and reliable systems and practices in place to keep people safe and safeguarded from harm.	a) The organisation has in place robust policies, procedures and practices that reflect good practice guidance for safeguarding children and adults, which adhere to legislation and local statutory frameworks.
	b) The organisation has robust risk assessments in place that reflect and respond to specific risks to service users and client-facing staff, and these are reviewed and updated at regular intervals.
	c) Staff, volunteers (and where relevant, trustees) are supported to carry out needs and risk assessments and receive sufficient training and information to do so safely within the remit of the service.
	d) The organisation keeps up to date with knowledge and good practice in relation to changing legislation, forms that abuse may take, and potential risks related to service users and this learning is incorporated into the service's policies, training and response to safeguarding issues.

Core Standard	Core Indicator
3.2 Safety for staff The organisation ensures a safe working environment for staff, volunteers, trustees and service users.	a) Robust policies and procedures are in place to assess and manage the physical safety and emotional wellbeing of staff, volunteers and service users, both within the centre and when working off site, and action is taken to provide and maintain a safe place of work.
	b) The organisation prioritises robust recruitment practices, and implements comprehensive systems of training, support and supervision to ensure a culture of safe and reflective practice.
	c) The organisation sets out and observes clear professional boundaries to guide appropriate relationships between service users and staff/volunteers.

Core Standard	Core Indicator
3.3 Secure data The organisation operates policy and guidance on confidentiality and data protection that is compliant with current legislation and good practice.	a) The organisation has clear policy and procedures in place that protect service user confidentiality. Limitations to confidentiality are clearly communicated.
	b) The organisation has transparent policy and procedures in place that relate to the lawful collection, handling, processing, movement and disposal of data and all trustees, staff and volunteers are aware of their rights and responsibilities in line with current data protection legislation.
	c) Service users are active partners in the collection and control of their personal information and are made aware of their rights to access, amend or delete data in line with data protection legislation.
	d) Where information is shared with a third party, it is relevant and proportionate, and governed by robust protocols that protect the interests and privacy rights of service users.

Core Standard	Core Indicator
3.4 Implementing learning The organisation has processes in place to support the continuous improvement of safety and protection across the service.	a) The organisation has a process in place to enable the recording, review and learning from safety incidents and relevant staff, volunteers and trustees are involved in this process.
	b) The organisation has an open, transparent and blame-free culture that encourages reporting, learning and continuous improvement.

Standard 4: Lasting Impact	
Rape Crisis specialist services are dedicated to ending sexual violence and abuse, driving the impact and effectiveness of services, and fostering lasting change.	
Core Standard	Core Indicator
4.1 Setting outcomes The organisation identifies outcomes for its service users that are meaningful	a) The organisation has an outcomes framework in place that is meaningful and relevant to all of its service users.
	b) The organisation monitors progress towards service user outcomes and uses monitoring methods that give opportunities for all service users to express themselves in

<p>to those users and to funders and commissioners.</p>	<p>their own words.</p>
<p>4.2 Gathering data and feedback</p> <p>The organisation has a structure in place for collating and analysing service user feedback and using it to inform service provision, quality and improvement.</p>	<p>c) The organisation recognises that minoritised survivors may face additional barriers due to oppressive and inaccessible systems that affect their ability to contribute feedback, and puts measures in place to overcome these barriers.</p> <p>a) The organisation demonstrates that service user feedback is used to inform and improve service planning, development and campaigning priorities (where relevant).</p> <p>b) The organisation has processes in place to ensure need and demand are identified and responded to and there are clear service performance measures that support continuous quality and improvement.</p> <p>c) Service users are informed how and to whom they can complain if not satisfied with any aspect of the service or response they receive.</p>

Core Standard	Core Indicator
<p>4.3 Effective staff</p> <p>The organisation ensures that staff and volunteers have the relevant skills, knowledge and experience to deliver effective and high-quality service provision.</p>	<p>a) The organisation ensures that all staff and volunteers are sufficiently skilled, trained and experienced to work effectively within their role and the aims and objectives of the service.</p> <p>b) The organisation has effective policies and procedures in place to support the on-going training, learning and development of staff, volunteers and trustees to ensure they are sufficiently trained for their specific role and client group.</p> <p>c) The organisation sets clear development objectives for all staff, reviews progress against these regularly and takes effective steps to improve performance.</p> <p>d) Staff and volunteers are equipped with up-to-date information and knowledge, empowering them to deliver specialist support services effectively.</p>

Core Standard	Core Indicator
<p>4.4 Impact on wider society</p> <p>The organisation recognises violence against women and girls as a human rights violation, raising awareness of the impact of sexual violence including challenging misperceptions and social tolerance.</p>	<p>a) The organisation provides anonymous data to their national Rape Crisis membership body on service delivery outputs and outcomes, to enable national pictures around prevalence and demand to be formulated and used in all its work.</p>
	<p>b) The organisation actively contributes to ending sexual violence – through engaging in public awareness activity across wider communities regarding the impacts of sexual violence, challenging rape myths and rape culture, and empowering survivors to be involved in this work.</p>

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