

Complaint 1: Girlguiding and the Language of “Biological Boys”

Complaint 1, 1st level

Inaccurate & Harmful Language about Trans people

Dear BBC Complaints Team,

I am writing to complain about the language used in recent BBC reports about transgender people. Your coverage has described transgender women as “biological men who identify as women” and transgender girls as “biological boys who identify as girls,” including in recent reporting about the Girl Guides.

This language is inaccurate, demeaning and misleading. It reduces transgender people to their assigned sex at birth and implies they are merely choosing an identity, rather than reflecting who they are.

- Biological sex is multi-factorial (chromosomes, hormones, secondary sex characteristics, endocrine system, etc.).
- Gender identity is recognised medically and legally; many trans people also undergo medical transition, making your descriptions factually incorrect as well as insensitive.

The BBC’s Editorial Guidelines require accuracy, fairness, and care to avoid unjustified offence. The wording currently used fails to meet those standards. It reinforces harmful narratives used by groups seeking to delegitimise trans people, and contributes to misunderstanding and stigma at a time when hostility and hate crimes against trans individuals are rising. The BBC’s language choices not only communicate stories, they also shape public perception.

There are accurate, respectful alternatives already widely used by reputable media outlets: simply refer to people as trans women, trans men or non-binary people where relevant. These terms are clear, factual and avoid misrepresentation.

I request that the BBC:

- Reviews its editorial language relating to trans people;
- Adopts terminology that reflects medical, legal and social reality;
- Issues corrections or clarifications where inaccurate phrasing has been used.

As a public service broadcaster, the BBC has a responsibility not to fuel prejudice or

misinformation. I look forward to your response and to seeing improvements in future reporting.

BBC Response, Complaint 1, 1st level
CAS-8262597-X6T1S2

Dear Ms S*****

Thank you for getting in touch with us about the BBC News article: “Trans girls can no longer join Girlguiding, organisation says”.

We always strive to report clearly and accurately and it’s never our intention to offend or use language which some would find derogatory.

While we understand that some audience members object to the reference to “biological boys who identify as girls”, we believe that this wording provides clarity to those who find the issue confusing. However, we do note your points and are sorry if you found the description to be inappropriate.

We recognise that there is controversy over the distinction between sex and gender, but don’t feel that the language used in this report amounts to taking sides.

We understand you may continue to disagree with our editorial choices here and value knowing when audience members have been disappointed with any aspect of our coverage. Your feedback has been recorded on our overnight reports and circulated widely.

If you’d like to understand how your complaint is handled at the BBC, you might find it helpful to watch [the short film on the BBC Complaints website about how the BBC responds to your feedback](#). It explains the BBC’s process for responding to complaints, what to do if you aren’t happy with your response and how we share the feedback we receive.

Thank you again for taking the time to get in touch.

Kind regards,

BBC Complaints Team

Complaint 1, 2nd level

I would like to escalate my complaint regarding the BBC’s use of phrases such as “biological boys who identify as girls” in its reporting on transgender people. The re-

sponse I received did not address the substantive issues I raised and is inadequate under the BBC's own Editorial Guidelines.

Your reply stated that this language "provides clarity," but it is not accurate. Guideline 3.1 (Accuracy) requires the BBC to reflect current evidence. Biological sex is multifactorial, and major medical bodies (including the Endocrine Society, WPATH, APA and BMA) recognise gender identity and, where relevant, medical transition as part of sex. Reducing trans girls to "biological boys" is medically misleading and reinforces public misunderstanding.

The wording also risks harm, in breach of Guideline 4.1 (Harm and Offence). This phrasing is closely associated with campaign groups seeking to delegitimise trans people. Whether or not the BBC "intends" offence does not remove the real-world impact on a marginalised group.

Guideline 4.3 (Sensitive Reporting) requires care in coverage relating to minority communities. Your response did not engage with this at all, and the framing used contributes to stigma.

Your reply also stated the BBC is "not taking sides," but this contradicts Guideline 4.4.2, which states that due impartiality does not mean presenting harmful or unscientific positions as neutral fact. Adopting terminology used by anti-trans groups is not impartiality.

Finally, my original complaint included clear requests for review and correction. None of these were addressed. Simply restating the justification for the wording does not meet the standard of an adequate response under the BBC complaints process.

I am therefore requesting that my complaint is formally escalated to the next stage, with specific consideration of whether the reporting breached Guidelines 3.1, 4.1, 4.3 and 4.4.2.

BBC Response - Complaint 1, 2nd level

Dear Ms S*****

Thank you very much for your further comments about the report "Trans girls can no longer join Girlguiding, organisation says". I was sorry to read of your ongoing concerns and that you were dissatisfied with our earlier response.

I should explain that we are obliged to consider proportionate use of the license fee in complaints handling. This means that we may send a detailed consolidated response if we get several complaints about the same article. We do read all com-

plaints and are sorry if you felt some of the previous reply was not relevant to the points you raised.

We do understand that there is not universal consensus over what defines a biological man / woman and note your points. Our coverage of issues concerning trans people evokes strongly held and sometimes incompatible views, as we can tell from the volume of feedback we get, expressing opposite points of view. We understand that levels of understanding about issues concerning trans people differ widely, as do opinions on what constitutes appropriate terminology. We therefore always aim to provide as much clarity as possible, whilst adhering to our published editorial guidelines.

While the language used is intended to be simple and explanatory, easily understood by a wide audience, I acknowledge some people find it crude and may be offended/upset by it. Clearly that is not the intention and I'm sorry for any offence caused to you.

Senior editors in the newsroom are aware of the full spectrum of feedback we get. While overall we believe that the piece adheres to our editorial guidelines, we would like to assure you that we take on board your concerns and acknowledge the importance of reporting clearly, accurately and respectfully.

Should you remain dissatisfied, you can find further information about escalation of complaints, below. Thank you again for taking the time to provide your comments.

Yours sincerely

Complaint 1 – ECU Level

I am submitting this complaint to the Executive Complaints Unit following the BBC's conclusion of Stage 1 in relation to the article "Trans girls can no longer join Girlguiding, organisation says" (Ref 8262597).

I believe there is a potential breach of BBC Editorial Guidelines, and that the issue is significant and merits investigation.

As raised during Stage 1, my concern is not limited to a single article, but relates to the BBC's consistent use of terminology such as "biological boys who identify as girls" and "biological men who identify as women" across BBC News reporting. This indicates a broader editorial approach rather than an isolated wording choice, and was a core part of my original complaint.

Throughout the complaints process, the BBC has acknowledged that this terminology is found by many to be crude, offensive, and upsetting, yet has chosen to continue defending its use on the grounds of “clarity” and lack of consensus. This justification does not withstand scrutiny under the Editorial Guidelines.

Accuracy (Guideline 3.1):

The BBC states there is “not universal consensus” on what defines a biological man or woman. However, this does not justify presenting a reductive and contested framing as factual description. Biological sex is widely understood in medicine to be multifactorial, and major medical bodies recognise gender identity and medical transition as relevant. Describing trans women or girls as “biological men/boys” is therefore misleading and risks materially misleading audiences.

Harm and Offence (Guideline 4.1) and Sensitive Reporting (4.3):

The BBC has acknowledged that the language used causes offence and distress, yet continues to prioritise perceived audience “clarity” over harm mitigation. As raised at Stage 1, this terminology is widely experienced as stigmatising by trans people. The Guidelines require care to avoid unjustified offence, particularly when reporting on marginalised groups.

Due Impartiality (Guideline 4.4):

The BBC maintains that it is not taking sides, yet repeatedly adopts language closely associated with one side of a highly polarised social and political debate. Presenting this framing as neutral explanation risks embedding a particular ideological position as fact.

As noted during Stage 1, this terminology appears repeatedly in BBC News reporting on issues such as women’s sport, single-sex services, and policy debates relating to transgender people. These examples are not raised as separate complaints, but as evidence of the same editorial approach already objected to.

Finally, the handling of my complaint relied heavily on generic explanations about disagreement and proportionality, rather than engaging meaningfully with the substantive concerns raised about accuracy, harm, and compliance with editorial standards.

I am therefore asking the ECU to investigate whether the BBC’s editorial decision-making, including the systemic use of this terminology across BBC News, and its handling of my complaint meet the standards required of a public service broadcaster.

BBC RESPONSE - Complaint 1 – ECU Level

Ref: CAS-8262597

16 January 2026

Dear Ms S*****

Your complaint about BBC News

Thank you for contacting the Executive Complaints Unit and asking it to respond to your concern about the language used by BBC News when it reports on trans issues. You referred specifically to *“the BBC’s consistent use of terminology such as ‘biological boys who identify as girls’ and ‘biological men who identify as women’”*.

In your original complaint you referred to a particular BBC News [article](#) but since you have made it clear you are raising a more general concern about the approach adopted by BBC News, I have considered your complaint under section 3 of the BBC’s [Complaints Framework](#). This explains how the BBC should respond to complaints of a general nature where the complainant is looking for the BBC to change the way it does things rather than raising concerns about a specific item.

I appreciate this is a subject on which you hold strong views and I am sorry you don’t believe the language used by BBC News is appropriate. However, I think it is reasonable to say it is a challenge for a news organisation like the BBC to report impartially and use appropriately clear language which everyone considers acceptable because of the divisive nature of this issue.

The BBC aims to ensure its reporting is understandable and accessible, including for those who may not be familiar with some of the terminology preferred by those more engaged with the issues. In general, this will mean using language and terms which are widely understood, accurate and appropriate to the context. This may sometimes result in using words or descriptions one side or another considers problematic but it should not be taken to imply the BBC is endorsing one perspective.

This is a polarising topic and any choice of words or framing can be perceived as taking a side. Striking a balance between accurately conveying facts and avoiding language which may appear to reinforce one viewpoint over another is particularly difficult given members of the audience may interpret coverage through their own perspective and may expect language which aligns with their own personal views.

It is also the case due impartiality and due accuracy do not rest solely on the language used, but can also be engaged by, for example, the inclusion of views which make clear where the controversy is and the real-world impact of events on those affected.

In the case of the BBC News article about the decision by Girlguiding, for example, a range of relevant views was included. The trans rights organisation TransActual was quoted as stating *“There is no problem being solved here, only harm being done”*. The reference to trans girls as *“biological boys who identify as girls”* was intended to

explain Girlguiding's decision and ensure all readers understood the changes it was making. The wording was not used in a derogatory manner or to undermine the rights of trans people.

I appreciate you may disagree with the approach adopted by BBC News but I hope I have been able to explain why I believe it meets the relevant editorial standards. The majority of BBC content is aimed at a general audience, including those who may not have a clear understanding of the terminology associated with sex and gender identity. I think it is reasonable to assume most readers will understand "*biological sex*" to refer to characteristics, such as chromosomes and anatomy, which are taken into account when a person's sex is recorded at their birth. As noted earlier, the aim is to report in a way which helps the audience to understand the issues, using language which is appropriate to the context.

There is no further right of appeal against this decision within the BBC's complaints process but if you do wish to take the matter further, it is open to you to ask the broadcasting regulator, Ofcom, to consider your complaint. You can find details of how to contact Ofcom and the procedures it will apply at the following website: <https://www.ofcom.org.uk/tv-radio-and-on-demand/how-to-report-a-complaint>. You can also write to Ofcom at Riverside House, 2a Southwark Bridge Road, London SE1 9HA, or telephone either 0300 123 3333 or 020 7981 3040. I should explain, however, Ofcom tends not to consider complaints of a general nature such as this.

Yours sincerely

Colin Tregear

Executive Complaints Unit

OTHER COMPLAINT – NOT FOLLOWED UP

Reference CAS-8269526-N1S0J2

Dear Ms S*****

Thank you for getting in touch about terminology used around transgender people.

We always strive to report clearly and accurately and it's never our intention to offend or use language which some would find derogatory.

While we understand that some audience members object to the phrases like "biological men who identify as woman", we believe that this wording provides clarity to those who find the issue confusing. However, we do note your points and are sorry if you find this language inappropriate.

We recognise that there is controversy over the distinction between sex and gender, but don't feel this the language amounts to taking sides. That said, we're grateful for your feedback and it's really helpful to know how our audience feels about our content.

We understand you may continue to disagree with our editorial choices here. Your feedback has been recorded on our overnight reports and circulated widely.

Kind regards,

BBC Complaints Team

Complaint 1 – OFCOM LEVEL

Please see below a summary of your complaint:

Subject:

I complained that BBC repeatedly uses inaccurate and demeaning terminology about trans women (e.g. "biological men who identify as women"), including in the Girlguiding article, misrepresenting medical reality and breaching standards of accuracy and harm

Description:

I complained about the BBC's repeated use of inaccurate and demeaning terminology when reporting on transgender women, specifically phrases such as "biological men who identify as women" and "biological boys who identify as girls". This language was used in the BBC News article "Trans girls can no longer join Girlguiding, organisation says", and has since appeared consistently across BBC News reporting.

I argued that this framing misrepresents contemporary medical and social understandings of sex and gender, ignores the biological changes associated with medical transition, and reduces trans women to their assigned sex at birth rather than accurately describing them as trans women. I explained that this terminology is widely regarded as stigmatising and is commonly used by groups hostile to trans people, yet is presented by the BBC as neutral or explanatory.

I further raised concern that this wording is not necessary for clarity, as other reputable news organisations report the same stories without resorting to such language, and that its repeated use suggests an editorial pattern rather than an isolated choice. I asked the BBC to reconsider this approach in line with its editorial guidelines on accuracy, harm, and respectful reporting

Reason for dissatisfaction with the outcome of the BBC's final response:

the BBC acknowledged that the terminology used is offensive and upsetting to some audiences, yet still defended its use as providing "clarity", without engaging meaningfully with my concerns about factual inaccuracy, medical reality, or the cumulative harm caused by repeated framing of trans women as "biological men". The response relies on the existence of "controversy" to justify language choices, rather than as-

sessing whether those choices meet the BBC's own standards of accuracy, impartiality, and avoidance of unnecessary harm. It also fails to address the systemic pattern of this terminology across BBC News reporting, treating it as an isolated editorial decision.

BBC Reference Number:

CAS-8262597

Date you submitted your complaint to the BBC:

03/12/2025

Complaint 2: Darlington NHS Tribunal and “Biological Male” Framing

Complaint 2 – 1st Level

Harmful and inaccurately framed language

In the BBC News live coverage of the Darlington NHS nurses employment tribunal the report repeatedly refers to a transgender colleague in terms like “born male but identifies as a woman” or similar constructions.

This continues a pattern of terminology I have previously complained about (see Ref 8262597). It frames trans women primarily by assigned sex at birth rather than accurately describing them as trans women. This phrasing is misleading, contributes to stigma, and fails to reflect medical and social understandings of gender identity or the biological changes of medical transition. Other reputable news organisations covering the same story use different wording or provide clearer context for what it means to be transgender.

Taken together with recent coverage, this repeated terminology gives the clear impression of an editorial framing that aligns with a particular “gender critical” perspective, rather than a neutral or evidence-based approach. Regardless of intent, the effect is to encourage and normalise language commonly used to delegitimise trans people, while presenting it as neutral explanation.

I urge the BBC to reconsider this editorial choice, provide context that reflects the complexity of gender identity, and avoid relying on language that many audiences, including those directly affected, find demeaning and harmful.

BBC Response - Complaint 2 – 1st Level

Dear Ms S*****

Thank you for getting in touch with us about the article: 'Listen to women' nurses say, after tribunal rules sharing changing room with trans woman 'violated dignity': <https://www.bbc.co.uk/news/live/c62nwl7j44gt>

We understand that some readers found the reference to Rose as a 'biological male who identifies as a woman' to be inappropriate. While the language used was intended to explain the issue simply and clearly to our wide range of audience members, any unintentional offence is regrettable.

This is how Rose was described at the tribunal and so the language used reflects the court's proceedings, including the use of Rose's first name.

We believe that this wording provides extra clarity to those members of our audience who we know from feedback can find the issue confusing.

We hope to have explained more behind the editorial choices made. While we always strive to report with maximum clarity and accuracy, it is never our intention to offend or inflame.

We value knowing when audience members have been disappointed with any aspect of our coverage and appreciate your feedback, which has been recorded on our overnight reports and circulated widely.

Thank you for getting in touch with us and we are grateful you took the time to do so.

If you'd like to understand how your complaint is handled at the BBC, you might find it helpful to watch [the short film on the BBC Complaints website about how the BBC responds to your feedback](#). It explains the BBC's process for responding to complaints, what to do if you aren't happy with your response and how we share the feedback we receive.

Kind regards,

BBC Complaints Team

Complaint 2, 2nd level

Your response reinforces my concern. Describing a medically transitioned trans woman as a "biological male who identifies as a woman" is not a neutral clarification but a contested, ideologically loaded framing that is medically incomplete & factually misleading. A trans woman is not simply a "biological male" in any meaningful biological, clinical, or social sense, & presenting her as such under the guise of clarity misinforms audiences rather than educating. This also contradicts the BBC's own Style Guide & Editorial Guidelines, which state that a person who lives as female should be described as a "transgender woman" & referred to by their preferred pronouns. Section 2 further requires the BBC to avoid unjustifiable offence & provide appropriate protection to vulnerable groups. Reverting to reductive, biological-essentialist

language fails to meet these standards. The BBC justifies its terminology by stating it reflects language used in the Tribunal judgment. However, this does not account for the editorial decision to adopt that terminology outside direct quotation, including headlines & lead paragraphs. While legal definitions may need to be referenced, the BBC has historically distinguished between legal language & editorial narration by providing context rather than mirroring potentially harmful terminology wholesale. The recent shift in terminology used represents a significant departure from your own guidance. You acknowledge that many readers find this language inappropriate, yet continue to defend it on the basis that some “find the issue confusing”, - based on unspecified “audience feedback”, yet provides no explanation of how this is evaluated or balanced against accuracy, harm & minority impact. Audience confusion cannot override factual accuracy or justify the harm caused by repeatedly framing trans women in reductive terms. I do not accept that this approach meets the BBC’s obligations on accuracy, impartiality, or avoidance of unnecessary harm.

BBC Reponse – Complaint 2, 2nd level

Thank you for getting in touch about the above article.

We understand that you were not satisfied with our first response. We are sorry that you do not agree with our editorial decisions and we understand that not every one will. And we understand your depth of feeling on this.

We stand by our first response to you as we believe that the use of biological male here is fair and duly accurate as part of the tribunal proceedings.

We are grateful you took the time to contact us about this message and want to let you know that we have heard your feedback and your comments have been circulated widely amongst senior managers which helps to inform our future reporting.

Kind regards,

This concludes Stage 1 of our complaints process. That means we can’t correspond with you further here. If you remain unhappy, you can now contact the BBC’s Executive Complaints Unit (ECU). The ECU is Stage 2 of the BBC’s complaints process. You’ll need to explain why you think there’s a potential breach of standards, or if the issue is significant and should still be investigated. Please do so within 20 working days of this reply.

Full details of how we handle complaints are available at <http://www.bbc.co.uk/complaints/handle-complaint/>.

How to contact the ECU:

We've provided a unique link for you in this email. This will open up further information about how to submit your complaint. You'll be asked for the case reference number we've provided in this reply. Once you've used the link and submitted your complaint, the link will no longer work.

This is your link to contact the ECU if you wish:

[Click Here](#)

Kind regards

BBC Complaints Team

Complaint 2 – ECU Level

I believe there is a potential breach of BBC editorial standards because the BBC's Stage 1 responses defend the repeated use of the term "biological male" as "fair and duly accurate" without properly addressing the substance of my complaint.

The BBC relies primarily on the argument that this terminology reflects language used in Employment Tribunal proceedings. However, this does not explain why the BBC chose to adopt that language outside direct quotation, including in headlines and editorial narration. The BBC routinely paraphrases, contextualises, or explains legal language elsewhere in its reporting. Choosing not to do so in this case is an editorial decision, not a requirement of legal accuracy.

Describing a medically transitioned trans woman as a "biological male" is medically incomplete and misleading. It ignores well-established medical understanding that sex characteristics are not static and that medical transition produces significant biological change. Presenting this framing as neutral clarification misinforms audiences rather than educating them.

This approach also conflicts with the BBC's own Style Guide (under G – Gender <https://www.bbc.co.uk/newsstyleguide/all/#g>) which advises describing individuals by their lived gender identity (e.g. "transgender woman") and avoiding terminology that reduces people to their sex assigned at birth. The BBC has not reconciled its claim that this wording is "duly accurate" with its long-standing editorial guidance on respectful and accurate reporting of transgender people.

In addition, the BBC's responses acknowledge that many readers find this language inappropriate or upsetting, yet continue to justify its use on the basis that some audiences "find the issue confusing". Audience confusion cannot override factual accuracy, nor does it absolve the BBC of its obligations under the Editorial Guidelines on Harm and Offence to avoid unjustifiable harm and provide appropriate protection to

vulnerable groups.

Crucially, the BBC's responses treat this issue as an isolated editorial choice, despite my repeated concern that this terminology now appears consistently across BBC News reporting on transgender-related stories. The failure to engage with this cumulative pattern, and its impact, represents a significant omission in the Stage 1 handling of my complaint.

For these reasons, I do not accept that the BBC has adequately addressed whether its language choices meet its obligations on accuracy, impartiality, and avoidance of unnecessary harm. I therefore believe this complaint warrants investigation by the Executive Complaints Unit.

Complaint 3: Prison Policy Reporting and the Term "Trans Identifying Male"

Complaint 3 – 1st Level

Terms used to refer to trans women - derogatory

I'm writing to complain about the article referenced above, which repeatedly uses the term "trans-identifying male" to refer to transgender women.

This phrasing is not a neutral or necessary, it is a contested, ideologically loaded term that is widely regarded as demeaning & commonly used by groups hostile to trans people to deny trans women's gender.

By repeatedly using "trans-identifying male", the BBC departs from their own Style Guide & adopts language that reframes trans women as men by default, presenting this as neutral explanation.

As with previous complaints I've raised, the BBC appears to justify such terminology on the basis of legal context or clarity for audiences. However, legal argument does not require the BBC to reproduce contested language uncritically. The BBC routinely contextualises & paraphrases legal submissions in other areas of reporting. Choosing not to do so here is an editorial decision.

I note the article has since been amended so the term no longer appears in the opening editorial narration, instead confined to clearly attributed quotations from counsel. This change demonstrates that the original use of the term in the BBC's own voice was not necessary for legal accuracy, but an editorial choice. The distinction between quoted courtroom language & unquoted editorial description is precisely the concern I raised.

The effect of this wording is harmful, contributes to stigma, misrepresents contemporary medical & social understanding of trans people, & undermines the BBC's obligations under its Editorial Guidelines on Accuracy & on Harm & Offence, including

the duty to avoid unjustifiable offence & to provide appropriate protection to vulnerable groups. This article forms part of a wider & ongoing pattern in BBC reporting in which increasingly reductive /hostile terminology is used when referring to trans women. I ask the BBC to reconsider this language choice & to explain how it is compatible with its own published editorial standards.