Best Practices to Improve Police Relations with Transgender Individuals
Jan S. Redfern, PhD

ABSTRACT

Many experts agree that being transgender is a reflection of normal variation of human development and not a mental illness. However, transgender individuals continue to experience a wide range of unique challenges in their everyday lives, in workplaces, healthcare settings, judicial system, housing, and on occasion, in their interactions with law enforcement. Some transgender individuals have a general lack of trust of police, perhaps arising from first-hand experiences or the experiences of friends and community members, or as a result of the media publicizing accounts of harassment and incidents of abuse. Police departments should consider sensitivity training of law enforcement professionals to increase awareness and appreciation of gender diversity, to avoid personal biases and assumptions, and to avoid costly litigation from civil rights violations. Such training would help police officers improve interactions and communications with transgender individuals when officers are assisting these individuals or in cases where an arrest must be made. Transgender individuals should also be aware that they too have responsibilities during interactions with police, and their behavior can positively or negatively impact the outcome of such encounters. To help improve relations and bolster trust between the transgender community and law enforcement, police officers should consider speaking at local or national transgender organizations and conferences.

Keywords: Transgender, harassment, abuse, civil rights violations
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During routine policing in the field, officers are likely to encounter a broad spectrum of gender diversity that is not reflected in traditional male-female stereotypes. Individuals who cross or transcend culturally defined categories of gender are referred to as transgender (see Appendix for definitions). Transgender is a broad term that includes: transsexuals, cross-dressers, drag queens/kings, Native American two-spirit, and gender-queer, among others.

As a group, transgender individuals experience a wide range of unique challenges in their everyday lives—in schools, workplaces, healthcare settings, the judicial system, housing availability, and in interactions with law enforcement (Grant et al., 2010). Nevertheless, transgender individuals have the fundamental right to live with dignity and privacy in their self-proclaimed gender, without worrying about the possibility of harassment, discrimination, or physical harm.

With respect to law enforcement interactions, all people including transgender individuals are entitled to fair and equal treatment with flexible responses to their unique gender needs. All too often, however, transgender people are a misunderstood and maligned group and may not always experience the same respect and courtesy afforded to non-transgendered individuals. As a consequence of adverse interactions between law enforcement and some transgender individuals, there are numerous cases in the media of law enforcement agencies becoming involved in costly and protracted litigation from civil rights attorneys and activist groups.

However, while legislation and implementation of policies and procedures are an excellent first step to improve interactions and relations between law enforcement and members of the transgender community, these alone cannot fundamentally change personal beliefs and attitudes towards transgender individuals. Changing perceptions, behavior, hearts, and minds of some takes cumulative, positive interactions and experiences with these populations, which are often misunderstood. In this respect, education is key to enhancing communication skills, knowledge, awareness, and receptivity to gender fluidity and non-traditional gender presentations within the law enforcement community.

This article was developed as a succinct overview for law enforcement agencies as a starting point to help bridge gaps in understanding regarding important issues faced by transgender individuals in law enforcement settings, while helping improve interaction with transgender individuals. The specific objectives of this article include: 1) Review transgender culture and its diversity; 2) Outline interactions between transgender individuals and law enforcement personnel in field incidents and the areas of particular concern; and 3) Describe practical suggestions and guidelines to improve relations with transgender individuals during interactions or processing with law enforcement personnel. This includes: policies and standards for interacting with transgender individuals, addressing transgender individuals in an informed manner that respects gender preferences, conducting safe and effective searches with sensitivity to unique issues facing transgender people, and processing, housing, and protecting transgender detainees.
Finally, this article reviews the responsibilities of transgender individuals during interactions with law enforcement and the importance of communicating these responsibilities to the transgender community as part of an overall strategy to improve relations and bolster trust with the law enforcement community.

**Hypothetical Incident Highlights Officer Dilemmas**
A patrol officer makes a traffic stop for speeding and the driver in the stopped vehicle appears to be a male subject, based on his distinctly masculine voice, clothing, and a full beard. However, inspection of the state-issued driver's license reveals this individual’s legal name to be Jane Doe with a sex designation as female. The subject explains that he is a transgender male in transition, and prefers to go by the name John. In this situation, several questions arise:

- How should the officer refer to the subject—Ms. or Mr. Doe, ma'am or sir, or he or she?
- Should a pat down or arrest become necessary, should this be done by a male or female officer?
- If the subject is arrested, where should they be housed in jail? Is this individual housed with the male population because of the self-proclaimed male gender identity and male presentation? Or should the individual be housed with the female population because the state-issued driver’s license designation is female?

This article will help clarify these issues and provide a courteous and professional resolution of situations like these 1) without jeopardizing officer safety or risking civil rights litigation violations; and 2) preserving the dignity and constitutional rights of the transgender individuals.

**Transgender Culture and Its Diversity**
Sex, gender identity, and sexual orientation are separate entities and, along with gender expression and legal sex, can be simply defined as follows:

- Biologic sex—how one is born (e.g., sex assigned at birth)
- Gender identity—the sex one feels or intrinsically believes oneself to be
- Sexual orientation—whom one loves
- Gender expression—how one looks and acts
- Legal sex—what is stated on government-issued identification documents

When an individual’s sex at birth differs from their gender identity, a condition known as gender dysphoria occurs (e.g., a state of mental discomfort with one’s gender). This varies in intensity and time of onset and often manifests as a desire to be treated as the other gender. In some cases, there may be a desire to rid oneself of the internal and/or external biological, physical sex characteristics. Some individuals will take hormones or revert to surgery to make their bodies match their cross gender identity, but this is not always the case.

Currently, no definitive explanation exists as to why some people, despite being biologically and genetically male or female, have the unwavering conviction that they belong to the opposite sex from that assigned at birth. However, several explanations have been suggested, including: sex hormone effects on the fetus during pregnancy,
infant and adolescent experiences, atypical brain developmental, and genetic influences (Savic et al., 2010; Zucker 2004).

Gender identity is believed to develop early in life, and counseling, aversion treatment, or psychiatric drugs have rarely been successful in alleviating severe gender dysphoria. People with this condition strive to live in a gender different from the one assigned at birth—that is, they transition from male to female or female to male. This transition may culminate in gender-affirmation surgery, often referred to as sex-change surgery.

The American Psychiatric Association and American Medical Association recognize the benefits and necessity of gender transition treatments for appropriately evaluated individuals. The overarching aim of such treatments is to help the transgender individual achieve lifelong comfort with their body and gender role. Surgeons often require transitioning individuals to live full time in the affirmed gender for at least 1 to 2 years prior to performing gender-affirming surgeries, making it likely that law enforcement personnel will encounter individuals at various stages along the transition continuum. Law enforcement personnel may encounter unexpected anatomical combinations (e.g., breasts and a penis or a beard and vagina or even a beard and pregnancy), as well as mismatches in identity documents.

How Many Transgender People Are There?

An accurate estimate of the number of transgender individuals is challenging because the transgender community, historically, has not been included in any governmental censuses. Recent estimates indicate that approximately 0.3% (approximately 700,000 individuals) of adults in the U.S. are transgender (Gates, 2011), suggesting that at some point law enforcement and members of the transgender community will meet in different settings.

Transgender Interactions with Police

The stereotypical perception of transgender individuals is that they are sexual deviants existing in the shadows of society. However, this is often based on perceptions of a few media sensationalized cases. On the contrary, thousand of transgender individuals are well-educated professionals making a meaningful contribution to society. Many transgender individuals have extraordinary talents and professional accomplishments and work as engineers, writers, scientists, physicians, pianists, computer programmers, etc., and live perfectly respectable lives.

Police officers may interact with transgender individuals for a variety of reasons, in addition to the routine policing for moving vehicle violations, etc. For example, transgender individuals are also victims of violent crime or domestic abuse, some are harassed for simply being in public, others are homeless, and a few engage in sex work because of employment discrimination. Due to the high degree of stress and anxiety the condition poses, some transgender individuals may engage in drug and alcohol abuse and some end up taking their own lives (Grant et al., 2010).

Like many other people, police officers that encounter a transgender individual for the first time might be curious initially, but then might become fearful, repulsed, be in disbelief, or become intolerant. However, experts agree that being transgender is a
reflection of the normal variation of human development and does not represent a mental illness (Coleman et al., 2011).

Overall Experience with Police Officers in Field Incidents

Accounts of harassment by law enforcement and isolated incidents of abuse have translated into a general lack of trust between some members of the transgender community and members of law enforcement (Grant et al., 2010). The results of two surveys, one in the City of Los Angeles (Bettcher et al., 2010) and one nationwide survey (Grant et al., 2010), highlight this assertion.

In 2009, the City of Los Angeles Human Relations Commission in collaboration with transgender community organizations conducted a survey of ~100 transgender individuals, the majority of survey respondents (e.g., 62%) were transgender females (e.g., male to female) (Bettcher et al., 2010). While 27% of respondents said they informed the police officer of their transgender status during the initial contact or stop, almost as many (23%) said they did not verbally inform the officers at any point. Some of the reasons cited for the lack of disclosure were fear, anticipated lack of respect, belief they would be unfairly processed, made fun of, or mistreated, and a mismatch of names or sex designation on identity documents.

When asked about the quality of encounters between transgender individuals and law enforcement in the field, approximately 58% of transgender respondents said they were verbally harassed or called the wrong name or pronoun, and 14% said they were physically or sexually assaulted or abused (see Figure 1).

The 2011 National Transgender Discrimination Survey involved a total of 6,450 transgender and gender non-conforming people from all 50 states, the District of Columbia, Puerto Rico, Guam and the U.S. Virgin Islands (Grant et al., 2010). Among those respondents who had interacted with police, approximately 1 in 5 stated they were harassed (22%) due to bias or reported denial of equal service by police (20%) and nearly half (46%) felt uncomfortable seeking police assistance.

As a result of respondents being transgender or gender non-conforming, approximately 6% stated they were physically assaulted and 2% stated that they were sexually assaulted by law enforcement. The report concluded that, for many transgender and gender non-conforming individuals, the justice system operates suboptimally from multiple perspectives and fails to adequately safeguard certain populations. To paraphrase the report, the system perpetrates injustice rather than administers justice (Grant et al., 2010).

The findings suggested that a segment of law enforcement personnel would benefit from sensitivity training and increased awareness and appreciation of gender diversity. Such training would help members of the law enforcement community improve overall interactions and communication with transgender individuals and such training may prevent discrimination during interactions between the two groups.

Transgender Individuals’ Responsibilities

Not everyone outside the law enforcement community fully appreciates the difficulties and safety issues faced by police officers during interactions with the public. As a result, some transgender individuals in the field and during processing and detainment will undoubtedly be challenging for a variety of reasons. Transgender
individuals also have responsibilities during interactions with law enforcement and their actions can positively or negatively impact the outcome. To help improve relations and bolster trust between the transgender community and law enforcement, officers may want to consider speaking at local or national transgender organizations and conferences. Some of the most important points to communicate to transgender individuals are summarized in Table 1.

**Identifying Areas of Concern - Police Interactions with Transgender Individuals**

A comprehensive report developed by the City of Los Angeles Human Relations Commission Transgender Working Group identified several key areas to improve service to the transgender community (Bettcher et al., 2010). Key areas requiring enhancement included: 1) Absence of transgender-related issues in police department’s policy guidelines and procedures; 2) police officers disrespecting, dismissing and/or abusing transgender individuals; 3) variable or dangerous housing in jails; and 4) lack of meaningful ways to hold police officers accountable and to enforce policies. The report also made practical suggestions to help improve relations between the police and transgender community (see Table 2). Clearly, these areas are not unique to the Los Angeles Police Department, and these types of problem areas are relevant to other police departments.

**Practical Suggestions and Guidelines When Interacting with Transgender People**

Police departments in numerous major metropolitan areas, including Los Angeles (Office of the Chief of Police, City of Los Angeles, 2012), New York City (The Council of the City of New York, 2013), Chicago (Chicago Police Department, 2013), Philadelphia (Philadelphia Police Department, 2013), Boston (Boston Police Department, 2013), District of Columbia Metropolitan Police (Metropolitan Police, 2007), and San Francisco (Police Commission of the City and County of San Francisco, 2003; San Francisco Police Department, 2003) have all issued guidelines on how to interact with transgender individuals. These guidelines focus primarily on three main areas: forms of address, searches, and housing detainees in jail, and are for the most part, consistent among police departments with a few exceptions (see Table 3). Clearly, smaller, local agencies may lack the resources or space to adopt all of these procedures but they are presented here as a guide to help steer local policy decisions and discussion.

It is important to respect a transgender individual’s self-proclaimed gender identity and gender expression and address the individual by their preferred name and salutation (sir/ma’am). Calling a person “it,” “he/she,” “she–male,” or “the tranny” is never appropriate in any setting. Because of its central importance to the patient’s transgender identity, the individual’s preferred name should be used consistently.

In some circumstances, the individual’s stated preferred name may differ from the legal name. Thus, an individual may wish to be referred to as a female in their interactions with officers, but are male with respect to identification documents. This may be challenging at first and processing records may need to be amended to accommodate these types of situations.

If an individual does not immediately disclose being transgender to law enforcement personnel, the individual’s presentation with respect to clothing, language, and behavior, etc., may be used to make an initial reasonable determination of gender.
That is, if a person is dressed in female clothes and presents as a woman, the person should be recognized as a woman and addressed accordingly. If the person’s gender identity is not immediately obvious, it is appropriate for the officer to ask the individual how they want to be addressed and by which pronoun they prefer to be called. When there is no self-identification or other obvious expressions of gender, the driver’s license or other government-issued identification may then be used as first proof of gender.

As with any encounter, law enforcement personnel should speak and behave courteously and professionally and at no time use demeaning language in connection with a person’s gender identity or expression, whether real or perceived. Further, no inquiry should be made regarding intimate particulars and no lewd statements regarding genitalia, breasts, or surgical status should ever be made. Obvious examples of questions or comments to avoid include, but are not limited to:

- Have you got a penis or a vagina down there?
- So what do you have between your legs?
- Have you undergone “the surgery?”

An individual’s transgender status must be appropriately noted to ensure staff members are aware of possible safety and security issues in relation to other detainees. However, disclosure of transgender status should be on a need to know basis and not disclosed to other arrestees or the general public.

While strip or cavity searches are unpleasant for any arrestee, physical exams or even the act of undressing can be especially embarrassing, distressing, and uncomfortable for transgender individuals, when anatomy differs from one’s gender identity. For this reason, officers of requested gender (by the transgender individual) should conduct necessary searches if possible.

Housing transgender detainees poses a plethora of issues, not least of which is safety. Most of the law enforcement agencies in major cities try to house transgender individuals in single cells. However, some agencies hold transgender individuals in sex-segregated facilities according to the person’s genitalia (male genitalia present = male, male genitalia absent = female), while others hold individuals according to gender identity (regardless of sex assigned at birth) unless there is a major safety concern. After appropriate searches for contraband and weapons, transgender individuals should be allowed to keep undergarments, wigs, binders (e.g., compression bandages or vests used by transmen to create a male-looking chest or a gaff to hide genitals for transwomen), and prosthetic devices.

Law enforcement agencies should consider providing training and implementing enforcement for all staff to help them improve communication with transgender individuals to avoid personal biases and assumptions, to recognize and avoid transphobia (i.e., fear and disgust of transpeople), to increase staff knowledge of and sensitivity towards transgender patients, and to avoid litigation and civil rights violations.

**Summary**

Within contemporary society, a broad spectrum of gender diversity exists that is not reflected in traditional gender stereotypes of male and female. Law enforcement personnel must be open to gender fluidity and non-traditional gender presentation, while
also understanding that being transgender is not a mental illness, but rather a normal variation of human existence.

Transgender individuals have the right to live with dignity and privacy in their chosen gender without fear of discrimination or harassment. In addition, transgender individuals are entitled to fair and equal treatment regarding their unique gender needs when interacting with law enforcement personnel.

**About the Author:** Dr. Redfern holds a doctorate degree from the University of Sheffield, United Kingdom. She completed a research fellowship at Baylor University Medical Center, Dallas, and subsequently became Research Assistant Professor at the University of Texas Southwestern Medical Center, Dallas. In 1997, she founded Redfern Strategic Medical Communications, which specializes in developing educational materials for a variety of audiences. She also serves as an educator for transgender-related issues on behalf of VCS Inc., New City, New York, and can be reached at jan@redfernstrategic.com.

**References**


Appendix

Definition of terms used in this article (Coleman et al., 2011; DSM 5 2013; Redfern & Sinclair, 2014).

**Transgender**: Broad term for diverse group of individuals who cross or transcend culturally defined categories of gender. The gender identity of transgender people differs to varying degrees from the sex assigned at birth. Some undergo surgeries or take hormones, many do not.

**Transsexual**: Refers to individuals who seek to change or who have changed their primary and/or secondary sex characteristics through feminizing or masculinizing medical interventions (hormones and/or surgery), typically accompanied by a permanent change in gender role.

**Trans man (female-to-male, F-to-M)**: Individuals assigned female at birth who are changing or who have changed their body and/or gender role from birth-assigned female to a more masculine body or role.

**Trans woman (male-to-female, M-to-F)**: Individuals assigned male at birth who are changing or who have changed their body and/or gender role from birth-assigned male to a more feminine body or role.

**Cross dresser**: People whose gender identity corresponds to their sex assigned at birth but occasionally wear clothes typically worn by the opposite sex. They do not want to live full time as members of the opposite sex or undergo gender-affirmation surgery.

**Genderqueer**: People who do not follow strictly male or female identities and roles. They often choose to present themselves as neither stereotypically male nor female, but instead present themselves as a gender-free individual, the extent of which may vary over time.

**Gender Identity**: Intrinsic sense of being male or female.

**Gender dysphoria** (clinical definition): Individuals with a marked difference between expressed/experienced gender and sex assigned at birth, a situation that causes clinically significant distress. There is often a strong desire to be treated as other gender and be rid of characteristics consistent with the sex designated at birth.

**Gender expression or role**: Pertains to external attributes, behavior, appearance, dress, etc. that are typically designated masculine or feminine.

**Gender affirmation surgery** (sex reassignment surgery, sex-change surgery): Surgery performed to change physical sex characteristics to affirm a person’s gender identity.
Figure 1. Stages of Transition: Male to Female. Gender-affirmation surgery involves removal of the testicles and creation of a vagina and labia typically using skin from the penis and scrotum. The sequence depicted may vary among individuals.
Figure 2. Stages of Transition: Female to Male. Top surgery refers to removal of both breasts. Bottom surgery may include one or more procedures such as removal of the uterus, ovaries, and vagina and, in some cases, creation of a penis using skin from the forearm, thigh, or abdomen/groin. The sequence depicted may vary among individuals.
Figure 3. Results of a survey (conducted in 2009) of transgender individuals and the quality of their encounters with the LAPD (Bettcher et al., 2010).

<table>
<thead>
<tr>
<th>Experience</th>
<th>N (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Verbally harassed</td>
<td>31% (N=28)</td>
</tr>
<tr>
<td>Repeatedly called wrong name/pronoun</td>
<td>27% (N=24)</td>
</tr>
<tr>
<td>Neutral</td>
<td>19% (N=17)</td>
</tr>
<tr>
<td>Physically abused</td>
<td>12% (N=11)</td>
</tr>
<tr>
<td>Sexually assaulted</td>
<td>1% (N=1)</td>
</tr>
<tr>
<td>Sexually abused</td>
<td>1% (N=1)</td>
</tr>
<tr>
<td>Respectful/professional experience</td>
<td>1% (N=1)</td>
</tr>
</tbody>
</table>

N refers to the number of respondents. Percentages represent percentage of responses. Respondents could choose more than one answer (total 90 answers). Other=8%, non-responses=24.
Table 1. Key points for law enforcement to communicate with transgender individuals

- Be polite and respectful in your interactions with any law enforcement officer, and remember that respect is two-way street. Officers have some discretion in making an arrest so avoid being confrontational and argumentative.
- Stay calm and collected; avoid running under any circumstances and answer questions without an attitude.
- Do not be secretive or evasive about your transgender status and avoid lying and presenting false documents. Lying may lead to an arrest.
- State up front your true legal name as well as your preferred name and gender pronoun.
- Carry a letter from doctor/therapist stating your transgender status and stage of transition.
- Keep your hands visible at all times and avoid making erratic moves or gestures.
- Do not hinder the police or resist during an arrest. If the officer suspects a weapon, allow a pat down of exterior clothing. If a crime has been committed or is suspected, officers have the right to search your person.
- Avoid physically stopping or attempting to intervene in a search.
- If arrested, avoid making excuses and remain silent.
- Memorize phone numbers of persons you might want to contact if detained in jail.
- Avoid challenging an officer about misconduct on street; instead, remember the details of interaction and then file a written complaint.

Information extracted in part from Transgender Community of Police and Sheriffs, 2012.
Table 2. Problem areas of interactions with transgender individuals and suggested resolutions.

<table>
<thead>
<tr>
<th>Problem area</th>
<th>Suggested resolutions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lack of transgender-related issues in guidelines and practice documentation</td>
<td>• Include gender identity and expression in relevant police policies, documents, forms and practices</td>
</tr>
</tbody>
</table>
| Disrespecting, dismissing, and/or abusing transgender individuals | • Implement policies/procedures to stop disrespecting behaviors  
• Ensure appropriate spoken interaction and searches  
• Prevent sexual harassment and excessive physical force  
• Prevent gender profiling, selective enforcement, wrongful arrests  
• Eliminate failure to respond to transgender individuals                                                                                     |
| Variable or dangerous housing in jails                          | • Implement a written accommodation policy that addresses safety of transgender individuals and significance of their gender identities  
• If possible, develop two segregated units for both transgender male-to-female and female-to-male non-violent detainees; if not, transgender arrestees housed in separate cells in female facility |
| Lack of meaningful accountability and enforcement measures       | • Develop, assess, and adopt stronger accountability and enforcement measures, including evaluation of any patterns of complaints from transgender individuals                                                                 |

Information extracted from City of Los Angeles Human Relations Commission Transgender Working group report (Bettcher et al., 2010).
Table 3. Compilation of transgender policies of police departments in various major cities with respect to forms of address, searches, and holding conditions of detainees

<table>
<thead>
<tr>
<th>Searches</th>
<th>Housing detainees</th>
<th>Forms of address</th>
</tr>
</thead>
<tbody>
<tr>
<td>No field searches to ascertain anatomical sex and no searches more invasive than those performed on non-transgender individuals</td>
<td>All efforts made to hold transgender individual in isolation, including in other locations</td>
<td>If person self identifies as transgender, their stated gender identity should be accepted and honored.</td>
</tr>
<tr>
<td>If weapons suspected or if officer/public safety compromised, immediate search by any officer permissible. Otherwise search conducted by officer of requested gender</td>
<td>Removal of appearance-related items (wigs, prostheses etc.) consistent with non-transgender individuals</td>
<td>Address transgender individual by preferred name (even if no legal recognition) and use appropriate pronouns for stated gender identity</td>
</tr>
<tr>
<td>If person is un-cooperative and/or no ID, search according to person’s stated genitalia (male genitalia by male officer; no male genitalia by female officer)</td>
<td>Detainees transported alone (or as only person on one side of split wagon)</td>
<td>If uncertain of gender, ask respectfully. If unresponsive, use government ID as initial proof of gender identity</td>
</tr>
<tr>
<td>Gender expression or presentation is not prima facie evidence of a person engaging in crime including prostitution</td>
<td>Some police departments house arrestees in sex segregated police facilities according to gender identity unless safety issue, then held in isolation as special category prisoner</td>
<td>Treat arrestees with due respect and courtesy</td>
</tr>
<tr>
<td>Detainee completes statement of search, then searches conducted during booking by 2 officers of requested gender if practicable; if unavailable, then by any gender</td>
<td>Other police departments hold according to transgender individual’s genitalia (male genitalia=male; no male genitalia=female)</td>
<td>Avoid discriminating against, harassing, and making demeaning or derogatory comments based on a person’s actual or perceived gender</td>
</tr>
<tr>
<td>If no stated preference, searches performed by officers of same gender as detainee’s expressed gender</td>
<td>Arrestee’s gender classified according to government ID; inconsistencies in ID and gender identity/appearance are documented as aliases</td>
<td>Avoid asking about intimate details of person’s genitalia, breasts, or surgical status</td>
</tr>
<tr>
<td></td>
<td>If arrestee undergone gender affirming surgery then male-to-female</td>
<td>Gender classified per ID, otherwise male if male genitalia</td>
</tr>
<tr>
<td>(female-to-male by male officer)</td>
<td>processed as female and female-to-male as male (regardless of sex designation of ID)</td>
<td>Juvenile transgender arrestees taken to juvenile processing center</td>
</tr>
<tr>
<td>----------------------------------</td>
<td>-------------------------------------------------------------------------------------</td>
<td>------------------------------------------------------------------</td>
</tr>
<tr>
<td></td>
<td>Under no circumstances handcuff transgender individuals to rails, bars or chairs for extended periods</td>
<td></td>
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</tbody>
</table>