



Transgender Equality Policy – Review Sept 2025

1. Why it is needed

Many organisations employ staff who are trans. Some will be transitioning in the workplace, and it is important to support these employees appropriately.

Trans people are protected under the Equality Act 2010: 'gender reassignment' is one of the nine protected characteristics.

2. Who it is for

The policy is aimed at all staff, for those who may be considering transitioning, those who have transitioned and for employees to be allies.

3. Why 'Trans Equality Policy' not 'Gender Reassignment Policy'?

Trans people should be protected from discrimination and harassment at all times, not solely when they are transitioning. Any policy must reflect that. Although the phrase 'gender reassignment' is used in the Equality Act 2010, it is now generally considered to be out-dated language.

Both the Equality Act 2010 and the Gender Recognition Act 2004 are clear that gender reassignment need not involve any medical intervention. However, the phrase is widely misinterpreted to assume that it is a medical process, and this can feed myths and misunderstandings.

4. What the Policy Covers

The policy covers a wide range of topic, it is not solely focused on arrangements for when a person transitions. It includes:

- information on the legal protections that transgender people have, including the importance of respecting confidentiality
- where to go and what will happen if someone experiences or witnesses transphobic discrimination
- advice on support for an employee transitioning at work
- information about how trans equality will be used and monitored in the organisation
- support for those with a family member who is transitioning

5. Commitment to transgender equality

The Company is committed to supporting equality, diversity and good relations in everything it does and as an employer.

The Company is committed to equality of opportunity for trans people throughout recruitment and employment, including supporting trans employees through any transitioning process.



The Company will not tolerate discrimination, victimisation or harassment on the basis of a person's gender identity, gender expression or trans status.

The Company seeks to provide a supportive environment for trans staff and to create a culture and environment where trans staff are able to thrive and are well supported during any process of transition.

The purpose of this policy is to assist managers and trans employees with practical information on workplace support.

6. Definition

'Trans' or 'transgender' describes people whose gender identity differs from their sex assigned at birth. They are umbrella terms covering people who:

- are intending to undergo, are undergoing, or have undergone gender reassignment at any stage
- identify as having a gender different from that which they were assigned at birth and are planning or have had medical interventions such as hormones or surgery
- identify as having a gender different from that which they were assigned at birth, but who are not planning any medical intervention; and/or,
- are non-binary – that is, they are not solely male or female. They may define themselves as both, neither or something entirely different. They may or not have medical interventions to align their body with their non-binary gender identity

These are not mutually exclusive alternatives.

'Transitioning' is the process undertaken by a trans person in order to bring their gender presentation into alignment with their gender identity. This often involves dressing differently, using a different name and pronoun (eg she, he or they) and changing official documentation. It may involve various types of medical or surgical treatment, although this is not the case for all trans people.

7. Employees who are Transitioning at Work

If an employee states that they are intending to transition at work, their line manager, in conjunction with other appropriate colleagues usually a member of the People team, should aim to make this process as smooth as possible. Managers should be aware that it can be an extremely difficult step for someone to approach their manager about transitioning. They are likely to worry about the response.

The Company is committed to reassuring all staff that they will be supported and respected. The transition process will be led by the individual concerned.

Individuals who require time off work to attend appointments in relation to their transition should inform their manager. Our normal policy for time off for medical appointments will apply. As far as possible, and if appropriate, we will discuss with the individual how much time is to be taken off for



gender reassignment surgery. When time off is taken for this reason, normal sick pay entitlements will apply.

9. Dress codes

Trans staff have the right to comply with any dress codes in a way that reflects their gender identity and gender expression.

11. Updating records

Electronic records will be updated in a timely manner, to coincide with the date on which the workplace transition begins. Care will be taken to ensure that records do not link back to the former name – this may entail creating a whole new email address rather than simply changing the name on the existing one, for instance. The manager and employee will work together to ensure that nothing is missed.

ID or building access passes with the correct name and a new photograph will be issued, without any replacement cost to the trans employee.

Paper records will be updated where possible. Those which cannot be updated – for instance, paper copies of references relating to the employee's recruitment – will be stored in a secure place, and clearly marked as only to be looked at by named persons.

Where names changes apply the trans employee will be required to show original documents of the change, which can be validated by an employee of their choice. This document will then be store on the employees file.

14. Discrimination and abuse

The Company has a zero-tolerance approach towards discrimination and harassment based on gender identity, gender expression or gender history. Inappropriate behaviour or language may constitute discrimination, harassment, bullying or victimisation. Discrimination including harassment, third party harassment and victimisation are covered by the Equality Act 2010. It is important that timely action is taken where misconduct occurs on the grounds of an employee's gender identity, in line with the harassment and bullying policy.

16. Support available

Trans employees have access to a range of services such as the EAP helpline which offers 121 Counselling services along with reading material and advice plus free access to the Mind Matters Kite app.

17. Legal protection for trans people

Gender Recognition Act 2004

The UK Gender Recognition Act (GRA) enables people aged over eighteen to gain full legal recognition for the gender in which they live. Applications are considered by the Gender Recognition



Panel. Once a person receives a Gender Recognition Certificate (GRC), they are legally of that gender for every purpose and have all the rights and responsibilities associated with that gender.

Employment rights do not depend on whether a person has a Gender Recognition Certificate. Employers should not ask for a person's GRC and it should never be a pre-condition for transitioning at work. To make an application for a GRC, a person needs to show they have been living – and working - in that gender for at least two years. So being asked to show a GRC as a condition of changing employment details is like being asked to show a full driving licence before you can apply for a provisional one.

The Gender Recognition Act gives anyone applying for or holding a Gender Recognition Certificate particular privacy rights. It is a criminal offence to pass on information acquired 'in the course of official duties' about someone's gender recognition, without the consent of the individual affected. 'Official duties' include employment, trade union representation or supply of business or professional services.

Equality Act 2010

The Equality Act 2010 (England, Scotland and Wales) protects against discrimination because of gender reassignment in employment and service delivery. It bans direct and indirect discrimination and victimisation. There is similar protection in Northern Ireland under the Sex Discrimination (Gender Reassignment) Regulations (NI) 1999.

The Act makes clear that it is not necessary for people to have any medical diagnosis or treatment to gain this protection; it is a personal process of moving away from the gender assigned at birth to the correct gender.

People discriminated against because they are wrongly perceived to be trans, or who are discriminated against because of their association with trans people or issues, are also protected.

18. Genuine Occupational Requirements

In the vast majority of cases, the gender of a worker is of no relevance to their ability to do a particular job. However, the Equality Act 2010 does allow for an exception where being of a particular sex is an 'occupational requirement' of that post. If this is the case for an employee transitioning at work, they will be redeployed into a suitable position.

19. Roles and responsibilities

Employee	<ul style="list-style-type: none">• Communicates with their manager and the People team about the logistics of transitioning• Reports any instances of harassment, victimisation or discrimination
Manager	<ul style="list-style-type: none">• Ensuring that colleagues are informed about the employee's transition in a manner that best suits the employee• Maintains confidentiality at all times



	<ul style="list-style-type: none"> • Supports the employee in any way that is necessary and appropriate • Ensures that the policy is upheld
People team	<ul style="list-style-type: none"> • Investigates any instances of harassment, victimisation or discrimination in line with the policy • Ensures that this policy is followed at all times • Maintains confidentiality, including securing paper documents and files • Providing trans equality training as a general part of the equality and diversity training programme • Updates People systems with any name changes
IT	<ul style="list-style-type: none"> • Updates names, titles and pronouns on email and other systems
Facilities	<ul style="list-style-type: none"> • Issuing new access cards