



# Transgender Inclusion Policy – Review Sept 2025

## INTRODUCTION

The aim of this policy is to ensure that trans individuals, or those undergoing gender reassignment, are treated with respect and are able to undertake their roles free from bullying, harassment or discrimination. It also aims to ensure that individuals' privacy, dignity and human rights are safeguarded and promoted.

Transgender is a term which refers to people whose gender identity differs from that which they were assigned at birth.

This policy applies to all employees, job applicants, workers, agency workers and contractors engaged by the Company and sets out how the Company will support an individual who intends to undergo, is undergoing or has undergone gender reassignment.

## THE LAW

The laws governing this area are the Gender Recognition Act 2004 and the Equality Act 2010.

Reassigning gender is covered by the Gender Recognition Act 2004. The prohibition of discrimination on the basis of a gender reassignment is governed by the Equality Act 2010. This ensures that direct or indirect discrimination, harassment and victimisation is unlawful against those who have undertaken, or are undertaking, gender reassignment.

## COMMUNICATION

The Company is committed to ensuring that an individual who is transitioning is supported in their decision. Any individual planning to undergo transition is encouraged to speak to their manager in confidence about the process so that the Company can provide the support required as early as possible. If the individual prefers, they may choose to speak to another manager, or a representative of the HR department.

Arrangements will be agreed in the following areas:

- Getting permission from the individual to talk in confidence to the HR department.
- When a change of name and personal details on the Company's systems should occur.
- When the individual's uniform will change.
- When the use of single sex toilets in the affirmed gender will take effect.
- Whether the individual wishes to inform colleagues and other staff or clients, and if so, what they wish to be shared, or whether the individual would prefer for someone else to do this and whether the individual wishes to be there when this happens.
- Designating a colleague who may accompany the individual on their 'first day' in work of presenting in the affirmed gender identity.

Once transition has taken place, the individual will have the opportunity to meet on a regular basis with the manager/HR representative to provide ongoing support.



We appreciate that the experience of each individual will be unique and therefore an approach which meets the individual's needs will be adopted. The individual will remain in control of the transitioning process.

### **TIME OFF WORK**

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.

### **TRAINING**

In order to provide adequate support to individuals who are transitioning, and also to ensure that our workplace maintains a culture of positive attitude, the Company will provide guidance to managers on the implications of the process in the workplace.

### **BULLYING AND HARASSMENT**

Individuals who are undergoing or have undergone gender reassignment have the right not be harassed at work. All of our staff must abide by the Company's Equal Opportunities Policy and Anti-harassment/Bullying Policy. Harassment is viewed by the Company as unacceptable behaviour and will result in disciplinary action where a complaint. Victims of harassment should raise a grievance in accordance with the Company's grievance procedure.