

Transgender and non-binary equality policy

Updated: June 2025

Purpose of policy

This policy outlines our commitment to ensuring that transgender and non-binary employees are treated with dignity and respect and are not disadvantaged in the workplace.

The policy sets out the steps we take to welcome and support transgender and non-binary employees so that they feel that they belong and can thrive.

Scope

The policy covers all employees, contractors, temporary workers and job applicants and applies to all stages of the employment relationship.

The policy accompanies our Equality, Diversity and Inclusion (EDI) policy and our Dignity at Work policy.

Failure to take account of this policy may result in disciplinary action being taken against an employee.

Our commitment

We are working to create an inclusive workplace culture where all our employees feel safe and valued, and where difference is respected. We believe that diversity and inclusion bring benefits to our organisation and that people work better when they can be themselves and feel that they belong and can thrive.

We are committed to providing a working environment that is free from discrimination, harassment and victimisation and strive to ensure that our policies and procedures covering the entire employee lifecycle do not treat people less favourably because of their sex or gender identity.

Terminology

We recognise that language around gender identity continues to evolve and that terminology is not interchangeable. Gender identity refers to a person's internal sense of their gender. This may or may not align with the sex they were assigned at birth.

Transgender is an umbrella term describing the diverse range of people whose gender identity differs from the sex that they were assigned at birth. An individual may identify as transgender but may not identify with the binary concept of woman or man.

Non-binary is also an umbrella term describing people whose gender identity is not binary (ie male or female). Some non-binary people may identify as having no gender identity or being genderless (agender), while others may identify on a spectrum between male or female or as having a gender that goes beyond being male or female. Some people are "gender fluid", meaning that their gender identity can change or may not permanently align with one gender. Sex refers to the biological and physiological characteristics that define humans as female or male. These sets of biological characteristics are not mutually exclusive, as there are individuals who possess both.

Sexual orientation, or sexuality, is about to whom someone is physically and/or emotionally attracted. There are different forms of sexual orientation, with the most common identities being "lesbian" or "gay" (attracted to persons of the same sex), "heterosexual" or "straight" (attracted to persons of the opposite sex) and "bisexual" (attracted to persons of either sex).

Managers and colleagues should respect how an individual chooses to describe themselves. Using inappropriate language and terminology can cause offence and distress and undermines our efforts to create an inclusive workplace.

The appendix to this policy provides a glossary of some of the most commonly used terms.

The law

Equality Act 2010

Gender reassignment is one of the nine protected characteristics covered by the Equality Act 2010. The Act protects a person from discrimination, harassment and victimisation if they are "proposing to undergo, are undergoing, or have undergone a process (or part of a process) of gender reassignment for the purpose of reassigning their sex by changing physiological or other attributes of sex". There is no requirement for the person to be under medical supervision to be protected. Under the Act, a person who takes time off work for gender reassignment must not be treated less favourably in respect of employment decisions, for example by being denied access to training or promotion opportunities.

The Act also protects anyone who is perceived to have the protected characteristic of gender reassignment or is associated with someone who has the protected characteristic of gender reassignment, such as an individual's partner or a friend.

An employee who treats a colleague less favourably because of gender reassignment, for example by refusing to work with them, may be held personally liable for discrimination.

Protection against gender reassignment discrimination extends to gender fluid and non-binary people.

Gender Recognition Act 2004

The Gender Recognition Act 2004 allows an individual to apply for a gender recognition certificate (GRC), which will give them legal recognition in their acquired gender and enables them to obtain a new birth certificate. The Act safeguards the privacy of an individual with a GRC by defining information relating to the gender recognition process as "protected information" and, except "in certain specific circumstances" (for example, for the purpose of preventing or investigating crime), it is a criminal offence to disclose such information without the individual's consent.

An application for a GRC will be made to the Gender Recognition Panel. Individuals are required to provide a medical diagnosis of gender dysphoria and evidence that they have lived in their acquired gender for two or more years and intend to do so permanently.

We will never ask an employee if they have a GRC or require anyone to apply for one for employment purposes.

How we support transgender and non-binary equality

We recognise that job applicants and employees are not required to tell us their gender identity or gender history. The gender in which an individual chooses to present will always be acknowledged and respected.

To promote a workplace that is inclusive of people, regardless of their gender identity, we adopt the following approach.

Recruitment and selection

We wish to attract applicants from as wide a talent pool as possible and the recruitment process is designed to be inclusive of applicants regardless of their gender identity. Except in exceptional defined circumstances, a job applicant's gender identity will not be relevant. In an exceptional circumstance where the nature of a specific role might lawfully prevent someone who is transitioning from applying, legal advice must always be sought in advance of advertising.

Hiring managers and interview panel members should not ask questions about an applicant's gender identity or history. If an individual chooses to mention this during the interview, they should be informed that we support transgender employees and assured that the disclosure will have no bearing on the outcome of the interview, will not be revealed outside the interview room or noted on the interview record.

The requirement to provide proof of identity to confirm the right to work in the UK can be particularly sensitive for a transgender applicant whose identification documentation may be in their previous names. We will always ensure that an applicant is made aware of the full range of permissible identification documents and that the process of checking is handled sensitively and with respect for the privacy of the individual.

Where an individual's documentation reveals their previous name and thereby their gender identity history, this information will be kept confidential and stored securely with the permission of the individual and in accordance with our data protection policy. The same approach will apply where an applicant is required to present qualification certificates before a job offer is confirmed and the certificates are in the applicant's previous name.

Diversity monitoring

In line with our policy on equal opportunities in employment, we will gather and analyse information relating to the diversity of the workforce for employment and promotion. Diversity monitoring enables us to identify under-representation and disparities of experience and outcomes between different groups. Monitoring data helps inform our priorities for action and provides a baseline for measuring progress.

The disclosure of personal information by employees is voluntary and employees may withdraw their consent to its processing at any time. Any information disclosed will be treated in confidence, stored securely and used only to provide statistics for monitoring purposes in accordance with our data protection policy. When communicating diversity monitoring data, we will ensure that it is anonymised to avoid identifying individuals.

Employment

An employee who is transitioning may wish to be redeployed on a temporary or permanent basis. This may be because: the individual is in a public-facing role and wishes to avoid having to answer

questions from the public about their gender identity; or the role involves particular tasks that may be difficult to undertake if undergoing a particular type of treatment (for example, hormone therapy that causes fatigue). Requests to be redeployed will be discussed with the employee and, where possible, we will seek to accommodate the employee's wishes. This will include agreement on whether the redeployment is to be temporary or permanent.

A manager should not put pressure on an individual to change jobs or make assumptions about their capability or wishes.

An employee's gender identity will not have a bearing on any employment decisions or access to benefits, except where permitted by law. For example, an individual who has transitioned but does not have a GRC may be required to disclose their gender history for insurance and pension purposes.

Where pension and insurance providers request disclosure of an individual's gender identity, we will ensure that this requirement has been checked with the underwriter and the requirement is made clear in any scheme information provided to employees. In such circumstances, the employee's written consent will be obtained before disclosing their gender history and status.

Names, titles and pronouns

We will take all necessary steps to ensure that an individual's change of name is respected. Whether intentional or not, consistently addressing a transgender employee by their previous name (known as "dead naming") is distressing to the individual and impacts on their sense of belonging.

A GRC is not required to enable someone to change their name and title and we will never ask an individual if they have a GRC to verify a change of name.

We will always respect an individual's chosen pronouns. Consistently addressing a transgender employee by their previous name and/or the wrong pronoun may amount to harassment and will be dealt with accordingly.

Updating employee records

An individual does not need a GRC to request that their details are updated on their employment records. The individual will be treated in the same way as other employees wishing to update their details. We will agree with the individual what paper and electronic records need to be changed. These will include those records that may contain names, titles and other personal identifiers such as photographs on the organisation's website and intranet.

Where an employee is absent while undergoing their transition, any records that hold personal details should be updated by the time the individual presents at work with their new identity.

Confidentiality

All records that include details of an employee's gender history will be destroyed in a secure manner, unless there is a specific reason for retaining them (in which case the employee will be made aware of this and told why). Where other people in the organisation need to be aware of the employee's transition to make a change to a particular record, we will obtain the employee's consent, and restrict the information to those who need to know.

Where there is a need to retain documentation that shows someone's gender history, this information will be stored confidentially in line with the requirements of data protection legislation.

It is an individual's decision as to whether they choose to reveal their gender status and we will respect their right to privacy. The right to privacy will apply regardless of whether the individual has a GRC.

Where an employee discloses information about their gender history or status (verbally or in writing), this will be treated as confidential. This includes any information provided to the line manager or HR. Such information will not be shared with others, unless there is a specific reason and then not without the written consent of the individual concerned. Disclosure of the gender history of someone with a GRC without their specific permission would normally be a criminal offence.

Information relating to an employee's gender status or history will not be disclosed to a third party without the individual's consent, for example when responding to a reference request.

Communication

Where an employee chooses to transition while working for us, we will work with them to agree who will be told and by whom, and when and how this will happen. The most important consideration is that the employee feels that they have control of the process and that they are safe in the workplace.

The employee may wish to tell colleagues about their transition or may prefer for this to be done by someone else on their behalf. We will encourage the individual to do what is best for them and, if the employee is not ready to tell anyone at the early stages, we will respect the employee's wishes. The employee is entitled to privacy and we will seek to protect them from intrusive enquiries.

Where an employee has a public or client-facing role, we will discuss with the individual what third parties need to know and how this should be handled.

We will be mindful of possible media interest and establish a protocol for handling media interest to ensure that:

- a transgender employee is not left to deal with this alone; and
- their colleagues understand the importance of not compromising the individual's right to privacy.

Bullying and harassment

We adopt a zero-tolerance approach to harassment, bullying or victimisation and such behaviour may result in action being taken under our disciplinary procedure.

Examples of harassment because of gender identity include:

- verbal abuse such as name-calling, threats, derogatory remarks or belittling comments about transgender or non-binary people;
- asking an individual if they have a GRC;
- jokes and banter about someone's gender identity or transgender or non-binary people generally;
- refusing to use the appropriate pronoun (for example, calling a trans woman "he") or calling the person by the name they had before they transitioned;

- threatening behaviour or physical abuse;
- intrusive questioning about someone's gender identity or transition;
- excluding a transgender or non-binary colleague from conversations or from social events;
- refusing to work with someone because they have transitioned or are open about their gender identity; and
- displaying or circulating transphobic images and literature.

Any complaints of bullying and harassment are taken seriously and dealt with promptly.

Toilets and facilities

We strive to maintain a workplace culture that is safe for all our employees and affords them dignity and respect.

We provide both single-sex toilets and gender-neutral toilets that have individual lockable rooms with washing facilities within them, to ensure choice and privacy.

Dress codes

We will agree with the employee what flexibility in our dress code may be permitted to accommodate the process of transition or where a gender-specific mode of dress would be uncomfortable for the individual.

If an employee who has transitioned or is in the process of doing so is required to wear a uniform, we will ensure that arrangements have been made to provide them with a uniform appropriate to their gender. The uniform will be available from the point at which the individual presents in their affirmed gender.

Awareness training

How discrimination can occur and the policies and procedures in place to address this form part of our wider training offer, particularly in respect of recruitment and selection and performance management training.

Information on transgender equality and gender identity is an integral part of our equality awareness training for our staff. The training references the Equality Act 2010 and all protected characteristics, including gender reassignment, and explains what constitutes discrimination and harassment.

Supporting an employee who is transitioning

We will be supportive of an employee who is transitioning.

We acknowledge that the transition process and the time it takes will be unique to each individual and that it is not always a single process. We will not make assumptions about the employee or what they need but will instead work with the individual to ensure that they have the support that is right for them.

Transitioning is a major decision and the individual may have taken years to come to this point. They may fear rejection or ridicule by their work colleagues. It is therefore vital that we support the individual so that they can continue to work without fear of discrimination and harassment.

Once we have been made aware by an employee that they will be starting, or have started, the process of transitioning, an appropriate point of contact will be agreed with the employee. That person will work with the employee to develop a confidential action plan to manage the individual's transition at work.

The plan will consider what steps to take before, during and after the employee's transition. No action will be taken without the employee's consent.

It is important to develop a plan that is bespoke to the individual employee. Some of the key issues to address are likely to include:

- when and how an individual will present at work in their affirmed gender;
- handling a request by the employee to change their job temporarily during the transition process or to move to a new role permanently;
- the point at which colleagues, especially any direct reports, will be informed and how this will be done;
- if and how third parties, such as clients, should be informed;
- how absence from work for reasons associated with transitioning (for example, for medical appointments and/or medical treatment) will be handled;
- arrangements for changing the individual's name on their personnel records, email, security badges etc;
- confidentiality; and
- dress codes and/or uniforms.

Transitioning is a process that takes time, and, to help both parties, regular review meetings will be arranged to manage the process. This will ensure that the right support is in place and enable the plan to be amended as things change. Effective support for someone who is transitioning requires dialogue, agreed action and respect.

It is important to avoid the term "choice" wherever possible, as this risks implying that being trans or gender diverse is a lifestyle choice, rather than an affirmation of the person they have always been.

Appendix: glossary

- **Acquired gender:** Used in the Gender Recognition Act 2004 to describe a person's gender after transitioning. As this is a legal term, many people now prefer to use the term "affirmed" gender.
- **Affirmed gender:** Used to describe a person's gender identity, which may be different to the sex they were assigned at birth and may involve social, legal and medical steps.
- **Assigned gender:** The gender assigned to someone at birth, based on the individual's physical characteristics. The term "presumed male/female at birth" is increasingly being used.
- **Cisgender (or Cis):** Describes someone whose gender identity matches the sex that they were assigned at birth.
- **Cisnormative:** An assumption that gender is a binary concept and that being cisgender is the norm.
- **Cross dresser:** Someone who chooses to wear clothes not conventionally associated with their assigned gender. "Cross dresser" is now used in preference to the term "transvestite", which is considered to be outdated and can cause offence.
- **Dead naming:** Refers to calling a transgender or non-binary person by their birth name and not their chosen name. Whether or not this is intentional, it can cause distress for the individual and have an impact on their sense of belonging. It is important to respect an individual's chosen name.
- **Gender or Gender identity:** Describes a person's innate sense of themselves. For example, they may identify as female, male, as having no gender, as non-binary or as gender fluid. A person's gender identity may not correspond with the sex that they were assigned at birth. Gender is increasingly recognised as not being a binary concept, but on a spectrum.
- **Gender-affirmative belief:** A belief that a person's gender identity may differ from the sex they were assigned at birth and that this is valid and should be respected. This belief acknowledges that a person's gender identity is determined by their internal sense of self, rather than their biological sex.
- **Gender-critical belief:** A belief that sex is biological, immutable, and binary. This belief acknowledges that there are sex-based rights. There have been some cases where it has been found that gender-critical beliefs may be held as a philosophical belief protected under the Equality Act 2010.
- **Gender dysphoria:** A recognised medical condition where someone experiences severe discomfort and anxiety because their gender identity does not align with the gender that they were assigned at birth.
- **Gender euphoria:** This describes the joy and relief that transgender people feel when their body matches their gender identity.
- **Gender expression:** How an individual presents their gender identity to others, for example through their appearance and behaviour.

- **Gender fluid:** Where an individual's gender identity moves between two or more gender identities in different circumstances.
- **Gender reassignment (or transitioning):** The process where an individual changes their expressed gender to live fully in the gender with which they identify. For example, a person who was assigned female at birth decides to take steps to live the rest of their life as a man. Gender reassignment does not require medical treatment and is a protected characteristic under the Equality Act 2010. For many transgender people, the terms "gender confirmation" or "gender affirmation" are now preferred to "gender reassignment".
- **Genderless or Agender:** Where an individual identifies as having no gender.
- **Intersex:** An individual who is biologically not of the male or female sex. The sex that an intersex person was assigned at birth may differ from their gender identity.
- **LGBT+:** Lesbian, gay, bisexual, transgender is a commonly used acronym. The "plus" denotes inclusion of other identities such as intersex or asexual. The acronym is often expanded to LGBTQI with "Q" standing for Queer (or questioning) and "I" for intersex.
- **Misgendering:** When a transgender person is referred to by the sex that they were assigned at birth.
- **Natal gender (or natal man/natal woman):** Used as an alternative by some people to Cisgender (or Cis).
- **Non-binary:** A term used by people who feel that their gender identity is not binary male or female. Some non-binary people may identify as having no gender or being genderless (agender), while others may identify on a spectrum between male and female, or as having a gender that is different to either male or female. Some people identify as "gender fluid" meaning that their gender identity moves between two or more gender identities in different circumstances. The terms "non-binary" and "transgender" are distinct and should not be used interchangeably.
- **Passing:** Used to describe people who are seen by others as being in the gender with which they identify. For example, a trans woman "passes" when she is seen by others as a woman, not as someone whose assigned gender is male.
- **Pronouns:** Terms people use to describe an individual or a group of people, rather than using their name or names. Pronouns are often gendered "he/him", "she/her" - sometimes neutral/unisex "they/them". A person's pronouns are not a choice but an essential part of who they are.
- **Real life experience:** The period of time that a person must live and work in their acquired gender before being given medical treatment through the NHS. In most cases, this period is between one and two years.
- **Sex:** The biological and physiological differences that define men and women. In 2025, the Supreme Court ruled that the definition of "man", "woman" and "sex" in the Equality Act 2010 refers to biological sex. The ruling states that, where someone identifies as trans, they do not change sex for the purposes of the Equality Act 2010, even if they have a gender recognition certificate (GRC).

- **Trans man (female to male):** Used to describe a person who was assigned as female at birth but identifies as male and is transitioning, or has transitioned, from female to male.
- **Trans woman (male to female):** Used to describe a person who was assigned as male at birth but identifies as female and is transitioning, or has transitioned, from male to female.
- **Transgender (or trans):** An umbrella term describing the diverse range of people whose gender identity differs from the sex they were assigned at birth.
- **Transitioning:** The steps taken by individuals to live in the gender with which they identify. These steps can be social, psychological, legal and may sometimes involve medical procedures. Each person's experience of transitioning is unique to them. Transition is not about the individual "becoming" as it is about them "gender affirming".
- **Transsexual:** Under the Equality Act 2010, a transsexual person is someone who has the protected characteristic of gender reassignment (see above). A transsexual person does not have to be under medical supervision to be protected under the Act. The term is now considered to be out of date and the more inclusive term "transgender" is preferred.
- **Transphobia:** A fear of or a dislike of transgender people. It is based on prejudice and misunderstanding and can involve verbal abuse, physical violence and other forms of harassment.