

1<sup>st</sup> May 2025

## Your Freedom of Information (Scotland) Act 2002 (“the Act”) request

Thank you for your email which was received by VisitScotland on 27<sup>th</sup> March 2025 at 3.06pm requesting information about:

*“all written material regarding advice and feedback given on Visit Scotland's trans policy since 2021 by Equality Network/Scottish Trans”.*

### VisitScotland's Response

Please find attached a draft of the document called “Trans Policy in VisitScotland”. This draft shows the track changes and comments which were provided as feedback and advice on this policy on behalf of Scottish Trans / The Equality Network.

### Your right to seek a review

If you wish to request a review of your application under either the Act or the Environmental Information (Scotland) Regulations 2004, your request should be submitted to us in writing, or another permanent format (for example e-mail or voice recording) to:

Ms Vicki Miller  
Chief Executive  
VisitScotland  
Waverley Court  
4 East Market Street  
Edinburgh  
EH8 8BG

Telephone: 0131 473 3603

E-mail: [vicki.miller@visitscotland.com](mailto:vicki.miller@visitscotland.com)

The request for a review should be received by us within 40 days of the date of this letter. Any request for a review should also set out, in as much detail as possible, the reasons why you are not satisfied with our response or the manner in which we have dealt with your application. If you are not satisfied with the result of the review, then you have the right to appeal to the Scottish Information Commissioner.

You can contact the Scottish Information Commissioner at:

Scottish Information Commissioner  
Kinburn Castle  
Doubledykes Road  
St Andrews  
Fife  
KY16 9DS

Telephone: 01334 464610

Fax: 01334 464611

Email: [enquiries@itspublicknowledge.info](mailto:enquiries@itspublicknowledge.info)

You also have the right to appeal to the Court of Session in Scotland on a point of law concerning our response.

## Trans Policy in VisitScotland (VS)

### Statement of Intent

VisitScotland is committed to creating an inclusive and safe working environment for trans people, where they are treated with dignity, kindness, and respect. This is not only to meet the equality legislation as set out below, but to go beyond that so our trans staff are able to live as themselves, and work without fear of discrimination or harassment, regardless of their legal sex or gender assigned at birth.

There are many different terms used when talking about gender identity (a person's inner sense of their own gender). People use a variety of words to describe themselves and their gender identity, and we should all respect and use each individual's preferred words.

For simplicity, this policy is using "trans" to include all whose gender identity does not match that which they were assigned at birth. It covers people who identify as trans men and trans women. ~~It also covers non-binary people, who don't identify as being exclusively male or female, and may use terms like genderqueer, genderfluid, agender and or gender non-conforming to describe themselves, including intersex people who may identify as any or none of these.~~

~~People use a variety of words to describe themselves and their gender identity, and we should all respect and use each individual's preferred words.~~ For the purposes of this policy, we have opted for "trans" as the most commonly used general term.

### Legislation

#### 1. ~~Gender Reassignment and t~~The Equality Act (2010)

1.1 The Equality Act 2010 protects people who have one of nine "protected characteristics" from facing discrimination, harassment or victimisation in employment or the provision of goods and services.

**Commented [1]:** I wouldn't include intersex people in the policy, unless you are going to specifically expand the policy quite significantly to speak more directly to the particular needs and barriers they might face. Any intersex person who was also trans would be covered, but an intersex person who isn't trans likely wouldn't be – it is better to leave this out unless this will be developed further.

**Commented [2]:** I think this bit could be a little "tighter" on EA2010 and include more on GRA2004 as referenced further in - see what you think?

## 2. The Equality Act says that you must not be discriminated against because of your gender reassignment **you are trans**

~~says that you must not be discriminated against because you are transsexual (trans) – that is your gender identity differs from the gender assigned to you at birth. For example, a person who was born female decides to spend the rest of his life as a man.~~

~~1.22.1 In the Equality Act, the protected characteristic that protects trans people from discrimination is it is known as “gender reassignment”. All trans people share the common characteristic of gender reassignment. While ~~the~~ The Equality Act uses the term “transsexual” to describe those who have the protected characteristic. ~~VS~~ uses trans as an umbrella term to describe people whose gender identity and/or expression differs from their sex assigned at birth and includes people who live permanently or temporarily in one or more genders. However, the protected characteristic applies to a wider group than the language might imply.~~

### 3. A wide range of people are protected under the Act by the “gender reassignment” characteristic

~~1.33.1 The Gender Recognition Act (2004) Equality Act says that to be protected from gender reassignment discrimination, you do not need to have undergone any specific treatment or surgery to change from your birth sex to your authentic gender. This is because changing your physiological or other gender attributes it recognises that gender reassignment is a wider personal process rather than simply a medical one. You can be at any stage in the transition process – from proposing to reassign your gender, partial transition, non-binary; to undergoing a process to reassign your gender or having completed it.~~

~~2.53.2 Anyone who is proposing to, is transitioning or has transitioned from the gender they were assigned at birth, (whether or not this involves any medical interventions), is protected by law. Protection includes people at any and all stages of their transition process.~~

~~3.3 Examples of some situations where people would be protected from discrimination due to the gender reassignment protected characteristic are:~~

- Someone thinks you are trans, for example because you occasionally cross-dress or are gender variant. This is known as discrimination by perception.
- Someone is connected to a trans person, or someone wrongly thought to be a trans person, such as their partner, or their parent. This is known as discrimination by association.
- Someone proposing to, undergoing, or having undergone gender transition at any stage (this refers to medical treatments related to transitioning) medical interventions as part of their transition
- You are connected to a trans person, or someone wrongly thought to be transsexual. This is known as discrimination by association.
- Someone who identifies as having a gender different from that which they were assigned at birth proposing to, undergoing or having undergone a process to transition but who may have decided not to undergo medical intervention. This might include someone who has changed their name, and updated some of their identity documents.
- Those who do not conform to a fixed, binary (non-binary male or female) concept of gender, but who may identify with one or more from a spectrum of gender identities including those that are fluid. Someone who is non-binary. If they are proposing to, are undergoing or have undergone transition, then they will also Under the Equality Act (2010), trans people fall under the protected characteristic of 'gender reassignment'. Non-binary and gender fluid people are now also covered under the Equality Act<sup>1</sup>

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#### **4. Gender Recognition Act 2004**

4.1 Under the Gender Recognition Act 2004, some trans people apply for a Gender Recognition Certificate (GRC), to update the sex recorded on their birth certificate and to obtain legal recognition of their gender. Trans people can update their other identity documents without a GRC.

4.2 Where a trans person has received a GRC, they have enhanced privacy rights. Disclosing their gender history, when you have obtained this

<sup>1</sup> This was confirmed for the first time in a ruling in 2020: Non-Binary People Protected By U.K. Equality Act, Says Landmark Ruling Against Jaguar Land Rover. A U.K. employment tribunal has ruled that non-binary and gender fluid people are protected under the Equality Act. 16<sup>th</sup> Sept 2020

information in an official capacity, is a criminal offence (with some exceptions, such as for criminal investigations).

4.3 Whether a trans person has a GRC or not, their gender history should be treated as confidential (and is required to be under Data Protection legislation).

4.4 A GRC is not required to have the protected characteristic of gender reassignment.

## ~~2. The Equality Act says that you must not be discriminated against because of your gender reassignment as a trans.~~

~~2.1 You may prefer the description transgender person or "trans male or female".~~

~~2.2 People assigned female at birth but living as a man may describe themselves as a "transgender man", while those assigned male at birth but living as a woman may call themselves a "transgender woman". These terms can be shortened to "trans man" or "trans woman". Some may also use the acronyms FtM (female-to-male) and MtF (male-to-female). Many prefer simply to be identified simply as a "man" or a "woman". If in any doubt it is OK to ask the trans person which, if any, they prefer?~~

## ~~2.3 A wide range of people are included in the terms 'trans' or 'transgender' and are protected under the Act:~~

- ~~Someone thinks you are trans, for example because you occasionally cross-dress or are gender variant. This is known as discrimination by perception.~~
- ~~Someone undergoing, or have undergone gender transition at any stage (this refers to medical treatments related to transitioning)~~
- ~~You are connected to a trans person, or someone wrongly thought to be transsexual. This is known as discrimination by association.~~
- ~~Someone who identifies as having a gender different from that which they were assigned at birth, but who may have decided **not** to undergo medical intervention.~~
- ~~Those who do not conform to a fixed, binary (non-binary male or female) concept of gender, but who may identify with one or more from a spectrum of gender identities including those that are fluid. Under the~~

~~Equality Act (2010), trans people fall under the protected characteristic of 'gender reassignment'. Non binary and gender fluid people are now also covered under the Equality Act<sup>2</sup>~~

- ~~Intersex people are not explicitly protected from discrimination by the Act, but you must not be discriminated against because of your gender or perceived gender.~~

~~2.4 For example, if a woman with an intersex condition is refused entry to a women-only swimming pool because the attendants think her to be a man, this could be sex discrimination or disability discrimination.~~

~~2.5 Anyone who is transitioning or has transitioned from the gender they were assigned at birth, (whether or not this involves any medical interventions), is protected by law. Protection includes people at any and all stages of their transition process.~~

Commented [3]: As above comment re: intersex people

Commented [4]: As above

### 3. Practical Guidance for Staff and Line Managers

3.1 VisitScotland is committed to equality of opportunity and values the diversity of all its managers and staff. VS commits to providing a safe and inclusive environment where everyone is enabled to achieve their potential. This commitment includes the provision of support to individuals who wish to take, or have taken, steps to ~~present themselves transition and live~~ in their authentic gender, ~~rather than the gender assigned to them at birth.~~ Furthermore, VS will not tolerate discrimination, victimisation or harassment on the basis of a person's gender identity or history. This document outlines the commitments VS has made in order to embed equality for trans staff across the organisation and provides practical guidance for staff and managers supporting trans individuals.

**3.2 VS will undertake the following practical steps, to ensure that trans staff not only are, but they also FEEL part of a supportive and inclusive work environment, and do not face discrimination on the grounds of their gender**

<sup>2</sup>~~Non-Binary People Protected By U.K. Equality Act, Says Landmark Ruling Against Jaguar Land Rover. - A U.K. employment tribunal has ruled that non-binary and gender fluid people are protected under the Equality Act. 16<sup>th</sup> Sept 2020~~

identity.

#### 4. Recruitment

4.1 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 is irrelevant. In an exceptional circumstance where the nature of a specific role might lawfully prevent someone who is transitioning from applying, legal advice may be sought in advance of advertising.<sup>3</sup>

Commented [5]: Is this example true – are trans people prevented from applying for national security roles?

4.2 Job advertisements should make clear that opportunities are open to all suitably qualified applicants. If an applicant sends a CV that indicates their gender as assigned at birth, HR and interview panels are not to discuss at interview.

4.3 Managers 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 trans 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.

4.4 The requirement to provide proof of identity to confirm the right to work in the UK can be particularly sensitive for a trans 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.

***[DQ for VS only, █████ – could we assign a dedicated HR person to access their Oracle records i.e. █████, and? to cover for absences?]***

4.5 Where an individual's documentation reveals their previous name and thereby their gender 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

<sup>3</sup> A rare example would be an applicant for a role in GCHQ, one that could expose them to potential blackmail dealing with countries who may hack into records or access sensitive data and pose a national security risk.

required to present qualification certificates before a job offer is confirmed and the certificates are in the applicant's previous name.

## **6. Equality Monitoring**

6.1 In line with our policy on equal opportunities in employment, we will gather and analyse information relating to the diversity of the workforce and applicants for employment and promotion. Equality monitoring enables us to identify under-representation and where there are barriers to inclusion. This helps inform priorities for action and provides a baseline for measuring progress. Gender identity is included among other personal characteristics. There is on the Hub a page explaining why we collect equality data, and a VS Way Data Graphic which highlights each category, including Gender. See link:

<https://visitscotland.sharepoint.com/sites/VisitScotland/SitePages/Equality-Monitoring-at-VS.aspx>

6.2 The disclosure of personal information by employees/job applicants is voluntary and employees may withdraw their data from their Oracle record 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 / policy on processing special categories of personal data. When communicating monitoring data, we will ensure that it is anonymised to avoid identifying individuals.

## **7. Transitioning in the Workplace**

7.1 Paid special leave will be given for employees to attend transition-related appointments and treatment. These absences will not be counted in relation to absence monitoring, included in absences for references, taken into consideration for performance monitoring or, for instance, during redundancy procedures.

In addition, trans colleagues are entitled to the same sickness absence and pay as other colleagues.

Many people have to travel a long distance for appointments, and these may be given at short notice. People may need reduced hours or duties, or other changes to usual working arrangements, for a temporary period following some treatments. Managers will be as flexible as possible to accommodate this.

7.2 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 will 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 temporary or permanent.

7.3 A manager should not put pressure on an individual to change jobs or make assumptions about their capability or wishes. A manager should highlight the Hybrid Working Policy that may well be useful either long term or temporarily as they ~~go through the transition phase~~ are transitioning.

7.4 An employee's gender identity history 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 Gender Recognition Certificate (GRC) may be required to disclose their gender history for insurance and pension purposes. In such circumstances, we will handle such information in line with our data protection policy.

7.5 Where pension and insurance providers request disclosure of an individual's gender identity history, 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.

## **8. Names and pronouns**

8.1 We will take all necessary steps to ensure that an individual's change of name is respected. A GRC is not required to enable someone to change their name and we will never ask an individual if they have a GRC to verify a name change. We will always respect an individual's chosen pronouns. Consistently addressing a transgender employee by their previous name and/or an inappropriate pronoun may be regarded as harassment and will be dealt with accordingly.

8.2 Where a person's legal name does not match their new name, their new name should be used on all documentation, such as e-mail, phone directory,

company identification card or access badge, name plate, etc., except where records must match the legal name, such as on payroll and insurance documents. In everyday written and oral speech, the new name and pronouns should be used when the employee is ready.

**8.3 Note on pronouns:** If a co-worker is transitioning and you are not certain which pronouns to use, it is appropriate to respectfully ask what name and which pronouns you should use. In general, it is considered insensitive to refer to someone by the wrong pronouns once you have established which set of pronouns ~~he or she~~they prefers.

## 9. Updating employee records on Oracle

9.1 An individual does not need a GRC to request that their details are updated on their Oracle 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 records need to be updated. These will include those records that may contain names, titles, and other personal identifiers such as photographs on the organisation's website and intranet.

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

**Commented [6]:** Unsure on this one – what is meant by this? Given the amount of time transition might take, seems unlikely that someone would be off for the duration (and also unsure what “completing” transition would mean!)

## 10. Confidentiality

10.1 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.

10.2 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. *The information will be held electronically in a secure environment (for example, password protected) that can be accessed only with the consent of the individual concerned. Only named individuals will be allowed to access this information and those individuals will*

*be made aware that breaches of confidentiality could be unlawful and result in disciplinary action.*

10.3 Care will be taken to ensure that any search of the organisation's records by others will not inadvertently reveal an employee's gender history. It is an individual's decision whether or not to reveal their gender status and we will respect their right to privacy. The right to privacy will apply regardless of whether or not the individual has a GRC.

10.4 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. Inappropriate disclosure of the gender history of someone with a GRC without their specific permission would result in a disciplinary offence in VS and would also normally be a criminal offence.

10.5 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.

## **11. Communication**

11.1 Where an employee chooses to transition while working for us, we will work together with the employee 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 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.

***[See Appendix 1 for an Action Plan Guide for Line managers and Appendix 2 for further information]***

## **12. Bullying and harassment**

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

Examples of harassment against transgender people include:

- verbal abuse such as name-calling, threats, derogatory remarks or belittling comments about transgender people.
- Verbally challenging a trans person re their choice of toilet or bathroom that causes them embarrassment anxiety, and stress, see 14.1
- asking an individual if they have a GRC.
- Jokes, gossip, and banter about someone's gender identity or transgender 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 colleague from conversations or from social events.
- refusing to work with someone because they have transitioned
- displaying or circulating transphobic images and literature.

12.2 VS will act on complaints brought by trans people, or their representatives, where these policy commitments are not being honoured. Any complaints of bullying and harassment will be taken very seriously and dealt with promptly. All employees are made aware of our policy on investigating claims of bullying and harassment and the procedures in place for handling complaints. We will also publicise our position on bullying and harassment to any third parties with which we engage. Harassment or bullying of staff because of their (perceived) gender identity, or trans status will not be tolerated by VS. Where appropriate, VS will pursue investigatory and disciplinary action against perpetrators of bullying, harassment, or victimisation.

### **13. International Travel**

13.1 Where there is a possibility of working overseas, we will be alert to any issues that may arise in local jurisdictions where the law does not protect against discrimination because of gender identity. We will conduct a risk assessment and discuss the situation with the employee to agree an outcome.

### **14. Single-sex toilets and facilities**

14.1 We will support a transgender employee's right to use the toilets and facilities appropriate to their gender from the point at which the individual declares that they are living their life fully in that gender. In some cases, the individual may wish to use a single-occupancy toilet during their transition, but they must not be pressurised to do so, and this should not be seen as a long-term solution. It is discrimination to force a trans person to use the accessible toilet if they do not wish to, but they should be given the opportunity to use a private toilet especially early in their transition if that is at all possible.

14.2 We will agree with the employee when they wish to start using the facilities appropriate to their affirmed gender and how this should be communicated to colleagues if they so wish. Any concerns raised by others will be dealt with promptly and sensitively and harassment of the individual will not be tolerated.

#### 15. Customer facing staff and dress codes

15.1 There is no reason why an employee who is transitioning should not continue in a customer facing role although if there is a specific venue that the colleague feels more comfortable working in managers and the HRBP will work with the person to find a solution that meets the needs of both the employee and the organisation. This may include redeploying the person to work within a line management structure or team they feel more comfortable transitioning within. Although this cannot be guaranteed all effort will be made to ensure that the person is deployed to a venue or team where they feel most safe, supported, and comfortable.

15.2 If a customer facing trans employee is required to wear a uniform, VS has a gender neutral uniform for our ICentre staff. Where there are a range of uniform options, staff of all genders can wear any appropriate uniform, including trans staff. ~~but if that changes VS will ensure that a uniform will be available appropriate to their gender and from the point at which the individual presents in their affirmed gender.~~

**Commented [7]:** Think it's best practice to not have 'male' or 'female' dress codes – either something is appropriate for the workplace or not. So have suggested a reword, see what you think!

#### 16. Promoting Trans Equality – Training

16.1 VS will include gender identity issues in equality training and raise awareness of the importance of using trans people's chosen name and

pronoun(s). VS welcomes trans staff groups and networks from other public bodies to engage with us and will encourage celebration of trans calendar events and engagement with the LGBT+ Staff Network Group.

16.2 VS commits to ensuring all marketing & publicity materials, literature and images on our social media, our websites, reflects the diversity of our staff and we will include trans issues in our published Equality Mainstreaming Reports every two and four years accordingly.

16.3 None of our training courses online, in the classroom, or content will not rely on, or reinforce, stereotypes or assumptions about trans people.

### **17. HR and Healthcare**

17.1 VS recognises that trans people may not hold the full range of documents reflective of their new affirmed name and gender. In circumstances where the organisation requires official confirmation of a person's identity subject to legislative requirements, staff will be given the option of providing more than one type of official identification. Suitable options include a statutory declaration of name change, deed poll, driving license, passport, or birth certificate. This process VS commits to undertaking in confidence with a high degree of sensitivity.

17.2 VS commits to supporting staff undergoing medical and surgical procedures related to gender transition. We can also use Occupational Health as a means of support in obtaining adjustments, be they temporary or permanent, to trans staff during this period. We will also commit to asking staff which adjustments they need, we will not assume what we should do, we will always be led by the trans person themselves.

### **18. Support for employees with a family member who is transitioning**

18.1 If an employee is supporting a family member who is transitioning, they may need to take time off to attend appointments and treatment or give assistance following surgical procedures. Some of these may be at short notice and may involve travelling a long distance. Managers will be as flexible as possible to accommodate this as special paid leave.

### **19. Developing a confidential action plan - see also App 1 below.**



**Transgender identity - Transition template discussion document**

This form provides a template for meetings between a manager and an employee who plans to transition and sets out key areas relating to the transition process which it would be helpful for the employee and manager to discuss and agree actions on.

This form is part of the organisation policy and guidance for transitioning for employees and managers. The transition process should be employee led as far as possible and it is for the individual employee to decide how this form can assist and be adapted where required. The manager and employee should jointly sign it after every meeting or agreed change/addition to the form. The manager should ensure that this form and any information relating to the employee’s transition process is stored confidentially and password protected.

It is recommended that the information should be reviewed regularly at least every three months (or more regularly during key parts of the employees’ transition) or as agreed with the employee.

| <b>Support needed</b>  | <b>Notes</b> |
|--|--------------|
| Level of support required from manager: <ul style="list-style-type: none"> <li>• Manager availability during key transition events</li> <li>• Frequency of meetings</li> </ul> |              |
| Is further support required from OH, HR, LGBT+ employee network, or Trade Union.   |              |

| <b>Plans for transition</b>   | <b>Notes</b> |
|---|--------------|
| Where possible set out a timeline with agreed dates   |              |
| Date of intended change recorded for systems activation e.g. email / employee and pay records etc: <ul style="list-style-type: none"> <li>• Name / identity change</li> </ul> |              |

| <b>The job and work environment</b> | <b>Notes</b> |
|-------------------------------------|--------------|
|                                     |              |

|  |  |
|--|--|
| Are any job changes required during the transition process; what are these and when do they need to take effect.                           |  |
| Job role. Can this be fulfilled during transition? If not: Do adjustments need to be considered? What are the timescales relating to this? |  |
| Is a health and safety risk assessment required?   |  |
| Uniform/PPE - date of change and any transitional arrangements (if relevant)   |  |
| Timing and use of toilet and changing facilities.  |  |

| Changing Records   | Notes |
|--|-------|
| <p>Manager and employee should make a list of the records which need to be changed. Agree the date for records to be changed, who needs to be involved and <b>confidentiality must be maintained</b>. Express consent should be sought where confidential information is required to be shared with others.</p>  |       |
| <p>A sample list is set out below.</p> <ul style="list-style-type: none"> <li>• Employee Identity card</li> <li>• Employee Photos</li> <li>• Contact details (internal and external information)</li> <li>• Email address</li> <li>• Work based internet details</li> <li>• Work based social media details</li> <li>• Voicemail</li> <li>• IT systems</li> <li>• HR records</li> <li>• Manager/service area records</li> <li>• Pension records</li> </ul> |       |

| Communications   | Notes |
|--|-------|
| <p>Manager and employee should make a list of work contacts who will need to be informed of the change. They should agree the specific nature and content of the communications, who should be included, timing, how the information will be shared and who should tell the identified contacts.</p> |       |

|   |  |
|---|--|
| <p>A sample list is set out below.</p> <ul style="list-style-type: none"> <li>• Immediate team and colleagues</li> <li>• Other contacts in the business</li> <li>• Other contacts outside their business area</li> <li>• External contacts/Stakeholders/Industry</li> <li>• HR/Payroll/Oracle</li> <li>• Pension</li> </ul> |  |
|---|--|

| <b>Awareness raising with close teams/colleagues</b>  | <b>Notes</b> |
|---|--------------|
| <p>Manager and employee should consider whether there are any further awareness raising or training needs requirements and how these might be delivered including timing.</p> |              |

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| <b>Time Off/Absence from Work</b>  | <b>Notes</b> |
|--|--------------|
| Time off required for medical intervention (if applicable). <ul style="list-style-type: none"> <li>Dates if known?</li> </ul>  |              |
| Other time off requirements. Dates if known?   |              |
| Sickness absence recording process. This is in line with VS Sickness Absence Policy.   |              |
| Is a referral to Occupational Health required? <ul style="list-style-type: none"> <li>Let employee know that they can access confidential counselling/support through the wellbeing helpline in Occupational Health</li> </ul> |              |
| Is a health and safety risk assessment required?   |              |

| <b>Needs following transition</b>              | <b>Notes</b> |
|--|--------------|
| Level of support required following transition |              |
| Frequency of meetings                          |              |

**Signatures:**

Line Manager (print name) .....

Line Manager (signature).....

Date .....

Employee (print name) .....

Employee (signature).....

Date .....

**Details of all meetings during and after transition**

| Date | Comment | Action | Date of Next Meeting |
|------|---------|--------|----------------------|
|      |         |        |                      |
|      |         |        |                      |
|      |         |        |                      |
|      |         |        |                      |
|      |         |        |                      |
|      |         |        |                      |

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## Appendix 2

### Further support

Contacts for further external information for employees and managers.

1. <https://www.lgbthealth.org.uk/> Working to improve the health, wellbeing and equality of lesbian, gay, bisexual, transgender (LGBT) people in Scotland
2. <http://www.agender.org.uk/> a:gender This is the support network for employees in government departments and agencies who have changed or need to change permanently their perceived gender, or who identify as intersex.
3. <https://www.equalityhumanrights.com/en/commission-scotland> Equality and Human Rights Commission This provides guidance on the Equality Act 2010 and has a range of research reports relating to transgender issues.
4. <http://www.gendertrust.org.uk/> The Gender Trust provides advice, information and support on gender identity issues to individuals and employers.
5. <https://www.stonewallscotland.org.uk/help-advice/transitioning> Stonewall – provide LGBT information and advice to individuals and organisations, they are also involved in political, lobbying. They also have useful reference documents see link:
6. <https://www.equality-networkscottishtrans.org/> Equality Network/Scottish Trans Alliance Scottish Trans is the national trans equality and inclusion project of the Equality Network. The Equality Network is a leading national charity working for lesbian, gay, bisexual, transgender and intersex (LGBTI) equality and human rights in Scotland

7. <https://www.gov.uk/government/organisations/government-equalities-office> Government Equalities Office This has responsibility across the UK Government for equality strategy and legislation.

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