Trans Equality Statement and Procedures

1. Commitment to Trans equality

King’s College London is committed to equality of opportunity and values the diversity of its staff and student body. The College will not tolerate discrimination, victimisation or harassment on the basis of a person's gender identity. The College seeks to provide a supportive environment for trans’ staff and students and to create a culture in which its trans members will not face discrimination, harassment or exclusion and that individuals are supported in any process of transition.

It is the right of the individual as to whether they wish to disclose their gender identity and if they choose not to do so, their right to privacy will be respected. If staff or students need advice on any issue relating to their gender identity, they can contact the College’s Counselling Service for advice and support (see Appendix 4 for more information).

This statement is consistent with the College’s duties with regards to trans staff and students under the Equality Act 2010 (see Appendix 6) which strengthens and consolidates legislation in this area. The information in this statement is based upon the Equality Challenge Unit’s (ECU): Trans staff and students in higher education (revised 2010). This provides more detailed guidance on trans issues and is available to download from the ECU’s website.

2. Definitions

Trans is an umbrella term to cover people whose gender identity/expression differs from their birth sex and/or perceived binary gender and includes people who live permanently or temporarily in one or more genders. The term trans can be used without offence to describe people who:

- are undergoing gender reassignment at any stage

- identify as someone with a different gender from that in which they were born, but who may have decided not to undergo medical intervention

- present permanently or temporarily in the clothing typically worn by the other sex.

The College seeks to provide a supportive and welcoming work/study environment for all trans staff/students and to accommodate their needs to the best of its ability. However it is important to note that the legal protections offered in this area only apply to those who have proposed, started or completed a process to change their sex and/or gender. In other words, individuals who wish to live permanently in a different sex and/or gender to that assigned to them at birth – with or without medical intervention.

Where this statement refers to ‘gender identity’ it also covers the binary identity of people living in the gender of their birth and the more fluid identity of many trans people.

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1 For the purpose of this policy statement, the term ‘trans’ is not a term covering a fixed concept of gender, but describes a whole range of gender identities including those that are very fluid.
Definitions of some commonly used trans-related terminology can be found at Appendix 4.

3. Implementation of trans equality

3.1 The College has taken a number of steps to ensure that its trans staff and students are part of a supportive and inclusive work/study environment, and do not face discrimination on the grounds of their gender identity:

- Students will not be denied access to programmes, or progression to further programmes of study, and will receive fair and equal treatment during their programme of study regardless of their gender identity.

- In providing accommodation for students, any concerns or issues which are raised by trans students will be handled sensitively and fairly by the Accommodation Service.

- Programme content will not reinforce any stereotypical assumptions about trans people or contain transphobic material.

- Trans status will be seen as an irrelevant distinction for the purpose of staff recruitment, selection and promotion, access to training and benefits etc.

- Staff and students who wish to disclose their trans status or give notification of their intention to transition have the option to approach a single, central point of contact in order to coordinate any arrangements required, including the update of College records and systems with any new name/gender (see Section 5 for more information on the relevant procedures).

- In circumstances where the College requires official confirmation of a person’s identity, staff and students will be given the option of providing more than one type of official identification such as a driving licence, passport, statutory declaration or birth certificate as not all trans people will hold the full range of documents reflective of their preferred name/gender.

- Staff and students undergoing medical and surgical procedures related to gender reassignment will receive positive support from the College to meet their particular needs during this period (see Appendix 4 for specialist sources of support).

- The College will be flexible in relation to dress codes to ensure they do not reinforce binary gender stereotypes. However dress codes set by professional bodies will need to be taken into account.

- Where students have been provided with uniforms to wear during their programme/placement, they will have the option to request a set of new uniforms that conform with preferred gender at no extra charge.

2 Except where there is a legal requirement to provide a specific document, such as proving the right to work in the UK.
A trans person will have access to single-sex facilities e.g. toilets and changing rooms according to the gender by which they identify and the College has a legal and ethical duty to support them while they are at work/study. They should not be bullied or harassed into using either the facilities of their birth gender or the accessible/disabled toilets. Such behaviour will be dealt with under appropriate College policies: see the Guidance on Harassment, Bullying and Discrimination for Students (students) and the Dignity at Work Policy and Procedure (staff) (see also Section 3.2). A number of single occupancy toilets on campus have been converted into gender-neutral toilets to be marked with a WC sign. These can be used by staff and students who are uncomfortable using a gender-specific toilet. A map of these toilets will be available shortly at: http://www.kcl.ac.uk/aboutkings/governance/equality/help/index.aspx

Where a person needs to take time off work or study for medical assistance because of gender reassignment, they should not be treated any less favourably than if the absence was due to another cause such as sickness or injury.

The College will respect the confidentiality of trans staff and students and will not reveal/share this information without the prior agreement of the individual concerned.

3.2 Harassment

Harassment or bullying of staff and students because of their gender identity or perceived gender identity will not be tolerated. Such behaviour will be dealt with under the College’s Policy on Harassment, Bullying and Discrimination for students (students) and/or the Dignity at Work Policy and Procedure (staff). Actions or behaviour which may constitute harassment include: name-calling, derogatory jokes or offensive comments, and inappropriate questioning. Transphobic materials, in the form of notes, graffiti, music or speeches, will not be tolerated.

The College will provide a supportive environment for staff and students who wish for their trans status to be known. However, it is the right of the individual to choose whether they wish to be open about their gender identity. To ‘out’ someone, whether staff or student, without their permission is a form of harassment and will be treated as such.

3.3 Promotion of trans equality

In order that its trans members feel they are in a safe and secure environment and can transition openly the College will:

- include gender identity issues in equality training.
- welcome and provide appropriate facilities for trans student and staff groups/consultation networks
- ensure that its publicity materials and literature reflects the diversity of its staff and students.
- consider trans issues in its published equality objectives.
4. Procedures

4.1 Staff and students who disclosed that they are trans, or give notification of their intention to transition have the option to approach a single, central point of contact, the Equalities Officer in order to coordinate any arrangements required, including the update of College records and systems with any new name/gender. Alternatively they may choose to approach HR, their manager, student services or a personal tutor or another member of College staff whom they feel comfortable disclosing to, who will need to consider their needs and take an appropriate course of action.

4.2 A meeting should be arranged with the individual to discuss the transition and agree:
- any important dates/deadlines
- an action plan covering any arrangements that need to be made, who will be responsible for these and who else needs to be involved
- any changes required to College records and systems to reflect the individual’s preferred gender and name (if applicable), e.g. College identification cards, contact details, payroll details, email address and login etc and when and by whom these will be coordinated (see Appendix 1 for a checklist of issues to consider)

Each individual’s circumstances will be unique so it is important that any agreed action plan is (where possible) tailored to their needs and that a flexible approach is used. Additional meetings may be required to update on progress and consider any further issues.

4.3 The individual should provide written notification of their intent to transition (see Appendix 2 for examples of the wording that could be used). In order to change a name on all College documents and systems, evidence will be required (see section 3.1 bullet point 6 above). It is unlawful to request medical evidence or further proof such as a gender recognition certificate (see 4.6 below). In some cases the individual may also have to show an existing form of identification (such as a staff or student identity card in their original name/gender) to prove their identity, before the changes are made. No records can be changed without the permission of the staff member or student concerned.

4.4 In relation to written records, it is important to ensure that the individual’s file reflects their current name and gender. Any material that needs to be kept that refers to a person’s trans status, such as records of absence for medical assistance, birth certificate and documentation of name change, should be placed in a sealed envelope and attached to their new file and marked ‘Confidential: personnel manager/head of student services only’ and should only be viewed if it is required to perform a specific function and with the permission of the person concerned.

4.5 Students who choose to change their name on records held by the College should also notify the loan company, their local authority, sponsor and bank to ensure payments are not delayed. Staff will need to notify their bank and pension scheme.

4.6 A Gender Recognition Certificate gives the holder full legal and social recognition of their acquired gender. It is unlawful for an employer to disclose information related to a person’s trans status except when permission has been granted by the individual
in question, or where the individual cannot be identified. A Gender Recognition Certificate enables the holder to obtain a new birth certificate and to marry someone of the opposite sex/gender or have a civil partnership with someone of the same sex/gender.
Appendix 1

Checklist of issues to consider when supporting an individual through transition at the College

1. What is the likely timetable for transition including dates for any medical intervention? Identify where possible the dates for any name/gender change on records and systems, use of facilities (toilets, changing rooms), notification of relevant others.

2. Which documents, systems and identification cards will need to be changed?

**ID cards**
- King’s ID/library card
- KCLSU/NUS cards, fitness centre/gym membership card
- Placement ID cards

**Electronic systems**
- SITs records – via the Compass
- ISS onspace profile
- Learning platform access
- Outlook
- Global desktop
- Email address
- Departmental systems
- HR database
- Payroll and pensions
- Academic biographies
- Welfare/disability/counselling records
- Committee minutes and records
- College telephone/email directory

**Paper files**
- Departmental records
- HR records
- Assessment and Records Centre/Academic Centre records
- Personal tutor/supervisor records
- Door signs

**External records**
- Student loans company/local authority
- Bank account
- Pension provider
- Insurance policies

3. Who needs to be informed and how would the individual like them to be informed (e.g wording/mode of communication to be used in order to manage reactions and respond to any queries)?

- Manager
4. Will the individual require any time off for medical intervention and rehabilitation and what processes/support/adjustments might be possible to ensure they remain on their programme of study/in employment, or can return when they are rehabilitated?

5. Will there be a need to provide information about trans issues, policy and legislation for managers, colleagues or fellow students (e.g. around the use of language and terminology, single sex facilities, the provision of new uniforms etc.)?

6. Is there a need for a follow up meeting or a further meeting involving other key members of staff?
Appendix 2

Example wording for written notification of intent to transition

A) Student

Dear ………

I am enrolled at King’s College London as [Former Name], student number [your student number].

I wish to amend my student record, ID card, university email address and any other reference to my name, gender and title in any King’s College documents and systems to reflect my preferred gender identity. Therefore, I wish henceforth/from [a specific date] to be known as [preferred name] and my gender or sex recorded as [Female/Male/Other]. I understand that my records will be updated accordingly.

I understand that a new student file will be created in my new name and any documents referring to my former name [Former Name] and gender [Assigned Gender] will be marked as ‘confidential’ and not released without my permission, including this notification of intent, which will be kept in a sealed envelope.

Signed
______________ on [Date]

B) Staff

Dear ………

I currently work as [job title] in the [Department/Directorate/Division/School] at King’s College London and am currently known as [Former Name], payroll number [your payroll number].

I wish to amend my staff record, ID card, university email address and any other reference to my name, gender and title in any King’s College documents and systems to reflect my preferred gender identity. Therefore, I wish henceforth/from [a specific date] to be known as [preferred name] and my gender or sex recorded as [Female/Male/Other]. I understand that my records will be updated accordingly.

I understand that a new staff file will be created in my new name and any documents referring to my former name [Former Name] and gender [Assigned Gender] will be marked as ‘confidential’ and not released without my permission, including this notification of intent, which will be kept in a sealed envelope.

Signed
______________ on [Date]
Appendix 3

Guidance and good practice for assisting trans staff and students

- Remember that everyone’s experience will be unique – some individuals might be undergoing a full legal and medical transition, whilst others might be content to have no medical intervention.

- Where possible - do not draw conclusions regarding someone’s gender from their appearance.

- Use the appropriate pronoun in all circumstances – if you are uncertain ask the individual what they prefer. Individuals may also prefer to use ‘they’, ‘them’, ‘their’ which are non-gender specific pronouns.

- Use an individual’s chosen name in all circumstances – you can check how the person would prefer to be addressed and in what contexts.

- In a situation where an individual is choosing to disclose to you, offer them privacy and try not to imply time constraints as the circumstances could be very sensitive for them.

- Respect people’s privacy and do not pry into their past.

- It is not appropriate to ask about an individual’s transition unless you are considering ways to minimise the impact on their work/study life at the College.

- Due to social stigma, trans individuals may face a great deal of psychological strain which can negatively impact on their mental and physical health e.g. self harming. Ask individuals whether they are receiving an adequate level of support/counselling and encourage them to explore sources of additional help if not (see Appendix 4 for further sources of support).

- Do not tell others about an individual’s trans status without their consent.
Appendix 4

Terminology

Trans – a term widely used in the UK developed in a political context to refer to a diverse and inclusive community of people that include part-time cross-dressers to transsexual people who undergo gender reassignment surgeries.

Transgender – an alternative term used to describe people who live part or all of their lives in their preferred gender role. They may use hormonal treatments to change their body, but they will generally not seek to undergo gender reassignment surgeries. Transgender can also be used to refer to cross-dressers and transvestites.

Transsexual – describes those who seek to undergo gender reassignment, including genital reconstructive surgery where possible. A person who is transitioning from female to male (FTM) is often known as a trans man, and a person transitioning from male to female (MTF) is often known as a trans woman.

Intersex – refers to people with both female and male chromosomes and/or sex organs. Some intersex people will identify as trans, and may choose to undergo gender reassignment surgeries in adulthood to enable them to live in their preferred gender.

Sex/gender – are terms used to denote chromosomal and biological differences, which could be clearly male or female or more ambiguous.

Gender role/expression – involves a person’s outward manifestation including appearance and/or behaviours. The degrees to which they are expressed vary according to traditional notions of masculine or feminine roles or behaviour.
Appendix 5

Useful resources

At the College

Equalities Coordinator contact details
http://www.kcl.ac.uk/aboutkings/governance/equality/contactus/equality.aspx

King’s Counselling Service
http://www.kcl.ac.uk/campuslife/services/counselling/index.aspx
King’s has a counselling service located on the 3rd floor of the MacAdam building. Those who wish to access it need to complete a confidential self-assessment form, which can be submitted online. Students or staff who are considering transitioning with the help of the NHS will be advised to request an appointment with the counselling service’s consultant psychiatrist as they are able to provide a referral directly to the NHS Gender Identity Clinics.

King’s LGBT Society http://kingslgbt.co.uk/
Welfare Support email: support@kingslgbt.co.uk
Offers support, social opportunities and advice to all Lesbian, Gay, Bisexual and Trans (LGBT) students at Kings, and are fully inclusive of trans students across the spectrum. Use their Welfare Support email as a first point of contact to obtain links to the wider trans communities, advice on LGBT issues or for a space to talk through issues with someone in a similar situation. Membership is free and confidential.

KCLSU LGBT Liberation Officer LGBTstudents@kclsu.org
The Liberation Officer’s role is to sit on the KCLSU Council and advocate on LGBT issues.

King’s Health Centre http://www.kcl.ac.uk/campuslife/services/health/index.aspx
The Health Centre is able to assist with some trans specific needs. Whilst not always necessary, the Student Health Centre will be able to run blood tests at the request of a GP, with the results available in 6-10 days. These are usually done during the Sit and Wait Clinic, which is run daily from 11:00 to 13:30.

Whilst NHS pathway Gender Identity Clinics will generally take and analyse blood samples for the endocrinological monitoring necessary for hormone therapy at their own endocrinology departments, tests for private treatment can be done for free at the health centre.

Eventually NHS prescription on hormone therapy can also be directed and issued through your GP at the Health Centre.

External to the College

Gender Identity Research and Education Society (GIRES) – the society initiates, promotes and supports research, particularly to address trans issues.
http://www.gires.org.uk/


Galop – Charity which works to reduce the incidence of homophobic and transphobic hate crime in Greater London  
[www.galop.org.uk](http://www.galop.org.uk)


Gender Trust – support organisation for people with gender identity issues  
[www.gendertrust.org.uk/](http://www.gendertrust.org.uk/)

NRG Central – Central London-based LGBT youth group providing weekly one to one support on any issues for under 25s  
Email: nrg@tht.org.uk Tel: 020 7803 1684 or 07771 858 057

Press for change – Trans Rights organisation [transequality.co.uk/default.aspx](http://transequality.co.uk/default.aspx)

Spectrum – a support group for the trans community  
[http://www.spectrumlondon.org.uk/about.htm](http://www.spectrumlondon.org.uk/about.htm)

Trans London – a discussion forum for the trans community  
[http://www.translondon.org.uk/Home.html](http://www.translondon.org.uk/Home.html)

Forum on Sexual Orientation and Gender Identity in Post-School Education (Forum) - Guidance on trans equality in post-school education  
Appendix 6

Equality Act 2010

Background
The Equality Act 2010 harmonises anti-discrimination legislation and strengthens its provision to support the advancement of equality.

Protected characteristics
Under the Act, gender reassignment became a protected characteristic, with enhanced legal protections offered to those who are covered by the legal definition, i.e. individuals who have proposed, started or completed a process to change their sex and/or gender – with or without medical assistance. People who are perceived to be transgender or who are associated with someone who is transgender are also protected.

Prohibited conduct in relation to gender reassignment includes:
- Direct discrimination: this occurs when a person treats another person less favourably because they are covered by the legal definition of gender reassignment.
- Indirect discrimination: occurs when a policy, criterion or practice which applies in the same way to everyone has an effect which particularly disadvantages someone with who is covered by the gender reassignment definition, unless the person applying the provision can justify it as a means of achieving a legitimate aim.
- Harassment: three types of harassment are outlined:
  - unwanted conduct which has the purpose or effect of creating an intimidating, hostile, degrading, humiliating or offensive environment for the complainant, or violating the complainant’s dignity;
  - unwanted conduct of a sexual nature
  - treating a person less favourably than another person because they have either submitted to, or did not submit to, sexual harassment or harassment related to sex or gender reassignment.
- Victimisation: occurs when one person treats another less favourably because they have asserted their legal rights in line with the Act, or helped someone else to do so.

People undergoing gender reassignment are also protected against discrimination due to absence from work. Where a transgender person is absent from work because of gender reassignment, they should be treated no less favourably than if the absence was due to another reason such as sickness or injury.

Public sector equality duty
The Act introduced a new Public Sector Equality Duty which applies to gender reassignment as well as other protected characteristics. The duty requires public bodies to take proactive steps to embed equality into their activities by having due regard to the need to:
- eliminate discrimination, harassment, victimisation;
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- foster good relations between persons who share a relevant protected characteristic and people who do not share it.