

## Women Uniting

### Questions

**1 Do you have any comments on the proposal that applicants must live in their acquired gender for at least 3 months before applying for a GRC?**

Yes

**If yes, please outline these comments.:**

It is entirely reasonable to expect applicants to live in their acquired Gender for the present two years with full medical support and access to psychological and therapeutic services to ensure that they are fully confident of their decision. To reduce this time to 3 months risks undermining service provision which has already been identified as woefully inadequate. By the NHS's own admission a diagnosis of Gender Dysphoria is a complex process requiring in-depth assessment by two or more specialists over a period of time. 3 months is not long enough. Paying attention to improving the current process would make more sense. Given the growing number of both detransitioners or those who regret their transition and the huge spike in ROGD in teenage girls, any shortening of the process could lead to further mistakes being made.

With regards to safeguarding, the current gate-keeping, though reportedly experienced as unnecessarily invasive by those wishing to transition, is absolutely necessary to protect women and girls from men who could use the system for abusive purposes.

The original reform was suggested to streamline aspects of personal administrative mismatch for the small number of people who did transition. Now that gender ideology is in an entirely different place and in a state of considerable confusion and conflict as to what is required with the needs of trans sexuals conflicting with the needs of transgender individuals conflicting with the needs of non-binary individuals - the whole thing needs thought through again. Furthermore since biologically and medically sex is fixed at birth and all legislation and data collection is based on existing definitions of the meaning of man, woman, Sex and gender - bringing in self-declaration would create a massive legal conflict.

The Bill should reject the principle in full.

**2 Do you have any comments on the proposal that applicants must go through a period of reflection for at least 3 months before obtaining a GRC?**

Yes

**If yes, please outline these comments.:**

As mentioned above the current thorough medical process should be retained to ensure a person considers the full ramifications before signing any legal documents. The reforms would dramatically speed up the process of applying for a legal sex

change, as well as removing all forms of gate-keeping designed to prevent abuse of a system that was originally intended to help a very small number of people with a rare medical condition.

There is no actual need for a new system - particularly when reforms in other countries are yet to prove successful. 'International best standards' are hotly disputed. There is no evidence that reforms in other countries have worked. The much vaunted Yogyakarta principles are seriously flawed and being promoted globally as if they are in fact already fully operational whereas they are simply the ideas of a specific group of men and are being challenged by women's groups all over the world. This situation needs fully examined against standards and principles which are independent of any lobby groups or vested interests. A committee who has not checked out the provenance of these proposals when it takes an amateur half an hour to unearth some seriously worrying vested interests - would be negligent of its duty of care.

### **3 Should the minimum age at which a person can apply for legal gender recognition be reduced from 18 to 16?**

No

#### **If you wish, please give reasons for your view.:**

This is an adult decision and should not be made during the crucial maturation phase of adolescence. Young people who wish to be the opposite sex are frequently placed on an experimental medical pathway which leads to loss of sexual function, infertility, and lifelong medication. Current research shows that, for the vast majority of children, these feelings of gender dysphoria resolve with maturity. The causes for both the rapid increase in children seeking medical help and detransitioners (those who return to their original sex having been through the medical route) needs to be investigated before any law change extends the right to legally change sex to young people.

In particular the statistics around the number of girls choosing to transition rather than to live happily as a same-sex attracted young woman need serious examination. There is a virtual disappearance of support for Lesbians and again a very powerfully ideologically driven and well-funded lobby group -Stonewall-originally set up to support same-sex attracted people, pushing now the concept that people are attracted to gender identity, not sex. This has led to the formation of a new organisation LGB Alliance which seeks to support same-sex attracted people. Without a youth culture reflecting back at you an option which you recognise, the chances are you will not realise you are in fact a same-sex attracted woman. Also the "cotton ceiling" is a reality and there are academically verified examples of girls being pressured into accepting a man as a sexual partner through the confusing notion that a man who has transitioned socially but not physically and is still attracted to women is "lesbian" Sexual orientation in Women usually settles in early 20s. If a young girl is told she is a boy as a gender non-conforming teen she will never get to find that out.

The vast number of detransitioners are Lesbian.

#### **4 Do you have any other comments on the provisions of the draft Bill?**

Yes

##### **If yes, please outline these comments.:**

Since according to the consultation paper (section 2.13) our current legislation fully meets European law, there is no requirement for it to be reformed. A medical diagnosis of gender dysphoria should be the only grounds for allowing someone to switch the sex on their birth certificate. Only people with this rare medical condition and who have been through a sincere, professionally monitored medical process should continue to have this right.

The Government has failed to take into account the legislative and social consequences of changing the meaning of 'man' and 'woman' from a biological definition to one based on a self-declared feeling. There is plenty of evidence that taking this stance has already been detrimental to women's and children's rights. To pursue it further would be a failure of safeguarding.

#### **5 Do you have any comments on the draft Impact Assessments?**

Yes

##### **If yes, please outline these comments.:**

The Impact Assessments are not fit for purpose. They do not follow the Scottish Government's own standards of looking at the possible consequences of any law or policy change, and incorrectly state this Bill will have no adverse impact on the female sex. They are not thorough, comprehensive or evidence-based. It is clear from the list of Women's groups consulted with that there is no diversity of opinion. This happens all the time due to the stranglehold of certain well-funded lobby groups who have been able to roll out training and create bespoke policies on this subject. They are the "go to" organisations but do not speak for all.

However - researchers and those tasked to investigate cannot be expected to know that there is a breadth of opinion to be sought. Given that several groups have raised the alarm it would be again negligent to fail to take these real concerns on board.

Our group represents Women from all the political parties all of whom have Women's declarations signed by thousands of women and men extremely concerned about this issue. Additionally, since International Women's Day we now have a joint petition which is gaining signatures all the time. Should you wish to see the concerns of ordinary citizens about this issue it is a very quick focus group exercise.

No-one I know wants this Bill. Consign it to the dustbin of history. Start over with all the facts at your fingertips. Avoid lobby groups funded by big pharmaceuticals and get it right. Find effective measures to improve the lives of Trans and non-binary people. Ones which help them without undermining hard won existing protections for Women and girls.

Furthermore - this would make no sense happening in Scotland only and would impact on the whole of the UK. Did anyone impact assess that?