

Archdiocesan Secondary Head Teacher Association

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.:

There needs to be a balance between making something less onerous and making something so accessible that an appropriate amount of supported discernment about a decision cannot be provided.

We would have grave concerns about this proposal being approved given the long lasting implications which could result from such a short timeframe for living in the acquired gender. This, coupled with the possible reduction of the legal age requirement has the potential to result in a number of young people making a life-changing decision at a vulnerable stage in their development. There is significant research that supports that full brain development is not achieved until around the age of 25, yet this proposal would allow such a decision to be taken well in advance of this. Surely, this has to be considered prior to any change in legislation? The recent guidelines issued from the Scottish Sentencing Council follows research saying imbalances in brain development explain risk-taking and emotionally driven behaviour and that this should make us consider the age at which young people are psychologically ready for prison. Surely we cannot be suggesting that on the one hand young people are mature enough at 16 to make permanent and life-altering decisions whilst simultaneously saying that they do not reach psychological maturity until age 25?

This is a major concern causing significantly higher levels of stress and anxiety for any vulnerable person reducing the timescale within which they are able to operate. A 3-month period will not provide enough time for all matters to be carefully and thoroughly considered.

At the very least, the age limit should remain at status quo and not be lowered.

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.:

We would fully support an extension to the period of reflection due to the gravity of the decision being taken and the significant implications which would arise from such a decision. Three months of reflection is insufficient to prepare for such monumental decisions – for anyone of any age. There are no guarantees that

the support required to inform such a decision can be delivered within a twelve-week period and I would state that this is the case for both surgical and non-surgical interventions. Three months is an insufficient timescale given the implications of the decision on physical, mental and emotional health of, in many cases, individuals who are already very vulnerable.

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.:

Absolutely not. With the physical and psychological changes taking place in a young person's body at the age of 16 there are a huge number of variables to be considered. The reduced timescale being proposed complicates this further. The prospect of young people aged 16 being permitted by law to change gender and undertake surgical interventions to support this is deeply concerning and I would consider it to be a dereliction of duty of those approving the reduction. Again, there is a wealth of incontestable evidence that support the 're-booting' of the brain during adolescence, with full development being achieved in a person's mid-twenties. To allow this reduction would put young people at significant risk of mental ill-health, not to mention to psychological and physical complications should they engage in surgical interventions.

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

Yes

If yes, please outline these comments.:

We feel that the reduction in the legal age from 16 to 18, coupled with the reduction in the time that applicants must live in their acquired gender, is putting people's physical and mental health at risk. The notion that such a significant decision can or should be taken within such a short timescale is of real concern. As Catholic Head Teachers, we are compassionate and supportive of all of our young people, which includes those coming to terms with a variety of gender related questions. The wider issues of gender reassignment amongst those aged 16 and under however, is not only an issue for those of us who lead denominational schools, it should also be a major concern to anyone involved in education or the wellbeing of our country's young people and we should think seriously about our responsibilities to protect them. We think the reasoning and the timing behind the changes are worrying - a quick fix to defining gender/humanity. (Are there not more pressing issues to be addressed such as protecting the HWB of people of all ages and genders via robust regulation of social media sites etc.?) Feels like 'cheap TV'. We would much rather have improved support for the physical emotional and mental wellbeing of a person.

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

Yes

If yes, please outline these comments.:

We have huge concerns over the impact that the proposed changes to the bill will have on those who wish to acquire a different gender. Firstly, we do not believe that gender is fluid or changeable. However, where gender dysphoria is experienced, significant support should be afforded to the person experiencing it. The nature and form of this support surely requires much more reflection and time to deliver than a three month period would allow.

As a country, we already have more young people with mental health challenges and self-esteem issues than we are able to support. Surely we should work harder to support them in addressing their problems and challenges with compassion, care, respect and resilience. However, we must also take cognisance of the strong evidence with regards to brain development and ensure that this is factored into decision-making and into the proposed bill. The implications pertaining to surgical and non-surgical interventions, in terms of the potential consequences experienced by a person who may feel in the future that they have made wrong decision, or perhaps has failed to understand the permanence of their decision, should not be ignored. Neither can the evidential link that this has to suicidality. Again, the impact of this on the individual, their families, communities and indeed the country, would be unimaginable.

The implications for any school (but especially Catholic and other Faith schools) are concerning - bureaucracy; adaptations to buildings etc. whilst people transition etc. and breaches of GRR legislation. Consideration needs to be given also to parental choice to send their child to a Catholic school and the faith values this represents. Are Catholic schools then under 'attack' based on incorrect perceptions of our faith values? In addition, has there been thought given to teachers/student teachers as employees going through this process and the implications etc. for this?