

NHS Greater Glasgow and Clyde

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?

Not Answered

If yes, please outline these comments.:

Yes – NHSGGC feels the rights to self-determine your gender identity without medical supervision would be best considered on a case by case basis. Application of a 3 month period of living in your acquired gender appears to be an arbitrary qualifier for inclusion.

Staff in NHSGGC's Gender Identity Clinic reflected that they have worked with patients who have changed position on their gender reassignment after a period of 6 or 7 months or more. The team felt it was important to clarify the pathways for medically supervised gender reassignment treatment were separate from the rights of trans people to apply for a gender recognition certificate.

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.:

Yes – NHSGGC considers the application of a 3 month cooling off period to be an arbitrary qualifier for completion of the process. As with question 1, the decision to proceed with the application should rest with the individual and be considered on a case by case basis.

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

Yes

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

Yes – NHSGGC considers the minimum age should be reduced from 18 to 16 in line with rights afforded to young people across a range of opportunities for legal recognition. This would be applied through consideration of application on a case by case basis.

Staff in NHSGGC's Gender Recognition Clinic suggested that younger people accessing services may be more likely to re-consider their decision to undergo a medically supervised reassignment journey. In line with this, the team felt it is important to clarify that the pathways for medically supervised gender reassignment

treatment were separate from the rights of younger trans people to apply for a Gender Recognition Certificate and that provision of a certificate would not alter current arrangements within Gender Identity Clinic services.

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

Yes

If yes, please outline these comments.:

Yes

NHSGGC's Gender Identity Clinic Team considered the proposed provision of GRCs without a requirement to undergo medical supervision may lead to raised patient expectations that clinical services will follow once a GRC is provided. The team expressed the importance of highlighting the separation between successful application for a GRC and the application of robust governance standards for gender identity treatment. The team envisaged situations where patients with GRCs would not meet the required supervised standards for GIC services.

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

Not Answered

If yes, please outline these comments.:

NHSGGC were pleased to see a robust draft EQIA of the Gender Recognition Reform Bill Consultation. The evidence returned is valuable in contributing to local decision making processes when there is a need to consider balancing the rights of trans people and non-trans people in provision of services.