

Women Matter

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.:

The government needs to define what is meant by acquired gender. What does living in your acquired gender mean.? Who decides what an acquired gender is?

What is the criteria?

If there is no in depth assessment of the person's wish to become another sex/gender how can government ensure that the person is committed to it and is actually being truthful. What would a truthful statement mean in law if it is the person who decides based on a feeling?

We are concerned about someone being able to change 'sex' when women already have rights as a sex. This would mean that the rights would be in competition.

Government has refused to accept that there would be an issue with this. Particularly worrying as the Equality Act is a reserved matter. If a trans woman is a woman then what is a woman under the Equality Act. We are clearly not the same but government would have us believe/have to accept that we're. This has a direct impact on the protected characteristic of sex. What is the rush for someone to get a certificate? This would be problematic for gatekeeping and ensuring that people were making the best decision for themselves.

We are concerned about the speed of this.

It would leave the process open to abuse

The 3 month waiting time shows that the government sees there must be some risk.

The lack of medical or psychological oversight is concerning given the consequences for the individual and vulnerable women and girls.

The government's consultation document is sadly lacking in research and empirical evidence to make these changes.

There is absolutely no justification in law for allowing someone to change their sex on a birth certificate without a diagnosis of gender dysphoria. As people are already free to express their gender as they wish they do not need to change their birth certificate to do so. Without the need to be seen by a doctor could open the floodgates for all men who loosely identify as trans women or trans gender instant access to the legal rights of women. This is a major human rights breach by this government and we as a group state that this Bill, if it became law, would be unlawful.

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.:

Not having a diagnosis means you're not going to get support and counselling.

Current medical and psychiatric support should be retained. There should still be a need for evidence. More than 3 months would be required for such an important final decision with legal implications.

A gender panel should still sit but who would be on it? What would their criteria be?

Their qualifications? Their knowledge base. Would they be impartial?

Self declaration of sex should not be embedded in law

Gender identity is too new to be put on statute book without considering its impact on other legislation. (Cart before the horse)

We don't feel govt should legislate for people who maybe don't fit social stereotypes. Most young people grow through and out of identity crises. Watchful waiting is an important method of managing adolescent crises of identity. The government could do more to support young people than just affirm and offer a quick fix. If govt ignore the importance of this they could be setting themselves up for lots of retrospective legal action by young people later on. Young people cans still identify as they please without the additional burden of making a legal declaration at such a young age that they are expected to stick to for the rest of their lives.

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.:

It should be the job of government to encourage young people to be healthy and to become confident adults whatever their views and feelings. A quick fix this is not.

Men want to be feminine not necessarily women. Women want to be masculine not necessarily men.

There are serious safety issues for women and girls from men who are autgynephiles but are seen as transgender when they are men who get sexual excitement

from dressing and behaving like women. This is becoming more and more apparent in public life.

If embarking on transition people should take their time.

There has been no research done by government, beyond discussions with trans groups and women's groups reliant on funding. They have also taken information from a paper by a pro trans doctor that was really about arguing for not having single sex spaces!

There are so many potential health issues with transitioning like sterility, infertility, health and wellbeing as hormones can have a detrimental effect on short and long term health such as osteoporosis. In addition hormones treatment can affect mood, identity, growth. Far better that government should put money into more support services, education and mental health. The default should not be that gender replaces sex.

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

Yes

If yes, please outline these comments.:

No mandate in last election

Sex exceptions in EqA are being ignored by organisations and businesses Govt has encouraged public services to be trans inclusive to women's detriment and women have been mostly affected by this, therefore the govt is promoting questionable legal changes that are potentially in breach of women's human rights.

Gatekeeping is a major issue for women

The govt has done no research into behaviours pre and post transition.

The govt has done no research into the impact of young girls having to share spaces with boys, or playing sports. The default seems to be that girls are the ones who have to accept these changes with no complaint.

The govt has not consulted with or listened to women who have knowledge of trans women in women's prisons. We also know that despite what some groups like SWA, Rape Crisis and Engender say there are women working within these organisations and women who use these services who are not happy with these changes (even without changes to the GRA) so govt should be asking why these women feel unable to speak out and many of them have already had their own experience of abuse so know from experience how important single sex spaces are. Gay rights, sexual orientation are being hijacked by trans groups for ideological purposes.

Man and woman appears to be at risk as actual terms.

The govt's (mis) management of this whole process has created a situation where women can no longer meet safely to talk about their issues, organisations like Glasgow Women's Library are cancelling women meeting, academic are being shut down. Govt need to be pulling back from this and trying to regain the confidence of women in society.

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

Yes

If yes, please outline these comments.:

Impact assessments are not fit for purpose

Deeply flawed, ignored prison governors, results of Women and Girls Scotland report
Organisations already abusing single sex provisions

Police, prisons, courts already treating trans people as the sex they identify

Women's sports at risk

Govt has not asked women who use these services. The service providers have not asked women who use these services

This Bill has created pressure on women's orgs to conform to this legislation

Government should be encouraging people to reject sex stereotypes not automatic affirmation.

There is a growing number who transition then detransition. Govt is ignoring research and information that would inform the process. Only listening to groups and information that backs up self declaration.

No research on impact on children of believing in gender identity

Govt wearing blinkers. This is not progressive legislation. It is a breach of women's human rights.

For our group, unless the govt can evidence that women's sex based rights will not be affected by this amendment to the GRA then it should not go ahead and govt would be in breach of our human rights. As many women have said if anyone can identify as a woman in law then the class of female people ceases to exist.

Woman is being changed to mean gender identity rather than a sex category. This is unacceptable. We are incredulous the govt refuses to see this. The GRA

should remain for people who have made a commitment to changing gender and

there should be checks and balances and that if there are changes they should

be lawful and not impact on existing legislation. Sex under the EqA is biological sex

not gender. If the govt progresses with this Bill and it is passed successfully it

will be challenged. In its current form it is eminently challengeable.