



## INTERIM TRANS, INTERSEX AND GENDER NON-CONFORMING PEOPLE: POLICY

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### Note:

**This policy reflects an interim position, pending further guidance from the Equality and Human Rights Commission (EHRC) and the Office for Students (OfS). It conforms to the EHRC interim update on the UK Supreme Court judgment (25<sup>th</sup> April 2025). It replaces prior policy statements across City St George's and is effective immediately. It is intended that an Equality Impact Assessment be carried out in relation to the revision of the policy which will assess its impact on people with all protected characteristics. This policy is subject to further change without notice.**

### 1. Purpose of the Policy

City St George's works to provide a place of study and work where there is a culture of respect for diversity and human rights and where all staff, students and other stakeholders feel valued and respected as set out in its Equality, Diversity, and Inclusion Policy. City St George's values 'We Care, We Learn, and We Act' are reflected in our policies. City St George's will act in accordance with the law.

City St George's, University of London is committed to the inclusion and equality of trans, intersex and gender non-conforming (TIGNC) people and to creating a culture in which TIGNC inclusion and equality of opportunity is fostered and in which unlawful discrimination, harassment or victimisation based on a person's gender identity and/or gender expression is not tolerated.

The purpose of this policy is to specifically set out how City St George's commits to supporting TIGNC students, colleagues and other stakeholders, and how they are protected from discrimination, harassment and victimisation. This commitment is, of course, extended in a similar fashion to all protected characteristics.

In line with the law, its regulatory obligations, and its Royal Charter, City St George's is committed to taking reasonably practicable steps to secure freedom of speech within the law for its staff, members, students and visiting speakers, who shall have freedom within the law to question and test received wisdom, and to put forward new ideas and controversial or unpopular opinions, without placing themselves at risk of being adversely affected as a result. ***For the avoidance of doubt, nothing in this Policy should be construed as impinging on or intending to impinge on or restrict the lawful exercise of freedom of speech and/or academic freedom. Neither should this Policy be interpreted as in any way limiting or restricting the rights of individuals holding gender-critical beliefs.***

For further clarity please see the Interim Statement by the President on Freedom of Speech.

For staff, this policy applies (but is not limited) to advertisement of jobs, recruitment, and selection; training and development; opportunities for promotion; conditions of service; benefits, facilities and pay; health and safety; conduct at work; grievance and disciplinary procedures; and termination of employment.

For students, this policy applies (but is not limited) to access to programmes; gaining qualifications; placements; trips; housing; sport and recreation opportunities including Students' Union activities; student support and student services; and all aspects of student life.

This policy also applies to recruitment, offers and admissions.

For any queries or concerns relating to this policy and its implementation please contact [edi@citystgeorges.ac.uk](mailto:edi@citystgeorges.ac.uk).

## 2. Equality, Diversity and Inclusion Statement

City St George's, University of London is committed to promoting equality, diversity, and inclusion in all its activities, processes, and culture under its Public Sector Equality Duties and the Equality Act 2010. This includes promoting equality and diversity for all, irrespective of any protected characteristic, working pattern, family circumstance, socio-economic background, political belief, or other irrelevant distinction.

## 3. Definitions

This policy and the guidance will use several terms with which you may not be familiar. Key terms used throughout this policy include:

**Trans** – An umbrella term to describe people whose gender is not the same as, or does not sit comfortably with, their biological sex as assigned at birth. Trans people may describe themselves using one or more of a wide variety of terms, including (but not limited to) transgender, transsexual, gender-queer (GQ), gender-fluid, non-binary, gender-variant, crossdresser, genderless, agender, nongender, third gender, bi-gender, trans man, trans woman, trans masculine, trans feminine and neutrois.

**Intersex** – A term used to describe a person who may have the biological attributes of both sexes or whose biological attributes do not fit with societal assumptions about what constitutes male or female. Intersex people may identify as male, female, or non-binary.

**Gender** – Often expressed in terms of masculinity and femininity, gender is principally culturally determined and is generally assumed from the biological sex as assigned at birth.

Please note that other terminology related to this policy are explained in [Appendix 3](#) of the policy.

## 4. Scope

The (Interim) Trans, Intersex and Gender Non-Conforming People: Policy along with additional guidance, demonstrates City St George's, University of London's commitment to the inclusion of Trans, Intersex and Gender Non-Conforming (TIGNC) people as staff members and students. This policy applies to everyone who visits, works, or studies at the University, and more broadly, anyone who is affiliated with City St

George's, University of London. This includes staff, students, contractors, and visitors, regardless of race or ethnicity, biological sex, gender reassignment, disability, sexual orientation, age, religion or belief, pregnancy or maternity status, marriage and civil partnership status or socio-economic background.

The originating policy on which this interim policy is substantially based has been developed with and reviewed by the TIGNC Working Group comprising of TIGNC students, staff and the wider TIGNC community. Responsibility for the policy and the delegated authority rests with the Vice-Chancellor & President (advised by the EDI Board).

City St George's welcomes and includes TIGNC staff and students in the activities and experiences offered at City St George's, as it does to all, equally and without regard to protected characteristic.

## **5. Policy Principles & Key Practices**

City St George's is committed to creating a working, learning, cultural and social environment that is based on dignity and respect, where difference is valued and celebrated, enriching our community. We aim to ensure all staff and students are supported in being able to reach their full potential, to contribute fully and derive maximum benefit and enjoyment from their involvement in the life of the University. Our commitment is not only to meet the requirements set out by the Equality Act 2010, but to also strive for the University to be a sector leader in EDI best practice, where all students, staff and stakeholders feel seen and heard.

To achieve this, City St George's lays out the following aims:

- To place the trans, intersex and gender non-conforming person at the heart of decision-making relevant to actions that might particularly affect them.
- To ensure that people have their rights to privacy and confidentiality adhered to.
- To create a supportive, respectful, and nurturing environment for all people within the City St George's community.

City St George's asks staff and students to consider the adoption of inclusive practices which may include, but are not limited to:

- 1) beginning events, modules, meetings, etc., by people introducing themselves by name and pronouns
- 2) not making assumptions about anyone's gender identity just by looking at them or seeing their name on documents
- 3) using gender-neutral language with/about people you do not know, and avoiding terms like 'Sir', 'Madam', 'young lady', etc. Gender neutral pronouns include 'they/them/theirs'.
- 4) using gender neutral terms to address groups might include 'everyone', 'folks', 'students', 'staff' or 'colleagues'
- 5) using the name, title, pronouns, or gender indicated by an individual whether you are talking with them or about them. If you are not sure how someone would like to be addressed or described, it is okay to ask

- 6) using inclusive language in its publications, internal and external communications, social media and website
- 7) when addressing instances of discrimination, exclusion or harassment, reflecting the needs of the members of the TIGNC community in decision-making and actions
- 8) ensuring that people have their rights to privacy respected; this can include (but is not limited to) not divulging historical information (including previous names, genders, pronouns, etc.) about an individual without their consent; this includes during referencing

None of these inclusive practices should be understood to restrict the proper exercise of freedom of speech and expression.

City St George's will not tolerate discrimination, harassment or victimisation based on a person's gender identity and/or gender expression (or other protected characteristic, including gender critical beliefs), whether this be coming from staff, contractors, students or visitors to City St George's. Such behaviour is unlawful.

City St George's provides, as it is required to do, facilities (including toilets and changing facilities) with access limited according to biological sex. It may further limit access to facilities and services where this is necessary and proportionate to secure the autonomy, or privacy and dignity of the two biological sexes. Where it does so, it will always attempt to provide readily accessible all-gender facilities and services as a practical alternative. We will make every effort to ensure clear and appropriate signage to these facilities.

All staff with student-facing roles, as well as all staff in HR, Occupational Health and/or with line management responsibilities are encouraged to attend EDI training. All new staff are invited to complete the EDI eLearning module (online) and Trans Awareness: The Basics (online). These can be found at [Equity, Diversity & Inclusion training | City St George's, University of London](#).

## **6. Bullying and Harassment**

City St George's commits to treating all staff, students, and other stakeholders with respect. City St George's will treat any complaint of harassment or bullying seriously and it will be thoroughly investigated in line with the institutional complaints procedures. In cases where bullying/harassment by a member of City St George's staff or student are alleged to have taken place, City St George's will commence the relevant disciplinary process.

City St George's has policies, procedures, and guidelines in place for situations where harassment and bullying have taken place or where allegations are made.

The test for bullying and harassment has both subjective and the objective elements, in accordance with the Equality Act 2010. For illustration, the individual themselves felt humiliated – subjective, and that it was reasonable in the circumstances for the speech to have that effect on that individual – objective. The relevant circumstances for considering cases of bullying and harassment include the institution's duties to secure freedom of speech and academic freedom.

## Students

The latest versions of the [Student Harassment and Bullying Policy](#) and [Student Sexual Misconduct Policy](#) can be accessed via the [Harassment and Bullying](#) page of the Student Hub. Students who feel they are being discriminated against by a member of City St George's staff or student on grounds of their gender identity or gender expression should raise the matter under the [Student Harassment and Bullying Policy](#). If the complaint is substantiated, [City's Student Disciplinary Regulations](#) or [Staff Disciplinary Procedure](#) may be invoked. Confidential support is available to staff and students affected by bullying and harassment in the workplace through the City St George's Dignity and Respect Adviser Scheme. A network of trained volunteers is available to assist by acting as a sounding board, exploring options available and helping with the understanding of City St George's policies and procedures. Bullying & Harassment Advisors can be contacted directly by phone or email. Dignity and Respect Advisors can be contacted through the staff and student hub. For EDI-related reports (anonymous and identifiable), we encourage students to use the University's [You Report We Support](#) system.

## Staff

City St George's staff who feel they are being discriminated by a fellow member of City St George's staff on grounds of their TIGNC status, gender identity or gender expression should raise the matter under the University's [Staff Grievance Procedure](#). If the complaint is substantiated, the [Disciplinary Procedure](#) may be invoked. Confidential support is available to staff and students affected by bullying and harassment in the workplace through the City St George's Dignity and Respect Adviser Scheme. A network of trained volunteers is available to assist by acting as a sounding board, exploring options available and helping with the understanding of City St George's policies and procedures. Dignity and Respect Advisors can be contacted through the staff and student hub. For EDI-related reports (anonymous and identifiable), we encourage staff to use the University's [You Report We Support](#) system. .

## 7. Governance Requirements

The Vice Chancellor & President, supported by the University's Senior Leadership Team, is responsible for ensuring this policy is implemented and monitored. Ultimately, University Council (Governing Body) is accountable for ensuring the University complies with its legal obligations under the Equality Act 2010, including the general duty to have due regard to:

- Eliminating discrimination, harassment and victimisation
- Advancing equality of opportunity
- Fostering good relations with students, staff and stakeholders

The University's Office for Institutional Equity and Inclusion (OIEI), in consultation with relevant University committees and stakeholders, is responsible for developing and promulgating best practice to support meeting these legal requirements. If you have any queries about this policy document or have a confidential enquiry, please contact the OIEI team at [edi@citystgeorges.ac.uk](mailto:edi@citystgeorges.ac.uk).

**This Policy is not a standalone document and must be read in the context of the framework of policies that the University has adopted in order to meet all its obligations in respect of equality, diversity, inclusion, freedom of speech and academic freedom. This includes our Charter,**

**Statutes and Ordinances. The power to make binding institutional policy is not delegated to Schools or Departments.**

In the light of a rapidly changing legal and policy environment this policy is subject to ongoing change. It will be otherwise reviewed every 3 years.

This policy is communicated through:

- The University Policies website
- Staff emails to all employees
- [Human Resources pages on the Staff Hub](#)
- References in the University staff induction process
- [City St George's Students' Union](#)

This Policy should be read alongside the following policies, procedures, guidelines and local protocols:

- [Quality Manual](#)
- [Student Charter](#)
- [Equality, Diversity, and Inclusion Policy](#)
- [Student Harassment and Bullying Policy](#)
- [Freedom of Speech Code of Practice](#)

## **8. Guidance**

This Policy is supported by two additional pieces of guidance:

- Supporting Trans, Intersex and Gender Non-Conforming Staff: Procedures
- Supporting Trans, Intersex and Gender Non-Conforming Students: Procedures

Use these guidance documents for more information about supporting a person who is trans, intersex and/or gender non-confirming including through their transition.

### ***Transitioning at the University***

A person's gender transition can take many forms. Transition is an individual process that can include (but is not limited to) social, medical, and administrative transition and often transition has no end point. For many Trans and Gender Non-Conforming people, transition is a lifelong journey. City St George's endeavours to support staff and students who are transitioning.

### **Students**

TIGNC students requiring leave for transition care are covered by two existing policies:

- For short-term leave, they are covered by the [Extenuating Circumstances Policy](#).
- For long-term leave, they are covered by the [Interruption of Studies Policy](#).

For students, this should be discussed between the individual, their programme director, personal tutor and course officer, where necessary.

### **Staff**

City St George's recognises that trans staff may require reasonable time to attend medical appointments related to their transition. In line with City's Terms and Conditions of Employment, this time, where granted by a line manager, will be considered special leave (additional to a staff member's contractual annual leave and sick leave) depending on need, on a case-by-case basis. For staff, in the first instance, request for special leave should be discussed between the individual and their line manager, and HR should be advised when special leave is agreed and taken.

In case of financial hardship, City St George's staff and students can apply for the City St George's Hardship Fund for [Staff](#) or [Students](#) to support them through transition.

Appendices 1 through 3, attached to this policy, can be used by transitioning colleagues and students to support them in their transition at City.

- [Appendix 1](#) is a checklist for transitioning staff to support them in ensuring that colleagues are informed, and systems altered to reflect their identity correctly.
- [Appendix 2](#) contains two sample letters for the purposes of informing others of transitional changes.
- [Appendix 3](#) is a glossary of terms.

### ***Changing personal details***

Changing personal details, such as names and titles can be a significant step for those transitioning. This process can take place informally or formally at City St George's. If a student or staff would like to be 'known as', this does not legally change what is on their records. This, however, may serve as a first useful step for the individual in living in their new identity.

### **Students**

If a student wishes to change their name, title, and/or relevant equalities data they can do so, either through the Student Centre or Academic Services. In order for a name to be changed formally, a Deed Poll, Gender Recognition Certificate or other legal document is needed. If students do not feel comfortable contacting a member of either team directly, then they may ask a staff member to action this on their behalf. The changes will be managed discreetly and in line with data protection policies. This process is also subject to change. If a student would like to be 'known as' another name then a formal request is not needed, this is a request that City St George's must meet where appropriate.

### **Staff**

If a colleague wishes to change their name, title and/or equalities data they can do so through Employee Self Service. A formal name change is not required to request a name to be used by colleagues and students, or on records across the Institution but is required for bank accounts, HMRC records, pension scheme, and qualification certificates. Colleagues may also ask their line manager to action this on their behalf. The changes will be managed discreetly and in line with data protection policies. This process is

also subject to change. If a staff member would like to be 'known as' another name, then a formal request is not needed, this is a request that must be made on demand where appropriate.

### **Support and resources**

Being trans, intersex or gender non-conforming is not a mental illness. Some trans, intersex, and gender non-conforming people may however require access to mental health support. City St George's is committed to ensuring TIGNC students and staff have access to its mental health support.

#### **Students**

City St George's recognises that it is important for students to have access to support regarding their mental health and emotional well-being. City St George's offers TIGNC students the opportunity to be referred to the [Student Health and Wellbeing team](#) or can self-refer via [Support@City](#). The Student Health and Wellbeing team offers confidential, psychological support to all current students who may be experiencing personal or academic difficulties. Student Health and Wellbeing also offers mental health advice and guidance to students registered with the Mental Health Team.

If a student is experiencing stress or anxiety due to, or exacerbated by, their biological sex or gender identity they can apply for [disabled students' allowances](#) (DSA) to access mentoring specifically to support them around their gender identity while studying at university.

#### **Staff**

City St George's offers staff who identify as trans, intersex or gender non-conforming the opportunity to access support and advice from the Employee Assistance Programme ([Vivup, City St George's Employee Assistance Provider](#)) and the Occupational Health Service (OHS). OHS advises on health at work and provides a range of services designed to prevent injury, promote wellbeing and advise on adjustments for staff. Vivup provide counselling and are an independent provider of professional employee support services. They employ professionally qualified counsellors and information specialists, who offer confidential and impartial advice and support.

## **9. Data Monitoring**

City St George's, University of London is committed to a policy of protecting the rights and privacy of individuals with regard to its processing of their personal data. The policy applies to all personal data processed by the institution. City St George's complies with the data protection legislation guided by the seven data protection principles.

Workforce and student equality monitoring supports the institution's Data Protection Policy is compliant with its obligations/duties under legislation. City St George's has an obligation to operate in line with Higher Education Statistics Agency's (HESA) and Office for Students policies, and as such, the collected data may be mandatory and subject to change.

City St George's also has a legal obligation to ensure that the data is collected, stored, and used in an appropriate, safe manner. When appropriate, data is anonymised to ensure individuals cannot be identified. Additionally, in specific circumstances, number suppression will be used to ensure that persons cannot be identified due to the number of individuals selecting specific categories being low.

Personal data for staff can be accessed and updated through the Employee Self-Service. Students complete equality monitoring forms through their UCAS application and when re-registering onto their course. Updating sensitive data when data requires updating by an individual within City St George's, this will be managed discreetly by those staff involved in this process.

Further information about equality monitoring regarding staff can be obtained from OIEI.

## 10. Document Control

Document Control Information		
<b>Owner</b>	The Office for Institutional Equity and Inclusion	
<b>Published</b>	[Month, Year] (TBC)	
<b>Does this replace another policy/procedure?</b>	No	
<b>Next scheduled review:</b>	Ongoing but next scheduled for January 2027	
<b>Last updated:</b>	<b>Brief description of amendment:</b>	<b>Date of next review:</b>
May 2025	Development of interim policy version to reflect legal and regulatory changes.	Ongoing
<b>Document Location</b>		
<ul style="list-style-type: none"> <li><a href="https://staffhub.city.ac.uk/human-resources/policies">https://staffhub.city.ac.uk/human-resources/policies</a></li> </ul>		

**Appendix 1: Check list for Staff**

Who needs to know?

Person responsible	Who will tell them?	When?	Date completed
HR Business Partner			
Senior Manager			
Line Manager (if not main point of contact)			
Others (please specify)			

Planning the future

<b>Your new name (in full, if known)</b>	
<b>Your role</b>	
<b>Name of line manager</b>	
<b>Medical advisor (name/contact details) if applicable</b>	

Telling colleagues/friends and people you work with/external partners

- Who will tell colleagues/partners?
- Will you be there?
- When will this take place?
- Where will this take place?
- What information will be provided?

Getting ready for your first day back

- When will this be?
- Change of role?
- Are you ready?
- Is your wardrobe/uniform ready?

Are colleagues ready?

- Additional support for you and/or loved ones?
- Any media concerns?
- You may wish to consider changing the details on the following records:
- Voicemail
- Business cards
- Work-based social media (Yammer)
- Union Membership
- Certificate and awards
- Medical appointments and absences (if applicable)

Details of meetings

Date	Comments	Actions	Date of next meeting

Please complete this template and return to HR (see Letter 2 below) in order for your records to be changed on the University systems.

Title (Ms/Miss/Mrs/Mr/Mx/Dr/Prof/Other):

Gender:

Previous first name:

Previous surname:

New first name:

New surname:

Preferred pronoun:

Record to be changed	Please tick	Date completed (for HR use)
Name badge		
Online records, e-portfolio/record of achievements, academic		
All staff records and databases, enrolment forms, finance records		
Payroll (and banking details)		
Welfare/disability/counselling records		
Website 'About Us' section		
Volunteering/mentoring records		
Telephone		
Intranet address entry		
Pensions scheme, death in service and dependents' benefits		
Insurance policies		

## **Appendix 2: Sample letters**

### *Letter 1: Telling City St George's about your transition*

Send this letter to your Line Manager

Date:

Dear (Manager),

I would like to notify City St George's, University of London that I am transitioning. I have read the City St George's policy for trans, intersex and gender non-conforming staff and I am advising you that I plan to change my name and legal gender marker (delete as appropriate) in the near future.

As required by the policy, I am giving you my explicit written consent to notify people, on a 'need-to-know' basis, so that support can be provided, and a Confidential Action Plan can be developed that will address matters relating to changes to institution records and disclosure to others.

I welcome the opportunity to discuss with you how my transition and the impact it may have for my work.

Please find attached the HR template that I have provided to HR.

Yours,

[Your name as it is currently held by the University]

*Letter 2: Giving explicit consent to share information and update City St George's records*

Please post this letter marked confidential to the HR Manager (Recruitment, Administration and Systems)

Date:

Dear [Named contact]

I would like to grant you permission to discuss my transition with other staff at City St George's, University London on a strictly 'need-to-know' basis, so that appropriate arrangements can be put in place to support me during my transition.

Please also accept this letter as my consent to make the necessary arrangements for City St George's documents, records and systems to be updated so that all references to me in my former name and gender marker are replaced with my new name and gender marker as stated below:

I would like these changes to be actioned by [date]. (Ideally this date should be at least 8 weeks away, but we will aim to accommodate your request earlier if we can and if this is acceptable to you).

I welcome the opportunity to discuss changing records so that we can agree priorities and a reasonable timescale.

Please find attached HR template.

Yours,

[Your name as it is currently held by the University]

## Appendix 3

### *Glossary of Terms*

We understand that terminology changes and can be individualised. It is important to be mindful of trends in language as a student or colleague may associate with a term perceived by some, even members of the same community, in a different way. The following may be helpful.

**Assigned sex at birth** – The action taken by a medical professional when a child is born, and they identify the biological sex of the baby generally anatomically.

**Biological sex** – Used to indicate physical and physiological differences between people.

**Cis/Cisgender** – When a person's self-identified gender identity aligns with the biological sex they were assigned at birth.

**Deadnaming** – Deliberately or accidentally using a person's pre-transition name.

**Gender** – Often expressed in terms of masculinity and femininity, gender is largely culturally determined and is assumed from the sex assigned at birth.

**Gender critical** – The belief that sex is a fact of biology that cannot be changed and doubting the idea of gender identity.

**Gender expression** – How someone manifests their gender identity in society, typically through their appearance, dress, and behaviour. Gender expression is not necessarily connected to their gender identity. Also known as gender performance or gender presentation

**Gender identity** – A person's innate sense of their own gender, whether male, female, trans, non-binary, gender non-conforming and agender people, amongst many other gender identities which may or may not correspond to the sex assigned at birth.

**Intersex** – A term used to describe a person who may have the biological attributes of both sexes or whose biological attributes do not fit with societal assumptions about what constitutes male or female. Intersex people may identify as male, female, or non-binary.

**Legal Transition** – Altering a person's legal gender (but not their biological sex) on a Birth Certificate or other identity document(s) to their self-identified gender. The legal rules around this vary from country to country.

**Misgendering** – Deliberately or accidentally using different pronouns or identifiers for a person than those that they have indicated for themselves.

**Medical or physical Transition** – Physical medical pathway that may include changes (puberty blockers, hormones and/or surgery) which may be used to alleviate gender dysphoria. Not all trans people will medically transition.

**Neo-Pronouns** – Pronouns that are not as commonly used as he/she/they, includes xe/xir etc.

**Social Transition** – the social changes that someone may choose as part of their transition; may include coming out, changing one's names and pronouns, using differently gendered facilities, changing one's gender performance and presentation. Does not include physical transition.

**Trans/Transgender** – An umbrella term to describe people whose gender is not the same as, or does not sit comfortably with, the biological sex as assigned at birth. Trans people may describe themselves using one or more of a wide variety of terms, including (but not limited to) transgender, transsexual, gender-queer (GQ), gender-fluid, non-binary, gender-variant, crossdresser, genderless, agender, nongender, third gender, bi-gender, trans man, trans woman, trans masculine, trans feminine and neutrois.

This glossary is not an exhaustive list of terms.

INTERIM