1. Purpose of the Trans, Intersex and Gender Non-Conforming People: Policy (‘the Policy’)

City, 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 actively promoted and in which any discrimination, harassment or victimisation based on a person’s gender identity and/or gender expression is not tolerated.

City 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’s values ‘We Care, We Learn, and We Act’ are reflected in our policies.

The purpose of the Policy is to specifically set out how City commits to supporting TIGNC students, colleagues and other stakeholders, and how they are protected from discrimination, harassment and victimisation.

Regarding staff, the Policy applies to (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 staff with queries, concerns or an interest in learning more please visit the EDI training webpages or contact edi@city.ac.uk.

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

For students with queries or concerns relating to the Policy and its implementation, or who have an interest in learning more, please contact edi@city.ac.uk.

2. Scope

The Policy along with additional guidance, demonstrates City, University of London's commitment to the inclusion of TIGNC people as staff members and students. The Policy applies to everyone who visits, works, or studies at the University, and more broadly, anyone who is affiliated with City, University of London. This includes staff, students, contractors, and visitors, regardless of race or ethnicity, sex, gender reassignment, disability, sexual orientation, age, religion or belief, pregnancy or maternity status, marriage and civil partnership status or socio-economic background.
The Policy has been developed and reviewed by the TIGNC Working Group comprising of TIGNC students, staff and the wider TIGNC community. City fully welcomes and includes TIGNC staff and students in all the activities and experiences offered to them at City.

City is also committed to promoting inclusive practices which include but are not limited to:

- beginning events, modules, meetings, etc., by people introducing themselves by name and pronouns;
- not making assumptions about anyone’s gender identity just by looking at them or seeing their name on documents;
- using gender-neutral language with/about people you do not know, and avoiding terms like ‘Sir’, ‘Madam’, ‘Ladies and Gentlemen’, etc. Gender neutral pronouns include ‘they/them/their’;
- using gender neutral terms to address groups might include ‘everyone’, ‘folks’, ‘students’, ‘staff’ or ‘colleagues’;
- 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, understanding that it is okay to ask;
- using gender inclusive language in its publications, internal and external communications, social media and website;
- when addressing instances of discrimination, exclusion or harassment, reflecting the needs of the members of the TIGNC community in decision-making and actions;
- 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 when providing references for academic or employment purposes;
- ensuring a zero-tolerance approach to transphobia including transmisogynny, whether this be coming from staff, contractors, students or visitors to City;
- designing and where necessary adapting City estate in such a manner as to provide to the needs of TIGNC people, for example when it comes to all-gender toilets and changing rooms, and clear and appropriate signage to these facilities.

3. Equality, Diversity and Inclusion Statement

City, 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.

4. Legal context

There are four pieces of legislation that are relevant to trans, intersex and gender non-conforming people in a Higher Education setting.
**Equality Act 2010** – The protected characteristic in the Equality Act 2010 that relates to trans and gender non-conforming people is called ‘gender reassignment’. Individuals are protected from discrimination and harassment on the grounds that they:
- intend to undergo gender reassignment;
- are undergoing gender reassignment;
- have at some time in the past undergone gender reassignment.

The Gender Reassignment section of the Equality Act 2010 uses the term ‘transsexual’ and refers to this group of people within the legislation. It does not refer to intersex people within the legislation.

It should be noted that gender-critical beliefs qualify for protection under the Equality Act 2010. This must be held in balance with the dignity and respect of trans people and City’s values.

**Gender Recognition Act 2004** – The Gender Recognition Act 2004 (GRA) enables a person to change their legally recognised gender, provided it is male or female. This legislation refers to binary transgender people who are wishing to alter their legal sex. It does not relate to intersex people, or gender non-conforming people.

**Data Protection Act 2018** – Personal data must be looked after properly following the eight data protection principles, which include ensuring personal data is accurate, secure and processed fairly and lawfully. Information about a person’s gender identity, gender history or sex characteristics is considered to be confidential. Many staff will have access to the student data management system and therefore may be able to view information regarding gender identity, however all staff are trained and bound by data protection laws.

**Human Rights Act 1998** – The Human Rights Act 1998 brings the rights contained in the European Convention on Human Rights into the UK. The rights relevant to TIGNC people include, but are not limited to, Art. 8, Art. 10 and Art. 14. Moreover, the courts, the government, lawmakers and public institutions such as universities, must act in accordance with the Convention rights as well as the caselaw of the European Court of Human Rights.

**Recent Case Law** – Some court cases have impacted the way that the above laws are applied. For example, due to the Taylor vs Jaguar Land Rover case of September 2020, non-binary people are now protected underneath the Equality Act 2010 under gender reassignment protected characteristic.

5. **Definitions**

The Policy and the guidance will use several terms with which you may not be familiar with. Key terms used, which are based on the [List of LGBTQ+ terms](https://www.stonewall.org.uk/terms), throughout this policy include:
Trans – An umbrella term to describe people whose gender is not the same as, or does not sit comfortably with, the sex they were 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 largely culturally determined and is assumed from the sex assigned at birth.

Please note that all other terminology related to this policy are explained in Appendix 1 of the Policy.

6. Key Policy Principles

City 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 aims to:
- place the trans, intersex and/or gender non-conforming person at the heart of decision-making and actions that affect them;
- ensure compliance with the right to privacy and confidentiality for TIGNC people;
- encourage gender-neutral language across City communications and gender diversity throughout all of City’s data collection;
- create a supportive, respectful, and nurturing environment for all TIGNC people within the City community.

Responsibilities of staff, students, and contractors are to:
- treat people in accordance with their self-identified gender;
- allow for the provision of and access to facilities (including toilets) in accordance with self-identified gender and on the basis of appropriate and mutually respectful use by all users;
- use appropriate gender markers where they are allocated, and respect the use of people’s chosen names, title and pronouns that have been requested without harassment;
- avoid assuming a person’s gender identity;
- respect and accommodate for the mental and physical healthcare needs of trans staff, contractors, and students.
The University will take seriously any instances of non-adherence to equality legislation and the Policy by its staff, students, visitors, or any other member of its community. Any instance of breach of the Policy may be considered as gross-misconduct and where appropriate will be considered under the respective disciplinary codes for staff and students. With regard to any breach of the policy by visitors, the University will take appropriate action in relation to the nature of the incident.

7. Governance Requirements

The President, supported by the University’s Senior Leadership Team, is responsible for ensuring the 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:

- eliminate discrimination, harassment and victimisation;
- advance equality of opportunity; and
- foster 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 (i.e., the TIGNC Working Group), is responsible for developing policies and best practice in order to support meeting these legal requirements.

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. Further to this, all new staff are invited to attend the EDI Essentials eLearning module and Trans Awareness: The Basics (online) training module along with other EDI-related training to enhance their knowledge and expertise on equality, diversity and inclusion matters.

Any issues that are linked to this policy statement are reported to the University’s EDI Board and Senior Leadership Team.

If you have any queries about this document or have a confidential enquiry, please contact the OIEI team at edi@city.ac.uk.

The 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; and
- City Students’ Union.

7.1 Review and update
In consultation with the TIGNC Working Group and other relevant stakeholders, a full review will be carried out every three years with allowance for minor annual updates of roles and responsibilities, as required.

Interim, minor changes, such as change of a role title or other titles or name which do not change the meaning of the Policy will be dealt with by the operational owner.

Major changes that alter the meaning of the Policy or are substantial amendments will be submitted via the full approval route.

8. Bullying and Harassment

City commits to treating all staff, students, and other stakeholders with respect at all times. City will treat any complaint of harassment or bullying linked to transphobia seriously and thoroughly investigate in line with City’s complaints procedures. In cases where bullying/harassment by a member of City staff or student are alleged to have taken place, City will commence the relevant disciplinary process. Deliberate and/or consistent deadnaming and/or misgendering is a form of harassment.

City has the following policies, procedures, and guidelines in place for situations where harassment and bullying have taken place or where allegations are made.

Students

In terms of the student policies, 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.

- Student Charter
- Student Support
- Students’ Union Advice Team

Students who feel they are being discriminated against by a member of City staff or student on grounds of their gender identity or gender expression should raise the matter under Student Harassment and Bullying Policy If the complaint is substantiated, City’s Student Disciplinary Regulations or Staff Disciplinary Procedure may be invoked.

For EDI-related reports (anonymous and identifiable), we encourage students to use the University’s You Report We Support system.

Staff
City staff who feel they are being discriminated by a fellow member of City 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 City’s Bullying & Harassment 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 policies and procedures.

Bullying & Harassment Advisors can be contacted directly via, phone, email, or web request form.

- **Grievance Procedure**
- **Staff Harassment and Dignity at Work Guidelines**
- further information is available via the [Bullying and Harassment](#) page
- City’s Staff Hub
- **Disciplinary Procedure**

### 9. How the Policy is supported

Demonstrating best practices is essential for both staff and students at City, University of London. The two additional pieces of guidance documents outline these best practices:

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

The supporting documents cover a variety of areas including but not limited to; transitioning at the University, changing personal details, DBS Checks, and where to find help. The documents are in place to support the TIGNC community and to establish what they can expect from the University.

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

#### Student policies

- **Student Harassment and Bullying Policy**
- **Student Charter**
- **Student Complaints Policy**
- **Student Sexual Misconduct Policy**
- **Student Disciplinary Policy**

#### Staff Policies

- **Staff Harassment and Dignity at Work Guidelines**
- **Staff Grievance Procedure**
10. Data Monitoring

City, University of London is committed to 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 City. City complies with the data protection legislation guided by the six data protection principles.

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

City 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. The updating of sensitive data required by an individual within City will be managed discreetly all staff involved in this process. Further information about equality monitoring regarding staff can be found in the workforce equality monitoring report.
11. Document Control

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<td><strong>Published</strong></td>
<td>June, 2024</td>
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**Document Location**

[https://staffhub.city.ac.uk/human-resources/policies](https://staffhub.city.ac.uk/human-resources/policies)
Appendix 1

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 sex of the baby via the genitals of the baby.

**Biological Sex** – Can be used to indicate biological differences between people.

**Cis/Cisgender** - When a person’s self-identified gender identity aligns with the 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 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, they include 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 sex they were 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. For a further list of key terms, please refer to the following list of pre-existing glossaries this glossary has adopted terms from:

- [Glossary - Mermaids (mermaidsuk.org.uk)](http://mermaidsuk.org.uk)
- [Gendered Intelligence Description of Terms](http://genderedintelligence.uk)
- [Gender Identity (T+) - The Proud Trust](http://theproudtrust.org)
- [List of LGBTQ+ terms (stonewall.org.uk)](http://stonewall.org.uk)
- [Our Glossary | Resources (thekitetrust.org.uk)](http://thekitetrust.org.uk)
1. Purpose and scope
2. How the procedure is supported
3. Roles and Responsibilities
4. Recruitment
5. Transition
6. Support through transition
7. Management Action in relation to Transition
8. Developing an agreement or an action plan in relation to transition
9. Communication with colleagues
10. Names/ pronouns/ title
11. Official Records and Photographs, documents and monitoring
12. Toilet and changing rooms
13. DBS checks
14. Leave
15. LGBTQI+ Staff Network
16. Pensions
17. Where to find help and advice
18. Definitions/Glossary of terms
19. Document Control
20. Appendix 1
21. Appendix 2
1. Purpose and Scope

This procedure is aimed at members of staff who are line managers or members of staff or HR, who are supporting trans, intersex, and gender non-conforming staff. It will also be useful for TIGNC staff members to read this guidance to understand what to expect from City and how City supports members of staff.

People work better if they can be themselves at work. When staff work together to create a respectful and nurturing environment for trans, intersex, and gender non-conforming people this improves the working environment for everybody. Some TIGNC people choose not to share their identity in the workplace because they fear a negative reaction from their managers, co-workers, and students. As a result, such staff may be under considerable stress. This may lead to people needing time off work to take care of their mental health and more generally not feeling able to work to their full ability.

It is important that trans, intersex or gender non-conforming staff are made to feel included and supported at City. Staff should make it clear that they will do all they can to make them feel comfortable and included at City.

If a staff member decides to undergo medical procedures or interventions related to their gender identity, City will ensure a reasonable amount of paid time off work for appointments to do with the transition process. This will be treated differently to time off for sickness absence and must be discussed and agreed in advance with the line manager. Support for returning to work after surgery should also be discussed with line managers and could include a phased return to work.

In case of financial hardship, City staff and students can apply for the City Hardship Fund for Staff or Students to support them through transition.

City 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 City 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.

2. How the procedure is supported

In addition to the Trans, Intersex and Gender Non-Conforming People Policy and Procedure documents there are a number of policies and initiatives that aim to support TIGNC staff. This Policy should be read alongside the following policies, procedures, guidelines and local protocols:
3. Roles and Responsibilities

3.1. Managers will:

- familiarise themselves with this procedure, and the related Trans, Intersex and Gender Non-Conforming People Policy.
- ensure a risk assessment has been carried out and is regularly reviewed for TIGNC staff.
- discuss and agree with the member of staff arrangements for supporting their transition.
- consider any requests for flexible working to support the member of staff.

3.2. Members of staff will:

- familiarise themselves with this procedure, and the related Trans, Intersex and Gender Non-Conforming People Policy.
- provide the appropriate notifications and documentation to enable transition support to be delivered.
- maintain reasonable contact with their manager during their Transition Leave period.

3.3. Human Resources will:

- process leave arrangements, and provide written confirmation of entitlements to members of staff;
- provide guidance to line managers when considering requests for flexible working received following periods of leave.

3.4. Office for Institutional Equity and Inclusion will:

- provide guidance to members of staff and line managers on the application of the Trans, Intersex and Gender Non-Conforming People Procedure, and the related Policy;
- provide opportunities for relevant equality, diversity and inclusion staff training, specifically focusing on Trans awareness.

3.5. Staff, students and contractors will:

- treat people in accordance with their self-identified gender.
- allow for the provision of and access to facilities (including toilets) in accordance with self-identified gender and on the basis of appropriate and mutually respectful use by all users.
• use appropriate gender markers where they are allocated, and respect the use of people’s chosen names, title and pronouns that have been requested without harassment.
• avoid assuming a person’s gender identity.
• respect and accommodate for the mental and physical healthcare needs of trans staff, contractors, and students.

4. Recruitment

City understands that potential members of staff who feel that they can be open about their trans, intersex or gender non-conforming status or history without fear of discrimination will result in performing better at application stage, at interview and in their job.

To support inclusive recruitment practises, City ensure that all advertised roles include an equality, diversity, and inclusion statement, use non-discriminatory language and that panel members are offered recruitment and EDI training.

Successful individuals are given a starter monitoring form that asks for information about gender identity and history.

An applicant will not be questioned about their sex or gender identity during their interview.

At City, steps are taken to ensure that a person is not ‘outed’, for example, by checking the names used in references before passing them to the person responsible for recruitment and ensuring that documentation showing a person’s sex or gender identity or history is viewed on a strictly need-to-know basis.

If City chooses to use the positive action measures within the Equality Act 2010, in the event that two candidates are of equal merit, human resources can be deferred to for advice as to whether either candidate is:
• from a protected group and
• that group is underrepresented in the workforce, or suffers a disadvantage connected to that protected characteristic.

A newly recruited member of staff can contact the HMRC to request that tax and pay information (e.g., P60 and P45 forms) reflects their current name and gender identity. More information can be requested by contacting hradmin@city.ac.uk.

5. Transition
Some trans, intersex and gender non-conforming people might choose to transition, and those that do will navigate individual paths, selecting the elements that they need and want from the options available. There is no one way to transition.

Social transition means changing a person’s gender expression using cultural cues and signifiers such as name, pronoun (he, she, they etc), title (Mr. Ms. Mx. Etc.), clothing, hair, walk, speech, mannerisms and any other gendered aspects of presentation and documentation.

Medical transition means having medical intervention such as hormone therapy or surgery. Social transition is a pre-requisite for access (through the NHS) to some medical interventions.

Legal transition typically means obtaining a Gender Recognition Certificate. Staff and students from outside England & Wales may transition according to the frameworks that exist in other countries.

Those wishing to transition should receive sufficient support from key members of staff. This may include particular staff members being with them to support them if or when they choose to tell their team, other colleagues, or students of their transition.

6. Support through transition

The Transgender, Intersex and Gender Non-Conforming Policy aims to ensure that appropriate support is received before, during and after transition as well as if the notion of ‘transition’ does not apply.

Members of staff can initially inform their line manager of their intentions to transition in the way that they feel most comfortable. This could be a letter or email followed by a meeting with the line manager. Attached to this policy is Appendix 2 which can be used by transitioning colleagues and students to support them in their transition. Appendix 2 contains two sample letters for the purposes of informing others of transitional changes.

7. Management action in relation to transition

It can be a difficult step for someone to approach their manager and ‘come out’ as trans, intersex or gender non-conforming. It may also be challenging to tell their manager that they are planning to transition, socially or medically. It is therefore important for managers to deal with conversations and exchanges sensitively.

Managers should:

- let the process be led by the individual
- listen and show support
• adopt an approach that meets the needs of the employee
• discuss levels of confidentiality
• agree to seek advice from the HR team and/or the Office for Institutional Equity & Inclusion
• agree to work together
• draw the attention of the member of staff to the policy as well as other useful facilities provided by City (including support around well-being if desired)

8. Developing an agreement or an action plan in relation to transition

Individuals could have a range of experiences or objectives around their transition. Some people prefer as few people as possible to know about their transition and decide to discuss this with their manager but require no further action. Some may be planning for medical intervention so there may be particular things to plan for, such as leave.

It is important to agree with the member of staff what steps need to be taken. Some people refer to this as developing an agreement or an action plan. See Appendix 1 for a suggested template.

It may be necessary to identify when key changes will take place and how they fit with any relevant work deadlines. For example, communicating to colleagues and students, name changes on systems, the commencement point for using facilities appropriate to their self-identified gender, planning leave for medical intervention if taken. It may be important to agree how best to communicate during any period of absence.

As part of this planning, a series of review meetings should be scheduled at an agreed frequency in order to maintain good communication. Any changes in plans can be updated and developed. There should be an agreement about where the plan or any meeting notes are kept and who has access.

Throughout the process a trusting and open relationship between the transitioning employee and the manager and HR is really important. This should involve joint problem-solving (such as anticipating and planning for any problems), confidentiality, reliability (staff doing what they say they are going to do) and empathy (providing support).

Transitioning to a new gender is likely to involve on-going processes of social adaptation. Some people require emotional support over many years, both before and after transition. Managers will continue to offer support.
Support through a person’s transition should end through mutual agreement between the individual and their manager.

9. Communication with colleagues

It may be that the person transitioning will want to communicate with colleagues about their transition. Managers should encourage the individual to describe what they think will be best for them when it comes to sharing relevant information. This could be a verbal communication at team meetings or on a 1:1 basis. The person who is transitioning could be present or absent. It could be an electronic communication.

This communication will need to be practical and address important issues such as how to address the colleague (new name, correct pronoun), how to support the colleague, how to deal with questions that may come from outside the team without breaching confidentiality etc. Managers must set a tone of absolute inclusion and respect.

Whilst the person transitioning may need to provide information about their requirements, it may be an opportunity for the manager or HR to identify any need for awareness raising training for colleagues/peers. It is not the job of the employee who is transitioning to educate their co-workers. Staff can access training opportunities offered by the Office for Institutional Equity & Inclusion.

10. Names/ pronouns/ title

If someone makes it clear how they would like to be addressed (in terms of their name, pronoun and title), then it is very important to respect that mode of address. If a colleague wishes to change their name, title and/or equalities data they can do so through SAP NetWeaver Employee Self Service by selecting ‘Update personal data’

Staff can request a name change at any point. A formal name change is not required in order 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.

If a person chooses to change their name formally, there are two ways in which they can do this - by deed poll or by statutory declaration of name change. City accepts either of these methods. A deed poll or a statutory declaration of name change can be
created by the person themselves and must be witnessed. For more information see: https://www.gov.uk/change-name-deed-poll/overview. For more on changing names see section: Official Records and Photographs, documents and monitoring.

No one should assume what pronouns a person will use. It is best to take each person’s lead regarding the names, pronouns, and title that they use for themselves.

Along with the pronouns ‘he’ and ‘she’, some people use ‘they’ as this is a gender-neutral pronoun. This is often asked for by non-binary or some other gender non-conforming people. There are other pronouns used such as Ze/Hir and Xe/Xir. These pronouns are often called neo-pronouns and are often used as neutral pronouns.

If someone does not make it clear what pronoun they use it is okay to ask. Staff could say: ‘which pronoun would you like me to use?’ Staff should not simply assume someone’s pronoun based on their assessment of their outward appearance.

It is important to refer to a person using their chosen pronouns whether or not the person is present. For example, if a manager is discussing something with a HR team member, they should refer to the person with the pronouns that they have requested. If a mistake with pronouns is made, whether the person is present or not, acknowledge the error, apologise genuinely, and move on.

Intentionally not using a person’s name or pronoun that they have explicitly asked for can constitute harassment and is a violation of this policy. Accountability procedures are covered in the Harassment and Bullying Policy.

Along with titles such as Mr. and Ms, people may request gender-neutral titles such as Mx, (pronounced ‘Mix’). It is good practice to ensure systems allow for gender-neutral titles as well as for no title. ‘Mx’ is used by the DVLA and UK Deed Poll Service, as well as banks, some councils and other businesses.

11. Official Records and photographs, documents and monitoring

Some people choose not to change their name formally straight away, have no intention of changing their name or are unable to for other reasons. When an employee notifies City in writing of their intention to transition during their employment, the date from which their name and gender marker is changed on all records should be agreed with the individual. The person’s file should reflect their current name, title and gender marker.

In order for a person to change their name on their bank account, HMRC records, pension scheme, and their qualification certificates, they will need to carry out a formal name change through either a statutory declaration of name change or by deed poll.

Under the Gender Recognition Act, a person has the right to request that all references to their former name and gender are removed and replaced with their current name and gender.

Disclosure of a person’s trans, intersex or gender non-conforming status without a person’s consent will be a violation of their privacy.
Any material that needs to be kept related to the person’s trans, intersex or gender non-conforming status, such as records of absence for medical reasons, should be stored confidentially. No records should be changed without the written permission of the staff member.

Photographs should represent an accurate likeness of the member of staff’s current appearance and so should be updated if this changes. The City card service allows trans, intersex and/or gender non-conforming staff to be issued a new card with updated details and photo free of charge. It should also be noted that some individuals may wish to change their photos without stating anything about their sex or gender identity; this is commonly done under the premise that the photo does not represent an accurate likeness of them.

The employee should complete form HR1 (see Appendix 1) and return it to the HR department who will arrange for the necessary information on their records to be changed.

In circumstances where City requires official confirmation of a person’s identity, they will be given the option of providing more than one type of official identification such as driving licence, passport, statutory declaration or birth certificate.

12. Toilet and changing rooms

Trans people are entitled to access any facilities (including toilets) in accordance with self-identified gender and on the basis of appropriate and mutually respectful use by all users.

There are all-gender toilets in some University buildings and their location can be found via CityNav, which can be downloaded through the Student Hub.

13. DBS checks

The Disclosure and Barring Service is responsible for checking criminal records in England. The DBS has processes in place for people have had previous gender identities. This includes those with a full GRC who do not wish to disclose their former identity to their employer or placement provider.

Employers and placement providers will provide a DBS form that is to be completed by the person whose criminal record is being checked. Before an application is submitted by an employer or placement provider, the applicant will need to contact the DBS sensitivities team: sensitive@dbs.gsi.gov.uk who will guide them through the process, track the application and maintain confidentiality. The applicant does not need to disclose their gender history to their employer.
14. Leave

City 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 City 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.

15. LGBTQI+ Staff Network

City has an LGBTQI+ Network to raise the visibility of the LGBTQI+ community. The group meets regularly on matters to promote inclusivity and greater understanding and awareness of diversity at City. The group holds events during the year that promote greater awareness of who we are as a community. Information about City’s LGBTQI+ Staff Network can be found at: LGBTQI+ Network | City, University of London (login required).

16. Pensions

HMRC is informed if a full Gender Recognition Certificate is issued, either by the Gender Recognition Panel or by the trans person themselves. This will lead to a change in national insurance records to reflect the person’s self-identified gender.

City will agree with the individual the date of change of name, title and, if applicable, gender for pension purposes.

The HMRC will use a person’s preferred name and title in all communications.

Occupational pension schemes are now required to have the same retirement age and benefits for men and women.

Private pension firms will require legal evidence of gender as well as name change, and staff should be asked to provide a new birth certificate and, if appropriate, a statutory declaration of name change.
17. Where to find help

Being trans, intersex or gender non-conforming is not a mental illness. However, in part due to experiences of harassment, discrimination, abuse in wider society, some trans, intersex, and gender non-conforming people may require access to mental health support.

City is committed to ensuring TIGNC students and staff have access to its mental health support.

City offers staff who identify as trans, intersex or gender non-conforming the opportunity to access support and advice from the Employee Assistance Programme (Care First) 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.

Care First provide counselling as part of the Employee Assistance Programme (EAP) and is an independent, leading provider of professional employee support services. Care First employ professionally qualified counsellors and information specialists, who offer confidential and impartial advice and support.

Staff with any queries about this document or have a confidential enquiry, please contact The University’s Office for Institutional Equity and Inclusion (OIEI) at edi@city.ac.uk. The OIEI wishes to not only 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.

For staff interested in learning more please visit the EDI training webpages or email edi@city.ac.uk.

For EDI-related reports (anonymous and identifiable), we encourage the use of the University’s You Report We Support system.

For further help, Staff can also refer to the following University procedures, polices and initiatives:

- Staff Grievance Procedure
- Harassment and Bullying of a member of staff by students is not to tolerated and should be dealt with via the student bullying and harassment policy
- Staff Disciplinary Procedure

Further help and advice is also available from the relevant HR Adviser.

18. Definition/Glossary of Terms

For a glossary of terms, please refer to the TIGNC People Policy.

19. Document Control
<table>
<thead>
<tr>
<th>Document Control Information</th>
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<tbody>
<tr>
<td><strong>Owner</strong></td>
</tr>
<tr>
<td><strong>Published</strong></td>
</tr>
<tr>
<td><strong>Does this replace another policy/procedure?:</strong></td>
</tr>
<tr>
<td><strong>Next scheduled review:</strong></td>
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<table>
<thead>
<tr>
<th>Last updated:</th>
<th>Brief description of amendment:</th>
<th>Date of next review:</th>
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**Document Location**
- [https://staffhub.city.ac.uk/human-resources/policies](https://staffhub.city.ac.uk/human-resources/policies)
Check list/ Questions and points to consider around managing a person’s transition

For Staff
Who needs to know?

<table>
<thead>
<tr>
<th>Person responsible</th>
<th>Who will tell them?</th>
<th>When?</th>
<th>Date completed</th>
</tr>
</thead>
<tbody>
<tr>
<td>HR Manager</td>
<td></td>
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<tr>
<td>Senior Manager</td>
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<tr>
<td>Line Manager (if not main point of contact)</td>
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<tr>
<td>Others (please specify)</td>
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Planning the future

<table>
<thead>
<tr>
<th>Your new name (in full, if known)</th>
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<tbody>
<tr>
<td>Your role</td>
<td></td>
</tr>
<tr>
<td>Name of line manager</td>
<td></td>
</tr>
</tbody>
</table>

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?
Other considerations
- Additional support for you?
- Any media concerns?
- You may wish to consider changing the details on the following records:
  - Voicemail
  - Work-based social media (Viva Engage)
  - Union Membership
  - Certificate and awards
  - Medical appointments and absences (if applicable)
  - Email signature

<table>
<thead>
<tr>
<th>Reason</th>
<th>Dates</th>
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Details of meetings

<table>
<thead>
<tr>
<th>Date</th>
<th>Comments</th>
<th>Actions</th>
<th>Date of next meeting</th>
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Please complete this form and return to HR in order for your records to be changed on the University systems.

**FORM HR1**
Title: Ms Miss Mrs Mr Mx: ……… Gender: Previous first name: 
Previous surname: ……………………………………………..

New first name: …………………………………………………….
New surname: ………………………………………………………
Pronoun: ……………………………………………………….

<table>
<thead>
<tr>
<th>Record to be changed</th>
<th>Please tick</th>
<th>Date completed (for HR use)</th>
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<tbody>
<tr>
<td>Name badge</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Online records, e-portfolio/record of achievements, academic</td>
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<td></td>
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<tr>
<td>All staff records and databases, enrolment forms, finance records</td>
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<tr>
<td>Payroll (and banking details)</td>
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<tr>
<td>Welfare/disability/counselling records</td>
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<td>Website ‘About Us’ section</td>
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<td></td>
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<tr>
<td>Volunteering/mentoring records</td>
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<td>Telephone</td>
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<tr>
<td>Intranet address entry</td>
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<tr>
<td>Pensions scheme, death in service and dependents’ benefits</td>
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<tr>
<td>Insurance policies</td>
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Sample letters
Letter 1: Telling City about your transition

Send this letter to your Line Manager

Date: xx/xx/xxxx

Dear (Manager),

I am writing to notify City, University of London that I am transitioning. I have read the City Trans, Intersex and Gender Non-Conforming People: Policy 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 hereby give 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 form HR1

Yours sincerely

[Your name as it is currently held by the University]
Date: xx/xx/xxxx

Dear [Named contact]

I am writing to grant you permission to discuss my transition with other staff at City, 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 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 form HR1 Yours sincerely
[Your name]
PROCEDURE FOR SUPPORTING TRANSGENDER, INTERSEX AND GENDER NON-CONFORMING STUDENTS

1. **Purpose and scope**

2. **How the procedure is supported**

3. **Roles and Responsibilities**

4. **Admissions**

5. **Funding to support trans, intersex and gender non-conforming learners**

6. **Transition**

7. **Support through transition**

8. **Developing an agreement or an action plan in relation to transition**

9. **Communication with students and staff**

10. **Names/ Pronouns/ title**

11. **Official Records and Photographs, documents and monitoring**

12. **International Students**

13. **Toilet and changing rooms**

14. **DBS checks**

15. **Leave**

16. **Qualification certificates**

17. **Disabled students’ allowances**

18. **Support groups**

19. **Halls of residence and accommodation**

20. **Sport**

21. **Overseas trips**

22. **Field trips**

23. **Considerations for employment and placements**

24. **Where to find help and advice**
1. Purpose and scope

This document, along with our Transgender, Intersex and Gender Non-Conforming Policy, details and demonstrates City’s commitment to the inclusion of trans, intersex and gender non-conforming (TIGNC) people as students. This procedure is in place to support TIGNC students and to establish what they can expect from the institution. This guidance should also be utilised by members of staff who are working with and directly supporting trans, intersex and gender non-conforming students.

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 supports staff and students who are transitioning.

When a student decides to transition, they should register for a first contact conversation with the Student Health and Wellbeing or contact the Office for Institutional Equity and Inclusion as a first step. Information on the range and type of support available will be provided along with the practical steps that need to be taken. 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**.

People excel more if they can be themselves in their learning environments. When all staff and students work together to create a respectful and nurturing environment for trans, intersex and gender non-conforming people this improves the learning environment for everybody. Some trans, intersex and gender non-conforming people may choose not to share their identity at university because they fear a negative reaction from their tutors, fellow students and other individuals at university. As a result, many such students may be under considerable stress. This may lead to people needing time off from their studies to take care of their mental health and more generally not feeling able to study to their full ability.

If someone tells a person they are trans, intersex or gender non-conforming it is important that students make sure they feel included and supported at City. Making it clear that they will do all they can to make them feel comfortable and included at City.
2. How the procedure is supported

In addition to the Trans, Intersex and Gender Non-Conforming People Policy and Procedure documents there are a number of policies and initiatives that aim to support TIGNC students. These include:

- Equality, Diversity and Inclusion Policy
- Student Harassment and Bullying Policy
- Freedom of Speech Code of Practice

3. Roles and Responsibilities

a. Students will……

- familiarise themselves with this procedure, and the related Trans, Intersex and Gender Non-Conforming People Policy;
- provide the appropriate notifications and documentation to enable students’ arrangements to be processed;

b. Student Support will…:

- provide guidance to students on the application of the Trans, Intersex and Gender Non-Conforming People Procedure and the related Policy;
- process arrangements, and provide written confirmation of entitlements to students;
- provide guidance to students when considering requests for extenuating circumstances received.

c. Staff, students and contractors will…:

- treat people in accordance with their self-identified gender.
- allow for the provision of and access to facilities (including toilets) in accordance with self-identified gender and on the basis of appropriate and mutually respectful use by all users.
- use appropriate gender markers where they are allocated, and respect the use of people’s chosen names, title and pronouns that have been requested without harassment.
- avoid assuming a person’s gender identity.
- respect and accommodate for the mental and physical healthcare needs of trans staff, contractors, and students.

4. Admissions
City understands that potential students who feel that they can be open about their trans, intersex or gender non-conforming status or history without fear of discrimination will result in performing better at application stage, at interview and throughout their student life.

Initial data flows on equalities monitoring are controlled by UCAS and not the University. City encourages disclosures of an applicant’s gender identity or history during application processes with the purpose of ensuring they receive any support they may require, particularly with regards to documentation and references. Applicants are provided with an option ‘prefer not to say’, which when selected could (but not conclusively) indicate that the applicant is trans, intersex and/or gender non-conforming.

At City, steps are taken to ensure that a person is not ‘outed’, for example, by checking the names used in references before passing them to departmental teams and ensuring that documentation showing a person’s legal sex/gender is viewed on a strictly need-to-know basis.

Students who are offered places on a course at City are required to present photo identity documents on first registration. Students can choose from a selection of documents. Any copies made are kept in line with Data Protection guidelines. For more on identity documents see sections: Names/ Pronouns/ title and Official Records and Photographs, documents and monitoring.

References for current or former students must make no reference to the person’s trans, intersex or gender non-conforming status. References will always use the appropriate pronoun and should not refer to a person’s former names, or out them as trans, intersex or gender non-conforming.

An applicant will not be questioned about their sex or gender identity or history during their interview.

5. Funding to support trans, intersex and gender non-conforming learners

City is committed to ensuring all our students are supported throughout their student experience to succeed and progress in the way that is most meaningful for them. Alongside the benefits and support available to students, City will provide resources to best help students’ specific circumstances.

In case of financial hardship, students can apply for the City Hardship Fund to support them through transition.

6. Transition

Some trans, intersex and gender non-conforming people might choose to transition, and those that do will navigate individual paths, selecting the elements that they need and want from the options available. There is no one way to transition. Social transition means changing gender expression using cultural cues and signifiers such as name, pronoun (he, she, they etc.), title (Mr. Ms. Mx. etc.), clothing, hair, walk, speech, mannerisms and any other gendered aspects of presentation and documentation.
Medical transition means having medical intervention such as hormone therapy or surgery. Social transition is a pre-requisite for access (through the NHS) to some medical interventions.

Legal transition typically means obtaining a Gender Recognition Certificate.

Those wishing to transition should receive sufficient support from key members of staff. This may include particular staff members being with them to support them if or when they choose to tell their team, other colleagues, or students of their transition.

7. Support through transition

The Transgender, Intersex and Gender Non-Conforming Policy and Guidance aim to ensure that appropriate support is received before, during and after transition as well as if the notion of 'transition' does not apply.

Students can initially inform a member of staff at City of their intentions to transition in the way that they feel most comfortable. This could be a letter or email followed by a meeting with the staff member. However, for formal procedures to commence the request should be put in writing, should the person transitioning wish to ensure that actions will be taken in accordance with the request (including appropriate timeliness). A key staff member is best placed to offer the student the support needed on an ongoing basis.

8. Developing an agreement or an action plan in relation to transition

Individuals could have a range of experiences or objectives around their transition. Some people prefer as few people as possible to know about their transition and decide to discuss this with a staff member but require no further action. Some may be planning for medical intervention so there may be particular things to plan for, such as suspension of studies.

It is important to agree with the student what steps need to be taken. Some people refer to this as developing an agreement or an action plan.

It may be necessary to identify when key changes will take place and how they fit with any relevant submission deadlines. For example, communicating to other staff and students, name changes on systems, the commencement point for using facilities appropriate to their self-identified gender, planning leave for medical intervention if taken. It may be important to agree how best to communicate during any period of absence.

As part of this planning, a series of review meetings should be scheduled at an agreed frequency in order to maintain good communication. Any changes in plans can be updated and developed. There should be an agreement about where the plan or any
meeting notes are kept and who has access.

Throughout the process a trusting and open relationship between the transitioning student and the member of staff is really important. This should involve joint problem-solving (such as anticipating and planning for any problems), confidentiality, reliability (doing what they say they are going to do) and empathy (providing support).

Transitioning to a new gender is likely to involve on-going processes of social adaptation. Some people require emotional support over many years, both before and after transition. Staff should continue to offer support for the duration of their student life at City.

Support through a person’s transition should end through mutual agreement between the individual and the staff.

9. Communication with students and staff

It may be that the person transitioning will want to communicate with other students and staff members about their transition. The named contact should encourage the individual to describe what they think will be best for them when it comes to sharing relevant information. This could be a verbal communication during learning activities of which the person who is transitioning could be present or absent. It could also be more informally through social interactions or on a 1:1 basis. It could be an electronic communication.

This communication will need to be practical and address important issues such as how to address the student (new name, correct pronoun), how to support them, how to deal with questions that may come from the student cohort and the wider City community without breaching confidentiality etc. Staff must set a tone of inclusion and respect. Staff should also ensure that students are aware of the support available through the Student Health and Wellbeing teams.

Whilst the person transitioning may need to provide information about their requirements, it may be an opportunity for the key staff member to identify any need for awareness raising training for colleagues and also fellow students. It is not the job of the student who is transitioning to educate the staff or student body. Staff can access training opportunities offered by the Office for Institutional Equity & Inclusion.

10. Names/ Pronouns/ title

If someone makes it clear how they would like to be addressed (in terms of their name, pronoun and title), then it is very important to respect those preferences. Using a trans, intersex or gender non-conforming person’s new name and pronoun is one of the most
positive, validating things a person can do.

Students can request a name change at any point. A formal name change is not required in order to request a name to be used by colleagues and students, or on records across the Institution. Students should approach their course office to do this. A formal name change is required for the purposes of receiving qualification certificates in the students’ new name.

If a person chooses to change their name formally, there are two ways in which they can do this - by deed poll or by statutory declaration of name change. City accepts either of these methods. A deed poll or a statutory declaration of name change can be created by the person themselves and must be witnessed. Some institutions require the deed poll to be registered. This can be done for a small fee. Students can find out more: https://www.gov.uk/change-name-deed-poll/overview. For more on changing names see section: Official Records and Photographs, documents and monitoring.

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 must meet where appropriate.

No one should assume what pronouns a person will use. It is best to take each person’s lead regarding the names, pronouns and title that they use for themselves.

Along with the pronouns ‘he’ and ‘she’, some people prefer ‘they’ as this is a gender-neutral pronoun. This is often asked for by non-binary or some other gender non-conforming people. There are other pronouns used such as Ze/Hir and Xe/Xir. These pronouns are often called neo-pronouns and are often used as neutral pronouns.

A person’s pronouns should not be assumed based on an assessment of their outward appearance. If someone does not make it clear what pronoun they use it is okay to ask. A person could say: ‘which pronoun would you like me to use?’

It is important to refer to a person using their chosen pronouns, whether or not the person is present. For example, if a lecturer is discussing something with another staff member, they should refer to the person with the pronouns that they have requested. If a person makes a mistake with pronouns, whether the student is present or not, acknowledge the error, apologise genuinely, and move on.
Intentionally not using a person’s name or pronoun that they have explicitly asked for can constitute harassment and is a violation of this policy. Accountability procedures are covered in the Harassment and Bullying Policy.

Students will be able to stipulate their pronoun as part of the on-line registration process.

Along with titles such as Mr. and Ms, people may request gender-neutral titles such as Mx, (pronounced ‘Mix’). It is good practice to ensure systems allow for gender-neutral titles as well as for no title. ‘Mx’ is used by the DVLA and UK Deed Poll Service, as well as banks, some councils and other businesses.

11. Official Records and Photographs, documents and monitoring

Some people choose not to change their name formally straight away, have no intention of changing their name or are unable to for other reasons. When a student notifies City in writing of their intention to transition during their time at City, the date from which their name and gender marker is changed on all records should be agreed with the individual. The person’s file should reflect their current name, title and gender marker.

Students will need to formally change their name by statutory declaration of name change or deed poll prior to certificates being issued if they wish for their new name to appear on their qualification certificate. For more on names on certificates see section: Qualification certificates. For those that do not wish to change their name formally but like to be ‘known as’ then this is a request that City must meet where appropriate,

Under the Gender Recognition Act, a person has the right to request that all references to their former name and gender are removed and replaced with their current name and gender.

Disclosure of a person’s trans, intersex or gender non-conforming status without a person’s consent will be a violation of their privacy.

Any material that needs to be kept related to the person’s trans, intersex or gender non-conforming status, such as records of absence for medical reasons, should be stored confidentially. No records should be changed without the written permission of the student.

Photographs should represent an accurate likeness of the student’s current
appearance and so should be updated if this changes. The City card service allows a trans, intersex and/or gender non-conforming student to be issued a new card with updated details and photo free of charge. It should also be noted that some individuals may wish to change their photos without stating anything about their sex or gender identity; this is commonly done under the premise that the photo does not represent an accurate likeness of them.

In circumstances where City requires official confirmation of a person’s identity they will be given the option of providing more than one type of official identification such as driving licence, passport, statutory declaration or birth certificate.

12. International Students

International students who are trans, intersex and/or gender non-conforming may experience additional barriers.

International students who are trans, intersex and/or gender non-conforming may seek support from the International Students Advice Team.

13. Toilet and changing rooms

Trans people are entitled to access any facilities (including toilets) in accordance with self-identified gender and on the basis of appropriate and mutually respectful use by all users.

There are all-gender toilets in some University buildings and their location can be found via CityNav, which can be downloaded through the Student Hub.

14. DBS checks

The Disclosure and Barring Service is responsible for checking criminal records in England. The DBS has processes in place for people have had previous gender identities. This includes those with a full Gender Recognition Certificate who do not wish to disclose their former identity to their employer or placement provider.

Employers and placement providers will provide a DBS form that is to be completed by the person whose criminal record is being checked. Before an application is submitted by an employer or placement provider, the applicant will need to contact the DBS sensitivities team: sensitive@dbs.gsi.gov.uk who will guide them through the process, track the application and maintain confidentiality. The applicant does not need to disclose their gender history to their employer or placement provider.
15. Leave
Students that require periods of time off from their studies should refer to the Interruption of Studies Policy.

In advance of the student’s return to studies the student will need to liaise with their department / named contact / other support services if already engaged with them.

16. Qualification certificates
Qualification certificates state the formal name of a student, not a name by which a student wishes to be known. Students will need to formally change their name and show proof of formal name change (e.g. a statutory declaration of name change or deed poll) in order for a certificate to be issued under a name different from that under which they registered. Students should contact the Student Centre, whereby any of the Student Advisors should be able to support with this process. At City the students’ formal name will appear on their final transcript, interim transcript and other documents that are required for the validation of their qualification or be use of any official purpose.

For alumni wishing to gain a replacement certificate for a qualification that they received in a previous name must provide proof of formal name change.

17. Disabled students’ allowances
It may be that a student who is experiencing mental distress due to, or exacerbated by, their sex or gender identity can apply for disabled students’ allowances (DSA) to access mentoring specifically to support them around their gender identity while studying at university. This is only applicable to UK students.

18. Support groups
Staff may wish to signpost support groups to students who are trans, intersex and/or gender non-conforming, such as student societies. This can help improve the experiences and in turn retention of students.

19. Halls of residence and accommodation
Students at City are offered University of London intercollegiate halls as optional residence. City make every effort to treat issues raised by trans, intersex and gender non-conforming students in relation to accommodation with sensitivity and consideration.
Where single-sex accommodation is available, students will be consulted on whether they would like to be allocated single-sex or mixed-sex accommodation in line with their sex or gender identity or history.

City recognises that some trans, intersex and gender non-conforming students may not feel comfortable using communal toilets and washing facilities in their accommodation provided by the university or its contractors. Where possible, en-suite accommodation will be provided in this instance.

In order to allocate trans, intersex and gender non-conforming students' accommodation to suit their needs, it is useful for City to be aware of those needs when they apply for accommodation. The application form will include a question on gender identity for this purpose. If a trans, intersex and gender non-conforming student is not able to be open about their gender identity in their application for accommodation due to the involvement of a parent/guardian, the student should contact accomm@city.ac.uk to discuss their application in confidence.

City recognises that students might decide to transition at any point during their course. In this instance, accommodation contracts will have the flexibility to allow students to change their accommodation in line with their needs. This might involve moving from or to single-sex accommodation or providing en-suite accommodation.

Where accommodation is provided by private contractors, City will ensure that contractors have processes in place to accommodate trans, intersex and gender non-conforming students.

20. Sport

Participating in sport can be a really valuable experience for students at City. Trans, intersex and gender non-conforming students should have the same access to participate alongside everyone else.

At City, trans, intersex and gender non-conforming students should not be excluded from participating in non-competitive sporting activities and events. In addition, trans, intersex and gender non-conforming students should not be excluded from participating in other roles in sports such as referees, managers or coaches.

For representational competitive sports in Higher Education, the British Universities and Colleges Sport may also be able to assist (www.bucs.org.uk), along with guidance from the Sports National Governing Body.
If a person approaches the sporting body and the person is unhappy with the response, it would not be unreasonable for them to question it. In all situations, please contact the Sport and Leisure Services team at sport@city.ac.uk.

With regards to facilities CitySport has:

- gendered changing rooms/toilets located in the basement of the building
- accessible toilets on levels Ground, First Floor and Second Floor
- an Inclusive Changing Room with cubicles and Showers and lockers, also located in the basement of the building

21. Overseas trips

Travelling abroad can pose problems for trans, intersex and gender non-conforming people. There is no single experience of travelling as trans, intersex or gender non-conforming person. Destinations that look particularly challenging on paper might prove to be straightforward for a traveller (and vice versa). However, it is advisable to assess the risk of travelling, particularly to countries that have a tradition of disproportionate punishments for gender non-conformity and where it will be difficult to access diplomatic assistance. Some students who use passports to travel overseas may not have documentation that represents them and their current gender status accurately, which may cause difficulties during travel. This would need to be considered when arranging any overseas trips or journeys.

City will assist students to assess the risk of travel where it is part of their course. Trans, intersex and gender non-conforming students will not be expected to travel to countries that pose a significant risk to their safety as part of their course. The student will not be put at a disadvantage in relation to other students on their course if they cannot travel due to fears for their own safety.

Safety might refer to physical safety, i.e., safety from physical harm, harassment, but also to safety from being arrested or imprisoned on the basis of gender identity or perception of a student’s gender identity.

22. Field trips

Trans, intersex and/or gender non-conforming students should have the same access to field trips alongside other students. In all aspects, they should be treated in their self-identified gender. City will endeavour to support the student in finding toilets, showers, changing facilities and room allocation with which the student feels comfortable.

It may be that some trans, intersex and gender non-conforming students may not feel comfortable using communal toilets and washing facilities or sleeping in a large dormitory. Where possible, single private rooms with en-suite accommodation should
be provided, where the trans, intersex and/or gender non-conforming student has requested it.

Some gender non-conforming people such as non-binary people may not feel particularly comfortable in either men’s or women’s spaces, so people may wish to think about not allocating dorms based on the gender binary and offering gender neutral facilities.

23. Considerations for employment and placements
City has in place, and works to ensure, support is available for all students whilst they undertake placements in line with their course, regardless of whether this is a short-term placement such as a ‘micro-placement’ or a long-term placement such as a ‘sandwich year’.

Depending on the school or programme of study, the key contact will differ, however these may include: Academic Staff including a Link Lecturer or Clinical Tutor, Work-based Learning Advisor, or any other key members of staff including (but not limited to) Personal Tutor, Mentor or Lecturer.

If a student faces any issues, discrimination, logistical or practical issues or any other experiences whilst on placement, they should contact a member of City staff that they feel comfortable with as soon as possible.

Due to the nature and scope of the placements available, each employer may have a different policy or procedure in place for supporting trans, intersex and gender non-conforming people. City will work with the student and placement provider to ensure a smooth process for all stakeholders.

All City students that undertake a placement, are still students of City, University of London and have full access to all of the support mechanisms in place.

24. Where to find help
City recognises that it is important for students to have access to support regarding their mental health and emotional wellbeing. City 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. Students also have access to City’s specialist Student Counselling Service.

Students with any queries about this document or have a confidential enquiry, please contact the university’s Office for Institutional Equity and Inclusion (OIEI) at
The OIEI wishes to not only 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.

For EDI-related reports (anonymous and identifiable), we encourage students to use the University's You Report We Support system.

For further help, students can also refer to the following University procedures, polices and initiatives:

- Equality, Diversity and Inclusion Policy
- Student Bullying & Harassment Policy
- Student Support
- Students’ Union Advice Team

25. Definition/Glossary of Terms

For a glossary of terms, please refer to the TIGNC People Policy.

26. Document Control

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**Document Location**

https://staffhub.city.ac.uk/human-resources/policies