

## Code of Practice: Supporting Gender Transition & Gender Identity (Staff)

### 1. INTRODUCTION

Keele University supports equality of opportunity and the promotion and celebration of diversity. We are committed to treating people no less favourably than others on any grounds including gender transition and gender identity. This commitment applies both to people undergoing or having undergone gender transition and living in their affirmed gender. We are also committed to ensuring that there is no discrimination on the basis of gender transition, gender identity or gender expression. This enables us to positively reinforce equality of opportunity and support all staff, students and stakeholders to feel safe and supported in their learning, working and living environment.

#### 1.1 Purpose

This Code of Practice aims to increase understanding and awareness of our commitment to equality for staff undergoing or having undergone transition and sets out a framework for enabling and supporting members of staff.

This Code of Practice is in addition to our Gender Identity and Gender Transition Statement of Commitment and Respect, which is a brief document for all staff. For gender transition of students please see our Student Gender Transition policy.

This Code of Practice supports the requirement that staff undergoing or having undergone gender transition at Keele must not be discriminated against, harassed or victimised as set out under the [Equality Act 2010](#). It should be noted that the Equality Act 2010 refers to gender reassignment as the protected characteristic but we would interpret this as gender identity and gender expression more widely. Importantly, the Equality Act requires no medical supervision or interventions for a trans person to be afforded protection. Whilst this Code of Practice focusses on gender transition it should be noted that individuals may identify under the trans umbrella without undergoing any changes to physiological or other attributes of sex (see our Gender Identity and Gender Transition Statement of Commitment and Respect). Trans people may identify as female, male or as having a non-binary identity.

In addition, this code of practice takes into account our responsibilities under the [Gender Recognition Act 2004](#). The act allows trans people to apply for a Gender Recognition Certificate (GRC) which gives legal recognition of their affirmed gender and allows birth certificates to be reissued in accordance with their gender identity. Not all trans people decide to obtain a GRC and staff should not be asked to provide one.

It is a criminal offence to divulge knowledge obtained in an official capacity on a person's gender identity history without their consent. The University protects personal data in accordance with the [Data Protection Act 2018](#) and the [EU General Data Protection Regulations \(GDPR\)](#) and the [Human Rights Act 1998](#) provides protection under the right to a private life.

Gender transition is a unique process for each individual and may include any number of changes to a person's life. Timescales, activities and communication will be driven and led by the person transitioning, with support from line management and Human Resources.

The Keele Equality and Diversity Strategy, which details Keele's Equality Objectives, sets out ways in which we will promote equality for all our staff, students and stakeholders, including staff who identify under the trans umbrella. In order to help facilitate our equality objectives, we take part in a number of charter mark and equality index schemes. Of particular relevance is our commitment to:

- the Athena SWAN principles including the commitment to “tackling the discriminatory treatment often experienced by trans people.” and
- the engagement with the Stonewall's Diversity Champion's programme, with the aim of improving equality for staff who identify under the trans umbrella as well as those who identify as Lesbian, Gay or Bi.

## 1.2 Scope

### **Keele University's Commitment**

The University is a fair and inclusive employer and is fully supportive of any employee who expresses an intention to undergo gender transition or who has already transitioned. We support all trans staff including non-binary staff.

Accordingly, we make the following commitments to supporting members of staff undergoing or having undergone gender transition:

- complying with relevant legislation and codes of practice
- ensuring that current and prospective staff are treated solely on merit, ability and potential relating to all aspects of their employment, irrespective of whether they are undergoing, or will be undergoing, gender identity transition
- ensuring that members of staff undergoing or having undergone gender transition are treated no less favourably or subject to discrimination or harassment on the basis of their gender transition, gender identity or gender expression.
- dealing promptly and properly with any complaint of harassment or discrimination against any member of staff on any grounds, including gender identity, and instigating disciplinary proceedings as appropriate
- promoting our commitment to treating all staff with fairness, dignity and respect and supporting equality for staff undergoing or having undergone gender transition by creating a secure and supportive environment throughout the organisation.

These commitments will be achieved by:

- working with staff undergoing transition and their colleagues/students as appropriate to support as smooth a transition at work as possible
- ensuring that staff undergoing or having undergone gender transition are treated no less favourably than anyone else in any aspect of their employment including

recruitment and selection, terms and conditions, promotions and training or development opportunities

- ensuring all practices, policies and procedures meet legislative requirements and that they do not discriminate against staff undergoing or having undergone gender transition
- respecting a person's right to self-identify as female, male, non-binary or any other gender identity that they feel comfortable with and recognising people in the gender identity in which they choose to present
- amending our records so that all employment rights are retained and reflect the correct name and or gender identity<sup>1</sup> of the individual
- ensuring that the guidelines for staff undergoing or having undergone gender transition are well publicised and that, where staff feel discriminated against, harassed or victimised, procedures are clear to follow (see also our Procedure to Deal with Bullying and Harassment).
- supporting Keele's Staff Lesbian, Gay, Bisexual and Trans (LGBT) Group to provide a channel for consulting and engaging on relevant issues
- recognising the right of individual staff to be open, or to 'come out' about their gender identity or gender transition status and for their position to be respected and recognised
- recognising the individual's right for their gender identity to be kept private if they prefer this to be the case and that a person's gender identity history is protected by the Data Protection Act 1998.
- providing appropriate training for staff on issues concerning staff undergoing or having undergone gender transition, which also clarifies their responsibilities (see also 2.2)
- ensuring that all relevant procedures are confidential and taking steps to reassure staff undergoing or having undergone gender transition that this is the case.

### Key Definitions

In understanding the application of this Code of Practice there are some key words and concepts which need to be defined and understood. Definitions are derived from the Equality Challenge Unit's 2016 publication entitled 'Trans staff and students in HE and college: improving experiences'. It should be noted that terminology changes and its use can be highly individualised, some, people may adopt one term that another finds inappropriate. Further details of terminology can be found from Keele equality webpages or from [Stonewall's glossary of terms](#).

**Gender** - refers to the cultural and social distinctions between men and women. It consists of three related aspects: (1) **society's constructed gender roles**, norms and behaviours which are essentially based on the **sex assigned at birth**; (2) **gender identity**, which is a person's internal perception of their identity and (3) **gender expression**, which is the way a person lives in society and interacts with others.

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<sup>1</sup> For HMRC purposes sex can only be recorded as female or male; for KeelePeople staff can record their gender as female, male or other.

Gender does not necessarily represent a simple binary choice: some people have a gender identity that cannot be defined simply by the use of the terms woman or man and may wish to define their gender with one of a number of terms for example **non-binary**. In addition to how people perceive their gender there are also people whose biological sex is not simply defined as female or male. These people might in some cases wish to define as **intersex**.

It should be noted that currently, for the purposes of UK law, sex is understood as binary (male or female) and legal sex is that recorded on an individual's birth certificate. A trans person can, at the time of writing, only change their legal sex by obtaining a Gender Recognition Certificate.

**Trans/transgender** - are inclusive umbrella terms for people whose gender identity and or gender expression differs from the sex (male or female) they were assigned at birth. The term may include, but is not limited to, trans men and women, non-binary people and dual role people. Not all people that can be included in the term will associate with it. The terms trans should only be used as an adjective, for example, trans people, trans man or trans woman. However, a trans person may say 'I am trans'. The term **transsexual** is also sometimes used but many find it outdated and are concerned that it may lead to confusion of gender with sexuality.

The terms **cis, cisgender or cissexual** may all be used to describe people who are not trans.

**Transition** - is the process of a person changing their social role in order to match their gender identity. Examples of transitioning might include, but are not limited to, (i) telling friends, family and colleagues, (ii) changing names, (iii) asking people to use different pronouns, and (iv) changing the way gender is expressed. For some people, this may involve medical assistance such as hormone therapy and surgery.

## 2. PROCEDURE

Any member of staff who undergoes gender transition whilst employed by the University will have particular support needs and we expect relevant managers and staff to take an active role in responding to these needs. The following items (2.1 – 2.11) give an overview of expectations during gender transition or in supporting those who have transitioned. Annex A gives more practical notes on how to take action; Annex B gives a layout for an action plan.

### 2.1 Initial timeline

A member of staff who intends to transition will need to **notify the University**. It is important that the University works in collaboration with the member of staff who will be transitioning and staff are encouraged to inform their line manager or Human Resources as soon as possible. Different people will want to transition in different ways but for some people it may be that they want to make a number of changes simultaneously, before presenting in their affirmed gender. In this case a period of time will be required in order to prepare for such changes and facilitate a smooth transition. Confidentiality must be maintained and the member of staff must be assured of this confidentiality.

In most circumstances the member of staff should contact their line manager or their link Human Resources manager to notify them of their intention to transition. This can be as part of a conversation or in writing. The line manager or link Human Resources manager should then support the individual with a promptly written confirmation of their understanding and should then organise a meeting with the person and offer reassurances that we will support them during their transition. People invited to attend the meeting may include the person's manager or head of department, or a member of the human resources team. The member of staff undergoing or having undergone gender transition may also wish to be accompanied by a person of their choice.

In advance of the meeting, and with the permission of the person undergoing transition, it might be helpful to send attendees information about gender identity issues, and a covering note explaining the person's intention. There must be a clear statement of confidentiality, emphasising that the person's transition must not be discussed with anyone else.

At the meeting, the transitioning member of staff should be informed about the support available within the University, including **confidential occupational health and/or counselling services**. Part of the purpose of the meeting is to determine impacts in terms of changes required in the University (such as personnel records, email addresses and contact details, other administrative issues and so on) or other specific issues concerning the University as an employer and a workplace. In addition, if the person undergoing gender transition has any scheduled medical appointments, or other commitments in relation to their gender transition, these should be noted, so that the line manager can arrange cover or reschedule work, if required (see also section 2.9). Beyond that a person undergoing gender transition might choose to inform the University of any other matters pertaining to their gender transition that they are comfortable with sharing and that they feel is necessary or appropriate. At this meeting, the person undergoing transition might like to discuss whether any further meetings are needed and who should be invited.

In most cases gender transition will require action at work (e.g. name changes, informing colleagues etc.) and, therefore an **action plan**, including timescales, should be drawn up. The action plan and timescales will need to be reviewed periodically with the staff member concerned. The action plan should be confidential, and discussion should take place to agree where copies should be kept and who should have access. Further information on producing and updating the action plan can be obtained from Human Resources.

## 2.2 Communicating the transition: Managing the reactions of colleagues and students and showing respect

The member of staff undergoing gender transition may want to tell colleagues or students about their transition personally or they might want a line manager or other representative to inform colleagues. The method of transmission of information, whether this is in person or written, together with the format and content, should be discussed and agreed in full with the member of staff undergoing transition in advance of any communication.

It is important that the member of staff's manager and other appropriate senior members of staff are seen to be supportive and that they make it clear that the person who is transitioning has the full support of the University. The University's commitment to equality should be reiterated, and the responsibilities of staff to support this commitment should be emphasised.

The following basic ground rules on respecting people who are transitioning should be adhered to by all staff:

- Use the correct name and pronoun (he/she/they/ze; his/her/their/zir) - the person's name and pronoun that accords with their gender identity. If you do not know a person's pronouns you may ask.
- If you make a mistake with pronouns, apologise, correct yourself and move on.
- Respect people's privacy and boundaries – prying personal questions, jokes or remarks at the persons' expense and generally insensitive behaviour are never acceptable.
- Remember that everyone has the right to confidentiality – someone else's transition and (current or former) personal details are not yours to share (see also GDPR and Data Protection legislation).
- Relate to the person in their new gender identity and within the context of the role they hold, as you would do with any other person/colleague.

It may be appropriate to require colleagues to attend **training or awareness raising sessions**. Any training undertaken should advise and support colleagues to understand what is expected of them and provide them with the opportunity to ask any questions. It must be made clear that questions must be appropriate and respectful.

### 2.3 Practical Concerns

Any practical concerns such as use of **toilet or changing rooms** can be discussed at action planning meetings. Staff should be reassured that they can use the facilities which they feel are the most appropriate and that gender neutral toilets, showers and changing areas are available on campus<sup>2</sup>. Many practical concerns will relate to **name and title changes** on documentation, identity cards and websites etc. In addition, there may be specific role-related concerns. The gender transition action plan template is a guide for staff and their line managers to work through, in order to help address some of these challenges and better define some likely areas where changes will need to be made.

### 2.4 Role Specific Changes

**Disclosure and Barring Service:** For a number of roles in the University criminal records checks are required. The Disclosure and Barring Service (DBS) has a special applications procedure in recognition of the fact that checks might reveal the previous gender identity of the applicant. Further information is available confidentially from the DBS, via their sensitive applications team.

**Genuine Occupational Requirements:** Keele University is committed to working in full compliance with the law in respect of all issues concerning occupational requirements. In most situations in Higher Education the gender of a person is of no relevance to their ability to carry out their job. However, there is an exception relating to sex and gender reassignment under some circumstances. Gender-related exceptions might apply to certain posts such as particular positions in single-sex halls of residence. Any occupational requirement must be identified at the beginning of the recruitment and selection process, and it must be stated in the application pack. If a person, who is undergoing gender transition is already in a post that has an occupational requirement to be

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<sup>2</sup> Locations are available from <https://www.keele.ac.uk/equalitydiversity/equalityareas/genderreassignment/>

carried out by a person of a particular gender then it is essential that the University and the individual meet to discuss the situation as soon as possible.

**Dress codes:** There is no single dress code covering staff at Keele. However, some areas of the University do have uniforms and other areas have expected standards to meet requirements of the role and associated health and safety risks. Where gendered uniforms are worn, managers will work with staff to ensure they are supplied with uniforms they are comfortable wearing and managers should be mindful that more than one uniform may be required. Where uniform items need ordering these should be done so promptly and the staff member informed of the likely delivery date. Any other dress expectations that are related to role requirements should be discussed as required.

Changes in an individual's gender expression in terms of dress, hair or make-up should not normally be commented on. The exception would be where changes do not meet expected standards or requirements of the role and any associated health and safety risks. For example, in some areas of the University (e.g. for clinical roles or catering), it would not be acceptable to wear false nails: this should be regardless of gender.

## 2.5 Overseas Staff and Travel

Particular attention should be paid to overseas travel of transgender staff (for example for overseas work, conference attendance, field work etc.) to ensure that risks are fully considered. Many countries have no laws to protect transgender people's rights.

If a staff member is faced with returning to a country where they have a well-founded fear of persecution due to their gender transition or gender identity they might like to take legal advice on making an asylum claim.

Further details on sources of advice on travel or asylum is available from:

<https://www.keele.ac.uk/equalitydiversity/equalityareas/genderreassignment/>

## 2.6 Confidentiality

Staff confidentiality and privacy is protected. It is a criminal offence to divulge knowledge obtained in an official capacity on a person's gender identity history without their consent. The University protects personal data in accordance with the Data Protection 2018 / EU General Data Protection Regulation and consent from the person will be required before information about their transition or gender identity is discussed or disclosed.

Human Resource staff will ensure that historical documents that contain references to the staff member's previous name can be accessed only by a limited number of individuals. This could include copies of historical documents (e.g. certificates in a former name) or relating to an individual's attendance on training courses, maternity or paternity leave, or grievances raised.

## 2.7 Pensions

The state pension age of women now matches that of men (2011 Pensions Act). Thus, gender differences in state pension only apply to staff who are already eligible for, their state pension.

Any member of staff undergoing gender transition should contact the Payroll and Pensions Office

as soon as possible to discuss the particulars of the relevant University-approved pension scheme in the context of their gender transition.

## 2.8 Recruitment

Recruitment and selection should always be based on finding the best person for the job. Appointments must be made purely on the basis of fit to the requirements of the job description and person specification.

Human Resources will:

- Regularly review and monitor recruitment and selection procedures to make sure that they are fair and reflect current best practice
- Ensure that all staff involved in recruitment attend recruitment and selection training
- Promote the University as an Equal Opportunities employer

There is no obligation for a person undergoing or having undergone transition to disclose this as a condition of employment. If an applicant chooses to disclose that they are undergoing or have undergone gender transition, this will not be grounds for consideration of their suitability to carry out the role.

We recognise that there could be issues in managing the appointment process for people in the process of transitioning gender. The University has a legal obligation (under the 1996 Asylum and Immigration Act) to ensure that all employees have a valid entitlement to work and reside in the UK. Therefore, as part of the appointments process all prospective staff have to produce documentation, which will include either a passport or birth certificate. An applicant who is transitioning and has begun to live in their new gender may find this requirement difficult. It is therefore important to ensure that the documentation will be held and processed confidentially by Human Resources, and to reassure the applicant that this will be so.

Some EU and international staff who have a non-binary gender identity may have passports that reflect this identity.

A further guidance note is available for Human Resources administrative staff.

## 2.9 Absence: time off for treatment

The law recognises that someone undergoing gender transition may require substantial periods of time off work for medical procedures. The university will support those transitioning with time off, in the same way as someone who is absent from work for reasons of sickness or injury. This would involve, where appropriate, consideration of working patterns and/or duties.

The Equality Act 2010 states that it is discriminatory to treat gender reassignment related absence less favourably than absence due to sickness or injury. Additionally, should the person with the protected characteristic be absent for some other reason it is not reasonable for them to be treated less favourably than other members of staff.

Depending on the way in which a person chooses to transition there may be little or no time of work required. In other cases, for example, where an individual undergoes surgery, considerable time of work may be needed for treatment and recovery. Therefore, length of time that medical treatment

takes is variable and will also depend upon whether the individual has treatment from the NHS or through private clinicians. Should someone wish to have surgery it would take them a number of years to have treatment through the NHS.<sup>3</sup> As with any scheduled medical treatment, the individual undergoing treatment would need to communicate requirements for time off with their line manager, in order that work can be rescheduled or reassigned. Individuals undergoing medical transition should be made aware of University [Staff Sickness Absence Policy and Procedures](#). Details of entitlement to University Sick Pay are available in the individual's terms and conditions of employment.

For non-medical time off or flexible working relating to transition managers and staff are referred to our [Flexible Working Policy](#).

### 2.10 Bullying, Harassment and Victimisation

People undergoing or having undergone gender transition, or making changes to the expression of their gender identity, may suffer from harassment, victimisation or discrimination on the basis of their gender transition, gender identity or gender expression. The University has a staff Policy and [Procedure to Deal with Complaints Regarding Bullying, Harassment and Victimisation](#) and a [Grievance Procedure](#) (both available on the Keele Intranet Human Resource webpages). The University takes a zero tolerance approach to transphobia, as with all incidents of bullying and harassment. Transphobia can take many forms. Examples include refusing to call someone by their correct name or hurtful comments about someone's dress or appearance.

If staff feel that they are subject to discrimination, harassment or victimisation on the basis of their gender transition, gender identity or gender expression, they are strongly advised to try to take steps to resolve matters informally at an early stage by discussing it with their line manager, a trade union representative a member of the University Equality and Diversity Team or an HR Advisor / Manager.

Complaints about discrimination, harassment and victimisation on the basis of gender transition, gender identity or gender expression are taken very seriously at Keele University and could, on full investigation, provide grounds for disciplinary action.

### 2.11 Ongoing support of a staff member who is transitioning

People undergoing or having undergone gender transition, or making changes to the expression of their gender may require ongoing support. This should be led by the individual concerned but might include use of [Keele's Counselling service](#) or help from the [staff LGBTI network](#).

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<sup>3</sup> In January 2018 the BBC reported that "The average wait from receiving a GP referral to getting a first appointment is 18 months" and the Gender Identity Clinic (at The Tavistock and Portman) state (July 2019) that "We have seen an unprecedented rise in referrals in the last year. The number of referrals has outstripped the number of available first appointments by a factor of 2 to 1. Our highest priority is the safety and well-being of the people we support in our service. We cannot currently give an estimation for how long a new referral will have to wait as this depends on many factors."

### 3. ROLES AND RESPONSIBILITIES

This procedure applies for existing members of staff undergoing gender transition. Parts of the procedure may also be useful when members of staff declare a change in their gender identity or where staff start work at Keele during or after gender transition.

At the institutional level the Vice-Chancellor has overall responsibility for ensuring the University complies with all relevant legislation and that all policies and practices do not discriminate on these grounds.

The Human Resources Directorate is responsible for the development and implementation of this Code of Practice and any further policy development required with regard to this issue. Human Resources will provide a named contact, for staff undergoing transition or with questions on trans equality (see Keele's Equality and Diversity webpages). In addition, Human Resources will also deliver any associated training or communication requirements.

Faculty Deans, Directors and their reporting managers have a particular duty to ensure that none of the staff for whom they are responsible are subjected to disadvantage on the grounds of their gender identity or gender expression. All staff in a managerial position are responsible for seeking to prevent any infringement of the Code of Practice amongst staff for which they are responsible, taking action as appropriate.

The line manager has overall responsibility for drawing up any action plan that may be required for gender transition working closely with the member of staff who is transitioning or changing gender identity. Human resources will identify an EDI Lead to work with the member of staff and their line manager. The EDI Lead, in conjunction with Organisational Development, will be responsible for organising any training should it be required. Hannah Barjat ([h.r.barjat@keele.ac.uk](mailto:h.r.barjat@keele.ac.uk)) is able to answer further questions on the procedure.

Further action owners will be identified in drawing up the action plan.

The action plan template (Annex A and B) is designed to help managers, on behalf of Keele, to be supportive in helping to make practical changes. Whilst helping to manage gender transition at work the manager will also:

- show our trans staff that their work is valued;
- demonstrate to all staff that we value trans inclusion; and,
- empower staff to become trans allies.

The action plan should be shaped, as much as possible, by the staff member, who is transitioning or affirming their gender identity.

All members of the University are responsible for contributing to ensuring that colleagues do not suffer any form of discrimination on the basis of their gender transition, gender identity or gender expression, and that they are supportive of individual needs. Every person at the University will be accountable for their own behaviour and actions within the context of this Code of Practice.

#### 4. RELATED POLICIES AND PROCEDURES

Related Keele documentation includes:

- Gender Identity and Gender Transition Statement of Commitment and Respect (a guide for all staff)
- [Procedure to Deal with Complaints Regarding Bullying, Harassment and Victimisation](#)
- [Keele Equality and Diversity Strategy](#)
- [Keele Equality Objectives 2018-2022](#)
- [Keele Gender Transition Policy \(Students\)](#)

Related legislation can be found at:

- [Equality Act 2010](#)
- [Gender Recognition Act 2004](#)
- [The Human Rights Act 1998](#)
- [Data Protection Act 2018](#) and the [EU General Data Protection Regulations \(GDPR\)](#)

#### 5. REVIEW, APPROVAL & PUBLICATION

In drawing up this documentation we seek input and guidance from:

- Our Stonewall Client Account Manager
- Our LGBTI Staff Network
- The Trades Union Oversight Group

The University Equality, Diversity and Inclusion Steering Group has overall responsibility for approval.

This document can be found from Keele Equality webpages. Alternative formats are available from [Hannah Barjat](#), extension 33339.

## 6. ANNEX A: Action Plan Template Notes

The action plan template is designed to help assist with making practical changes. The action plan should be shaped, as much as possible, by the staff member, who is transitioning or affirming their gender identity, and, in the following procedural section, “you” is used to refer to that staff member. However, agreement with line management is important and support will be provided by Human Resources should it be sought or should difficulties arise. Before completing the action plan you and your manager should read through the complete policy. If there are any questions, staff from Human Resources should be able to answer these.

The action plan is provided primarily for gender transition. However, new members of staff who define as non-binary or trans might also find parts of the action plan helpful.

### 1. ACTION PLAN TEMPLATE Notes

You and your line manager will complete the action plan template (Annex B) with timelines and the person responsible throughout following guidance points 1.1 – 1.13 below.

The action plan should be sufficiently flexible to take account of changing circumstances and preferences.

There should be agreement on the confidentiality of the plan and who will have access to it. It is essential that the need for confidentiality and data protection are understood by all of those involved.

The practical changes that may be required are itemised below. However, this is not an exhaustive list and not all changes will be needed for all staff. Some changes need to be managed by the line manager, others can only be made by the person undergoing gender transition and some will be made by the relevant professional services staff.

#### 1.1. Initial timeline

You should first contact your line manager to arrange a meeting. You might also like to ask a colleague to attend the meeting with you. It could also be useful to invite a member of the EDI team to the meeting.

You should then agree a timeline for actions under the following sections. You will need to take into account any time required to make any practical changes, should you want these to be completed before you present in your affirmed gender at work.

**For consideration:** Is there a particular time when you would prefer to present in your affirmed gender at work?

#### 1.2. Communicating the transition or declaration of gender identity

You will need to discuss and agree the method and content of the communication of your gender transition/ gender identity and adapt approaches as necessary for:

- close colleagues and/or direct reports;
- other staff members;
- relevant third parties (e.g. students, co-workers, grant funding bodies, others you are regularly in contact with).

**Associated points:** You will need to decide who is told, how they are told and what they are told with the support of your manager. You should not be pressurised into taking responsibility for informing people yourself but you may choose to do so, if you wish. You need to agree:

- Who needs to know about your transition (and why).
- When should they be informed of your transition.
- Who should inform people of your transition.
- How they should be told.
- Whether you will be directly involved in telling people.
- What general and specific information needs to be communicated (e.g. names and pronouns, a reminder about respect).
- How immediate work colleagues and/or direct reports can support you.
- How queries will be handled.

Your manager will help to ensure that you are addressed by your chosen name and that your correct pronoun and prefix are used.

### 1.3. Name and title changes

Anything that holds your name, title or information that could reveal your previous identity needs to be amended to coincide with you presenting in your new identity. The following is a list of changes that might need to be made. A number of people may need to be involved in making these changes and these should be agreed. Some changes can only be made by the staff member themselves. In the list below there are some suggested responsibilities. However, these may be changed depending upon circumstances.

#### **Important Notes:**

(i) Preferred names can be changed at any point on the KeelePeople Employee Self-service and the preferred name will be displayed on IT account details when updated. However, formal name changes, for example for purposes of being paid, will require a change by Deed Poll which can be a cost-free and simple process (<https://www.gov.uk/change-name-deed-poll/overview>). Other organisations, including some banks, and other countries may have different requirements for name changes.

(ii) Changes to your title and sex recorded on KeelePeople can currently only be made through HR. The gender-neutral title Mx is included as an option within the KeelePeople database. This is the pronoun of choice for some people with non-binary gender.

(iii) Information relating to gender identity (i.e. whether or not your gender identity is the same as that assigned at birth) can be updated by the employee through KeelePeople Employee Self-service at any point.

Examples of records that may need changing include:

- Keele card;
- IT accounts - accounts / email address / online phone book;
- IT document systems e.g. properties authorship;
- Human Resource records and KeelePeople database (EDI lead in HR);
- Payroll records (EDI lead in HR);
- Departmental administrative records – staff lists / contacts / organograms (Manager)
- For academic staff: programme and module lists / prospectuses / handbooks (Manager);
- Individual website profiles / meet the team profiles (Manager);
- Membership of Keele and external University groups / lists / committees;
- Informal and formal networking / social groups / societies / sports clubs;
- Professional memberships;
- Driver's licence;
- Bank account details;
- Pension and any other employee benefits (seek advice from Payroll - via EDI lead in HR)
- Other forms of insurance (e.g. for fieldwork)
- HMRC (Payroll - via EDI lead in HR & Staff member)
- Name badges (Manager)
- Door plate (Manager)
- Business cards (Manager)
- Voicemail;
- Company photos (Manager / Staff member); and
- Standard communications with service users (Manager/Staff member)

You will be able to change many of the above yourself. However, where University assistance is required your Manager and an assigned EDI lead in HR will be available to help, in the list above some instances where these people might be responsible, for actions, are indicated by text enclosed in brackets.

You may want to make several updates to photographs (e.g. on Keele card) throughout the process of transition.

Names on publications may be important for some staff members and these may be problematic, depending upon whether initials have changed or if the full first name is given. Some publishing organisations allow publications to be linked by previous names.

Changing names on degree certificates may be problematic as this depends upon the awarding body. Keele will make retrospective changes to names on degree certificates that Keele has issued (see Student Transgender Policy). There is separate guidance for Human Resource administrators in accepting degree certificates issued under different names.

#### 1.4. Role Specific Changes

You should discuss any role specific job requirements with your line manager that might require changes. For example:

If you require a Disclosure and Barring Service (DBS) check, for your work, it should be noted that the DBS has a sensitive applications process (found through the DBS website).

There a very limited number of jobs in the University that are likely to have an occupational requirement to be carried out by a man or a woman. However, if this is relevant, it needs to be discussed and changes agreed as a matter of urgency.

### 1.5. Overseas Staff and Travel

(i) For relevant overseas staff:

- You will need to inform UK Visas and Immigration of your change in personal circumstances.
- You may discuss any issues relating to your home country with your line manager and Human Resources, if required.

(ii) For Keele staff working / attending conferences / field work abroad

You should seek information on travel to different countries that you might carry out in the course of your work, discuss any concerns with your line manager and agree changes as necessary.

### 1.6. Dress codes

If appropriate, you and your manager should discuss uniform. Managers will work with you to ensure you are supplied with uniforms that you are comfortable wearing. Managers will be aware that more than one uniform may be required and they will discuss, with you, any time required for order and delivery of uniform.

If appropriate, you and your manager should discuss dress codes. For more detail on dress see section 2.4.

### 1.7. Use of toilet / changing room facilities

You and your manager should discuss any practical concerns such as use of toilet or changing rooms. You should be reassured that you can use the facilities which you feel are the most appropriate and that gender neutral toilets, showers and changing areas are available on campus, should you wish to use them. See more information from:

<https://www.keele.ac.uk/equalitydiversity/equalityareas/genderreassignment/>

### 1.8. Confidentiality

In drawing up your action plan you may want to consider who has access to your information and discuss any concerns that you have. NB Staff have mandatory training relating to the Data protection act 2018 / EU General Data Protection Regulations, which protect personal data.

### 1.9. Pensions

You should ensure that name changes are completed with any current or former pension provider. It might also be appropriate at this time to check any next of kin contacts / dependant's benefits.

Few staff would now be affected by difference in UK state retirement age and, hence, state pension. In some instances advice from Payroll might be required.

### 1.10. Absence

You will need to communicate any existing medical appointments, so that your manager can arrange cover, if required, and you will need to agree with your manager how future appointment times or expected longer periods of absence will be communicated.

#### Associated points:

- Human Resources do not automatically schedule communications about staff absence i.e. they will not recommend referral to the Department of Occupational Health, unless this is requested by you or your manager.
- Time off for medical appointments should be treated as any other medical appointment.
- Extended time off for surgery and other medical interventions may be required. This would be treated as sickness absence.
- The time off required would depend on the nature and extent of the treatment that you undergo.
- You should discuss in advance how much time off might be required for treatment. Your manager should allow for flexibility, as with any other type of treatment.
- Your manager will plan for absences e.g. by arranging cover for you if necessary.
- The period of time taken to complete gender reassignment will depend on where you are having treatment because waiting times for treatment vary across the country. Your manager will be aware of this (from section 2.9) but you may wish to update them as relevant.
- You may need to travel some distance for treatment and you may need to inform your line manager of this, so that they understand implications for attendance at appointments.
- Your manager should be aware that some people transition without any medical intervention at all (section 2.9) but you may nevertheless need time off to make other arrangements related to your gender transition and this should be discussed.

### 1.11. Training on transgender staff issues

If a need is identified, training of colleagues should be discussed and agreed with Human Resources.

#### Associated points:

- Timing and context for training is important: it should not make you feel uncomfortable.
- Training is part of the organisation's ongoing commitment to offering an inclusive workplace and attendance at EDI training is an expectation following recruitment.

### 1.12. Bullying, Harassment and Victimisation

Your manager should be aware of examples of transphobia (section 2.10) but you should discuss any concerns that you might have. Your manager should ensure that you are aware of the University's anti-bullying, harassment and victimisation policy.

As appropriate your manager should remind others of the University's commitment to equality, diversity and inclusion and that any transphobic bullying, harassment or victimisation will not be

tolerated. Your manager should also remind others that you are not expected to deal with any unnecessary intrusion into your private life.

### **1.13. Ongoing support of a staff member who is transitioning**

You should agree with your manager the frequency and timing of any future meetings should they be required.

Your manager should remind you that help is available from the (i) Staff Counselling and Occupational Health Services and (ii) Human Resources, in particular, through the Equality and Diversity Team, should you wish to access further advice.

Your manager should circulate the draft action plan, on a confidential basis, to you and other any people present at the meeting for review and correction as appropriate. You must give written agreement e.g. in the form of an email to the final version of the action plan for it to be implemented.

You and your manager should ensure that the action plan is implemented to time and that you have an appropriate support system in place should any issues arise during the course of your transition.

**ANNEX B: Action Plan Template Form**

<b>Template for Action Plan: to be resized appropriately<sup>4</sup></b>		
<b>Action</b>	<b>Person Responsible</b>	<b>Completion date</b>
(1) <u>Initial timeline</u>		
(2) <u>Communicating the transition</u>		
(3) <u>Name and title change</u>		
(4) <u>Role Specific Changes</u>		
(5) <u>Overseas Staff and Travel</u>		
(6) <u>Dress codes</u>		
(7) <u>Use of toilet / changing room facilities</u>		
(8) <u>Confidentiality</u>		
(9) <u>Pensions</u>		
10) <u>Absence</u>		
(11) <u>Training on transgender staff issues</u>		
(12) <u>Bullying and Harassment</u>		
(13) <u>Ongoing support of a staff member who is transitioning</u>		

<sup>4</sup> A Word version is available from HR.

## 7. DOCUMENT CONTROL INFORMATION

<b>Document Name</b>	Gender Transition and Gender Identity: Action Plan Template
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