Gender Diverse Policy

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1. Overview and definitions

This policy has been constructed to provide guidance and advice to all employees on the Company's approach to gender reassignment. Its primary goal is to inform upon what gender reassignment/transition is and how our employees are supported and protected throughout their employment.

We are an equal opportunities employer. As a Company, we are committed to ensuring that no person is victimised or subject to any form of bullying or harassment because of any protected characteristic, including gender reassignment. As such, we will always take steps to promote a diverse, positive and safe working environment for all of our employees, working against unfair and unlawful harassment and discrimination. We will fully support an employee during, and subsequent to, their gender reassignment.

This policy concerns all persons who identify as trans. 'Transgender' or 'trans' is an inclusive term for people whose gender identity differs from that which they are assigned at birth, or those whose gender expression or presentation differs from the typical and who self-define as trans. It is not necessary to have undergone, or plan to undergo, surgery or hormone treatment to identify as trans, although a decision to live permanently as another gender is required to be covered by this policy.

2. The law

UK legislation designed to protect from discrimination persons who identify as transgender and establish their rights is outlined below:

Gender Recognition Act 2004 – outlines requirements for the application of a Gender Reassignment Certificate (GRC).

Equality Act 2010 – prohibits any form of discrimination, as well as harassment, against those who have undertaken or are undertaking gender reassignment.

3. Communication

Employees who have undergone gender reassignment are not required to inform the Company of their gender status. However, employees who are undergoing or planning to undergo gender reassignment are encouraged to speak to their line manager so that the appropriate support may be offered. All conversations of this nature will be held in the strictest confidence. The employee and their manager will discuss the key issues around the transition, which are likely to be:

- Communication with colleagues and customers/clients about the gender reassignment, including when and how this will be done
- Confirmation of records that will need to be changed e.g. personnel records, name badge etc.
- Any absence from work related to the transition process and how that will be dealt with

- Reiteration of the ethos of confidentiality with which the transition will be dealt
- Temporarily or permanently changing job roles
- How any time off work in relation to the transition will be dealt with.

The HR department will be informed of the employee's acquired gender and all necessary steps will be taken to ensure the employee's acquired gender is reflected in Company records. All personal data held by the Company will be processed in accordance with our data protection policy. Please note that an employee does not need a GRC certificate in order to change their name and title.

4. Confidentiality

All conversations regarding an employee's gender reassignment, or proposed gender reassignment, will be held in the strictest of confidence. The disclosure of information regarding the employee's transition will be restricted to only those employees who are required to know in order, for example, for records to be updated.

We recognise an individual's right to privacy and no disclosure will be made regarding an employee's transition without the employee's consent. In any case, disclosures will be restricted to those circumstances which are essential. Great care will be taken to ensure that no inadvertent disclosure is made. Anyone who, through intention or carelessness, allows disclosure of information of an employee's gender history without consent may face disciplinary action.

- **USE OF### 6. Facilities

When an employee has declared that they are living life fully in their acquired gender, we respect the employees' right to use facilities (e.g. toilets, shower rooms) which are appropriate to their acquired gender.

- **DRESS CODE**

During an employee's transition, the Company will discuss with the employee any flexibility with the dress code to accommodate the process of transition. Once the employee has declared they are living life fully in the acquired gender, the dress code applying to their acquired gender will apply.

- **HARASSMENT AND BULLYING**

The Company operates a zero-tolerance policy towards any kind of harassment or bullying. No individual is to be subjected to harassment or bullying for any reason connected to their gender reassignment. Complaints of bullying or harassment will be investigated thoroughly and anyone found to have engaged in such behaviour will be subject to the disciplinary procedure. Disciplinary action could result in a formal disciplinary sanction up to, and including, summary dismissal. Examples of harassment include:

- Referring to an employee by their birth name/pronoun
- Asking transgender employees intrusive questions about their transition
- Making inappropriate jokes about gender reassignment
- Physical attacks or threat of physical attack
- 'Outing' a transgender employee
- Refusing to work with an employee who has undergone gender reassignment

Our anti-discrimination stance on gender reassignment extends to both associative and perceptive discrimination. Associative discrimination includes discrimination against an individual because they associate with a transgender individual. Perceptive discrimination includes discrimination on the grounds that it is perceived that an individual has undergone gender reassignment, even though they have not.

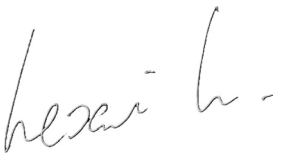
5. Training

The Company includes information on the protection that the Equality Act 2010 provides to individuals who are undergoing or have undergone gender reassignment in its training on equal opportunities and equality awareness training which is provided to all employees.

Approval & Review

This policy has been approved on behalf of the Directors:

Elizabeth Amos-Milburn	**Alexandra Gager-Liebhart**

Co-Director	*Co-Director*
	

Date of approval: 5th March 2026
Next review: 5th March 2027

Schedule 1 — Record of Changes

Version	Date	Nature of Change
001	5th March 2026	Initial published version included in the Combined Policies and Procedures 2026 edition.