

Authentic Equity Alliance

Questions

1 Do you have any comments on the proposal that applicants must live in their acquired gender for at least 3 months before applying for a GRC?

Yes

If yes, please outline these comments.:

The change from birth-sex to legal designation as the opposite sex is a momentous step for an individual to take, a decision which also has societal impact. That change should not be undertaken lightly, nor should the process be simplified. The current requirement, that an individual present as the opposite sex for two years prior to being granted a GRC, has inbuilt safeguards and should be retained.

2 Do you have any comments on the proposal that applicants must go through a period of reflection for at least 3 months before obtaining a GRC?

Yes

If yes, please outline these comments.:

A period of 3mths reflection is insufficient. Individuals, who often have comorbidities, should have time to reflect on such a momentous decision, with the sympathetic help and assistance of health and other professionals. The current two-year waiting period should be retained.

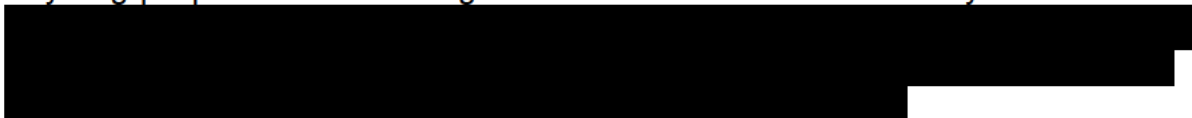
3 Should the minimum age at which a person can apply for legal gender recognition be reduced from 18 to 16?

Yes

If you wish, please give reasons for your view.:

The age limit should not be reduced. As is now commonly known, it is predominantly adolescent females that go down the transition path. To allow them to do so at an even younger age, and thus reduce even further the opportunity for them to first explore the bodily issues that most female adolescents experience, whether trans identifying or not, would be irresponsible.

The emergence of the 'Detransition Advocacy Network', and other groups, are collectively in contact with many hundreds of young people, predominantly female, who have regretted their decision to transition. That is incontestable evidence that the age limit should not be reduced. If the age-limit were to be reduced, the numbers of young people marooned in regret with mutilated bodies would only increase.



It would be utterly irresponsible for the Scottish govt to reduce the age limit. It would also be politically foolhardy for the Scottish govt to introduce such a change

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

Yes

If yes, please outline these comments.:

In its statements, the Scottish Govt has clearly failed to recognise the interplay between the 2004 Gender Recognition Act 2004 (GRA2004) and the 2010 Equality Act (EA2010) in relation to the EA2010 single-sex exception, and resultant impact on females.

As a direct result of misguidance on the EA2010 single-sex exception from the Equality and Human Rights Commission and, to a lesser extent, the Government Equalities Office – both now subject to official complaint by the organisation Authentic Equity Alliance – we already see, in contravention of existing law, the increasing spread of mixed-sex spaces and services, to the great dismay and distress of females. As a result, single-sex spaces and services (predominantly female-only) are now the loci of conflict.

Relaxation of the current requirements for obtaining a GRC would set the bar so low that any man could easily declare himself to be a woman. This would effectively nullify the EA2010 single-sex exception, to the disadvantage of females. There needs to be a thorough and honest review of this inherent conflict of interests. If the Scottish govt goes ahead with proposed changes, it would not only exacerbate current conflict but would be further demonstration of the govt's lack of responsibility.

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

Yes

If yes, please outline these comments.:

The lack of an equality impact assessment of the proposed reforms on women and girls is a glaring omission and wholly unacceptable.