

## **African Caribbean Christian Fellowship, Aberdeen Branch.**

### **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.:**

\*This amounts to changing gender by self-declaration. Applicants are not required to provide evidence to prove how long they have lived in their "acquired gender".

\* Sex will become a matter of personal choice and be entirely divorced from any biological or medical basis.

\* Vulnerable girls and women would be placed at risk as they could be prevented from challenging men using women-only spaces.

\* Ending the involvement of doctors risks leaving those transitioning without medical support.

**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.:**

\* As much time as possible should be provided for people to reflect because this is a life-changing decision. Three months is nowhere near enough for proper reflection on this kind of decision.

\* Regret usually takes years to emerge.

\* The route out of transition must be open for as long as possible.

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

No

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

\* This is too great a decision for a 16 year old who is only a child, to make. At 16 a person hardly knows who they are. If anything the age should be increased to at least 21.

\* The United Nations Convention on the rights of the Child defines children as those under 18 years of age. Given the rapid developmental changes and the extent of social pressure experienced by 16 & 17 year old children, it would be inappropriate to allow them to commit to such a radical course of action, particularly if required to sign a declaration that they do so for life.

\* A typical example is that of [REDACTED]

\* The Scottish Sentencing Council looked into brain development in young people and stated that its findings "confirm that the adolescent brain continues to develop into adulthood and does not reach full maturity until approximately 25 - 30 years of age."

\* Children require special protection and it would be irresponsible to allow changes in gender to be recorded before adulthood.

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

Yes

**If yes, please outline these comments.:**

\* Removing the protections and safeguards which exist in current legislation would expose both individuals and the wider society to risk of harm. In particular it could endanger vulnerable women and girls who could be prevented from challenging men using women only spaces.

\* it is very unlikely that any gain in terms of convenience and time-saving outweighs the potential problems inherent in the Scottish Government's proposed approach.

\* Serious consideration should be given to increasing the age at which a person is considered to be mature to make such a drastic decision.

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

Yes

**If yes, please outline these comments.:**

\* The Draft Impact Assessments say that "false declarations" could attract an unlimited fine and up to two years imprisonment. These should not apply to those who wish to revoke a Gender Recognition Certificate.

\* A Survey quoted in the draft assessments shows that of those giving reasons for not trying to change their legal gender, 35% of males and 51 % of females said they "did not meet the current requirements". This means that many potential applicants may not have gender confusion in the eyes of the medical profession.