

Scottish Women's Aid

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.:

Scottish Women's Aid (SWA) is the lead organisation in Scotland working towards the prevention of domestic abuse and plays a vital role in campaigning and lobbying for effective responses to domestic abuse. SWA is the umbrella organisation for 36 local Women's Aid organisations across Scotland; they provide practical and emotional support to women, children and young people who experience domestic abuse.

The services offered by our members include crisis intervention, advocacy, counselling, outreach and follow-on support and temporary refuge accommodation. Women's Aid are specialist services that work with a gendered analysis of domestic abuse, viewing women's inequality as cause and consequence of violence against women. This is embedded in Equally Safe, the Scottish Government's strategy on violence against women and girls which makes an explicit commitment to addressing gender inequality as a significant route towards preventing and eradicating violence against women and girls.

For nearly 50 years the Women's Aid movement in Scotland has maintained a radical focus on women's and children's experiences of oppression and abuse--and the everyday courage they demonstrate--as the foundation for every decision we make and every campaign we undertake. We are the experts in our field, just as women and children are the experts in their own lives. No system is perfect, but no one is better placed to make the at-the-coalface decisions about how best to serve women and children experiencing domestic abuse than our staff. We support and affirm the wisdom and experience of the Women's Aid teams making expert, professional and compassionate judgments about how to deliver support to all women and children. Any policy or practice that diminishes the capacity of services to make these judgments would be a mistake and would be detrimental to the services delivered by Women's Aid and therefore to the women and children we serve.

SWA responded to the first GRA consultation after a wide-ranging process of information gathering, including a survey of our services, a review of available evidence, and discussion with our colleagues in sister organisations. The discussions that followed the first consultation have encouraged further (and healthy, in our view) reflection on inclusion in our network, and we will continue to talk, think, and write about how to best to respond to the needs of women and children experiencing domestic abuse. We have not, however, encountered any evidence or information that has caused us to shift from the principles defined in our original response, and so we refer the government to that submission, found here: <https://womensaid.scot/wp-content/uploads/2018/05/SWA-Consultation-response-Review-of-the-Gender-Recognition-Act-2004.pdf>

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?

No

If yes, please outline these comments.:

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.:

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

No

If yes, please outline these comments.:

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

No

If yes, please outline these comments.: