



Trans Equality

Policy This policy sets out the Bank’s expectations for supporting all trans, non-binary and gender-fluid employees.

Why do we need this policy?

The Bank is committed to providing an inclusive and welcoming community where employees are enabled to meet their full potential and are treated as individuals. This policy’s focus is:

- providing support for and understanding of those individuals who wish to take, or have taken, steps to present themselves in a gender different to the one they were assigned at birth;
- ensuring the wellbeing, safety and security of trans, non-binary and/or gender-fluid employees; and
- Setting expectations for all employees on how to approach gender identity considerations in a respectful manner.

You can read the Bank’s supporting guidance (Trans Equality and Transitioning at Work Guidance) for this policy [here](#).

Please also see the Bank’s separate [policy](#) in relation to transitioning at work.

This policy does not form part of any contract of employment or have contractual effect; the Bank therefore reserves the right to amend, replace or withdraw this policy from time to time.

Who does this policy apply to?

This policy covers staff (including employees, officers, consultants, contractors, interns, volunteers, casual workers and agency workers) and also third parties such as customers, suppliers or visitors to the Bank’s premises.

This policy applies to staff on Bank premises and equally outside of the workplace, such as on business trips, while working from home, at work-related events or when socialising with other members of staff.



Please contact the [P&C Inclusion Team](#) if you require further information or support.



What you must know or do?

What does it mean to be trans?

“Trans” is an umbrella term used to describe people whose gender identity or expression is not the same as, or does not sit comfortably with, the sex they were assigned at birth. “Non-binary” is an umbrella term for gender identities outside of the male/female gender binary. “Gender fluid” is a term used by people who do not identify as having a fixed gender.

Trans people may describe themselves using one or more of a wide variety of terms, a full list of useful terminology is available in section 5 of the Trans Equality and Transitioning at Work Guidance.

What is Transphobia?

A non-exhaustive list of behaviours which are considered transphobia include:

- Speculating about someone’s gender – “Is that a man or a woman?”
- Disclosure of someone’s trans history without a legitimate reason - “He used to be a woman”
- Dead-naming – use of the birth name or other former name of a transgender or non-binary person without their consent
- Misgendering – Purposefully, persistently and intentionally using an incorrect pronoun
- Inappropriate questions about medical history or treatment
- Words or actions that deter trans, non-binary or gender-fluid individuals from using the Bank facilities of their choice or amount to harassment.

Key Principles

- The Bank seeks to treat employees fairly and consistently regardless of their gender identity.
- The Bank will provide a supportive environment for employees who wish their trans status to be known.
- Transphobic abuse, bullying or harassment will not be tolerated and will be dealt with under the Bank’s [anti-bullying and harassment policy](#).
- The Bank seeks to provide appropriate facilities so that trans, non-binary and gender fluid employees have access to the facilities that they feel most comfortable using (gender neutral or otherwise) on Bank premises.
- Employees should feel able to dress however they feel most comfortable at work in line with expectations around business dress in their local area and any health and safety requirements. The Bank will seek to make uniforms available, if required, to suit all gender identities.

- The application of this policy will be accordance with the relevant data protection legislation. For information on how the Bank processes your data, please see [our staff data privacy notice](#).

For all employees

All employees have a role to play in creating an inclusive working environment for trans, non-binary and gender fluid employees.



- 1. You must be respectful and thoughtful in your behaviour towards trans, non-binary and gender fluid employees including questions relating to gender identity.**

This means:

- 1.1. Reporting any instances of transphobia, discrimination or harassment towards individuals to a manager or [Employee Relations](#).
- 1.2. Respecting the individual's privacy and not speaking to others about a person's trans status.
- 1.3. Respecting the individual's right to use the bathroom facilities they feel most comfortable using.

For all managers

Managers play an important role in ensuring trans and non-binary employees feel supported.



- 2. You must ensure that trans and non-binary employees are full supported at work.**

This means:

- 2.1. Ensuring that all employees are able to dress however they feel most comfortable, in line with expectations in the local area. This includes ensuring the option that uniforms can be gender neutral.
- 2.2. Having due regard to issues of confidentiality concerning any information that is shared by the individual.
- 2.3. Challenging any non-inclusive behaviour to or about the individual.
- 2.4. Being guided in your actions and communications by the individual. For more information on what this entails, see [the related guidance](#).

What support is available?

We have a confidential [Employee Assistance Programme](#) who can provide support and guidance, or our [in-house counselling team](#) are available to discuss any concerns you have.



The LGBT+ & Allies network steering group has buddies who are happy to support and answer any queries, [email](#) for details.

Alternatively, you may find the following websites useful:

- www.Stonewall.co.uk
- www.gires.org.uk
- www.gendertrust.org.uk

What is the impact of non-compliance?

If you realise you have breached – or suspect that you might have breached – a requirement in this policy please tell your line manager as quickly as possible, so that the issue can be reported and redressed under the Bank’s [Breach Management Policy](#). The Bank gives credit for you taking prompt responsibility for your mistakes. You should be aware that failing to discharge your responsibilities could lead to disciplinary or other action.

Governance

Any substantive changes to this policy should first be endorsed by the Compliance Division and then pass through all appropriate levels of Bank governance.

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Policy Approver:	Executive Director, People and Culture
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