



THE UNIVERSITY *of* EDINBURGH

Trans Policy (Students) Equality Impact Assessment – February 2025

A. Key Information	
Policy/practice name:	Trans Policy (Students)
General background/aims of policy:	The Trans Policy (Students) is a policy created from the review of the previous Trans Equality Policy. In that review the decision was taken to split it into two policies, one for Staff and one for Students.
School/Dept:	Student Experience Services
Assessed by: (name & job title)	Rebecca Shade Senior Policy & Projects Adviser, Students
Sign off by: (name & job title)	Lucy Evans Deputy Secretary, Students
Sign off date:	February 2025
Review date:	February 2026

B. Reason for EqIA	(check one)
New policy/ practice is proposed	<input type="checkbox"/>
Change to existing policy/practice is proposed	<input checked="" type="checkbox"/>
Other (describe in Section D below)	<input type="checkbox"/>

C. Who will be most impacted by this proposal?					
Age	<input type="checkbox"/>	Race (including ethnicity and nationality)	<input type="checkbox"/>	Marriage and civil partnership ¹	<input type="checkbox"/>
Disability	<input type="checkbox"/>	Religion or belief (including no religion or belief)	<input checked="" type="checkbox"/>	Sex	<input checked="" type="checkbox"/>
Gender reassignment	<input checked="" type="checkbox"/>	Pregnancy and maternity	<input type="checkbox"/>	Sexual orientation	<input type="checkbox"/>
Other characteristics	<input type="checkbox"/>				

D. Consideration of Impact
<p>There is no expected impact on the characteristics of Age, Disability, Race, Pregnancy and Maternity, or Sexual Orientation. This policy seeks to very directly address the experience of trans students, and as such, makes no direct or indirect impact on the experience of students with these other characteristics. Consideration of the impact of the policy on the characteristics of, gender reassignment, sex and religion or belief are set out below.</p> <p>Gender Reassignment</p> <p>In relation to Gender Reassignment, the expected outcome is for a positive impact on people who are protected under this characteristic, as well as more broadly within the trans community.</p> <p>It has been established that data relating to student's trans status is collected in the student record, but students can choose the option of 'prefer not to say'. This means that there is no definitive data currently for the number of trans students within the student population.</p> <p>The updated policy covers multiple additional areas of student experience which are not covered within the current policy. This gives trans students and those supporting them,</p>

¹ Note: only the duty to eliminate discrimination applied to marriage and civil partnership. There is no need to have regard to advancing equality or opportunity or fostering good relations in this respect.

much clearer signposting, processes and expectations in relation to their full student journey. Examples of sections include: Application and Pre-Arrival (S7), Identification (S9), Interrupting Study (14) and Student Finance (S16).

Areas of the University have been consulted to ensure policy wording is accurate, maps against current process and is sustainable.

Careful consideration and advice have been taken on the expanded wording on facilities use (S8). This section now provides greater clarity to the University community on the use of facilities across our wide and varied estate.

Consultation with trans students has highlighted that the new policy is clear and supportive through its simple articulation on what is available to (trans) students. There have been concerns on issues of transphobia on campus and how students can report through the Dignity & Respect policy. It is expected that these concerns will be addressed in the upcoming review of Dignity & Respect.

The policy is accompanied by new 'Quick Guides' for trans students and staff, and those supporting them, which have also been welcomed.

Religion or Belief

In relation to Religion or Belief. There is an **expected neutral impact**, with a potential **negative impact** on people with religious observances of modesty and propriety, who may have concerns about sharing facilities with others on the basis of their legal, or considered, sex or gender identity.

The University recognises that, as a matter of law, access to facilities on the basis of gender identity makes those facilities mixed-sex rather than single sex facilities. We mitigate this risk by providing single occupancy toilet facilities throughout our estate, alongside more open and/or mixed options.

In accordance with the Equality Act 2010, we will provide separate or single-sex facilities where this is a proportionate means of achieving a legitimate aim. We will also provide single-sex (not mixed-sex) facilities where required under applicable law. Guidance will be available to the community where required.

There is an **expected neutral impact**, with the potential for a **perceived negative impact**, for those who hold protected beliefs but are expected under the terms of this policy to use a student's pronouns. Misgendering can amount to harassment under the Equality Act 2010 and the University considers it has a legitimate aim in avoiding creating a hostile environment for students with the protected characteristic of gender reassignment.

Where students and staff wish, they are also free to use names rather than refer to people in a manner requiring the use of pronouns. The use of pronouns in terms of the policy cannot and should not be assumed to be indicative of any particular individual's beliefs in relation to issues of sex and gender. The statement of a student or staff member's own pronouns will always remain an individual choice.

Sex

In relation to Sex. There is an **expected neutral impact**, with a **potential negative impact**, on people who have privacy or safety concerns about sharing certain facilities with someone of the opposite sex, where these facilities are provided on a mixed sex basis and that this may discourage them from using such facilities.

The University recognises that, as a matter of law, access to facilities on the basis of gender identity makes those facilities mixed-sex rather than single sex facilities. However, the University also recognises that a policy requiring people to use *only* the facilities which accord with their biological sex in any and all cases risks discrimination in respect of students with the protected characteristic of gender reassignment.

We mitigate this risk by providing single occupancy facilities throughout our estate where possible, alongside more open and/or mixed options. In accordance with the Equality Act 2010, we will provide separate or single-sex facilities where this is a proportionate means of achieving a legitimate aim. We will also provide single-sex (not mixed-sex) facilities where required under applicable law. Guidance will be available to the community where required.

Summary

The policy is expected to have a **positive** or **neutral impact** on students through providing greater clarity on current processes and procedures, but not materially changing them. For both *sex* and *religion or belief* we do not anticipate significant negative impacts, but we will work collaboratively to ensure communication and ongoing engagement works to negate any real or perceived impact.

E. Equality Impact Assessment Outcome Select one of the four options below to indicate how the development/review of the policy/practice will be progressed and state the rationale for the decision.	(check one)
Outcome 1: No change required – the assessment is that the policy is robust.	<input checked="" type="checkbox"/>
Outcome 2: Adjust the policy or practice – this involves taking steps to remove any barriers, to better advance equality and/or to foster good relations.	<input type="checkbox"/>
Outcome 3: Continue the policy or practice despite the potential for adverse impact, and which can be justified.	<input type="checkbox"/>
Outcome 4: Stop the policy or practice as there are adverse effects which cannot be prevented/mitigated/or justified.	<input type="checkbox"/>

F. Action and Monitoring

We will continue to work closely with the Student's Association and Sports Union and their associated officers, the Staff Pride Network in relation to PGR students and more widely to collaborate with trans students on the impact and application of the policy.

We also acknowledge the EDI Committee, and its Sub-Committees, will bring forward student voice on the impact of the Policy from our communities.

All SES policies are reviewed as part of a regular review cycle, monitoring their use and compliance.

G. Publish

Send your completed EqIA to the HR EDI team (equalitydiversity@ed.ac.uk) to published, and keep a copy for your own records.