

Question 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 - The NHS say diagnosis of gender dysphoria is made from an in-depth assessment carried out by two or more specialists over a period of time, which takes longer than 3 months to complete thoroughly. The reforms would dramatically speed up the process of applying for a legal sex change, as well as removing all forms of gate-keeping designed to prevent abuse of a system that was originally intended to help a very small number of people with a rare medical condition. **Self-declaration of sex is not a principle that should be embedded in law and the Bill should be rejected in full.**

Question 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 - The current thorough medical process should be retained to ensure a person considers the full ramifications before signing any legal documents. The reforms would dramatically speed up the process of applying for a legal sex change, as well as removing all forms of gate-keeping designed to prevent abuse of a system that was originally intended to help a very small number of people with a rare medical condition. **Self-declaration of sex is not a principle that should be embedded in law and the Bill should be rejected in full.**

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

NO - Young people who wish to be the opposite sex are frequently placed on an experimental medical pathway which leads to loss of sexual function, infertility, and lifelong medication. Current research shows that, for the vast majority of children, these feelings of gender dysphoria resolve with maturity. The causes for both the rapid increase in children seeking medical help and detransitioners (those who return to their original sex having been through the medical route) needs to be investigated before any law change extends the right to legally change sex to young people.

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

YES - The Bill should be rejected in its entirety as the consultation paper (section 2.13) states our current legislation fully meets European law and there is no requirement for it to be reformed. There is absolutely no justification for allowing someone to switch the sex on their birth certificate without a medical diagnosis of gender dysphoria. Only people with this rare medical condition and who have been through a sincere, professionally monitored medical process should continue to have this right. The Government has failed to take into account the consequences of changing the meaning of 'man' and 'woman' from a biological definition to one based on a self-declared feeling. There is plenty of evidence that taking this stance has already been detrimental to women's and children's rights.

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

YES - The Impact Assessments are not fit for purpose. They do not follow the Scottish Government's own standards of looking at the possible consequences of any law or policy change, and incorrectly state this Bill will have no adverse impact on the female sex. They are not thorough, comprehensive or evidence-based.