



Trans+ and
Non-Binary
Inclusion
Policy Creation
Guidance 2025



Foreword:

It's been almost a quarter of century since I transitioned. I was fortunate; I had a tremendous ally, a supportive and sympathetic HR Manager and a good team of colleagues. Also, both the HR Manager and my line Manager had some experience of gender non-conforming people previously, so they were equipped to provide the incredible workplace support I received before, during and post transition. Those people had no guide to follow, no manual, but through a combination of their experience, professionalism and kindness, my workplace transition was a success and twenty-five years later, I'm still in the market.

"I was very lucky."

In the intervening years, people have become more aware of Gender non-conformity, for better and for worse, and many large companies have compiled a guide to Transition in the workplace or some kind or other. If you have, brilliant, but this might help you with any revisions or updates you may make.

However, the market is still comprised mainly of a cluster of smaller businesses, who when confronted with an individual who expresses an intention to transition, may find themselves scratching their heads and wondering what to do next. If that's you, then this guide is for you!

This guide has been carefully compiled through the LINK network by a number of Gender non-conforming professionals and their allies, all who work in the market, in collaboration with Global Butterflies, who produced the Lloyds's Trans and Non-Binary guide over half a decade ago. It is designed to provide practical guidance to businesses in supporting their employees, not only those that transition, but those who work alongside them. There are also details of organisations that may provide additional support and advice in the appendices should you require it.

It's my belief that using the advice and guidance in this guide will help you provide the appropriate workplace support to your colleagues and in doing so, will encourage them to stay in your business and the wider market.

After all, that's how I'm still here...

Rebecca Mason

First Transwoman in Lloyds
February 2025.

Table of Contents:

PART 1: INTRODUCTION AND PURPOSE

- 1. Introduction 4
- 2. Why have Trans+ and Non-Binary Policies in the Workplace? Testimonials from Role Models 4
- 3. Terminology 5
- 4. The Purpose of This Guide 5

PART 2: POLICY CREATION GUIDELINES

- 1. Draft Table of Contents for Your Policy 6

PART 3: CHECKLISTS AND GUIDELINES

- 1. Action Areas 8
- 2. Guidelines 10
- 3. Checklists 11-12

PART 4: CONTACT DETAILS 13

PART 5: HELPFUL RESOURCES AND APPENDIX 14

Part 1: Introduction and Purpose

1. INTRODUCTION – ABOUT THIS GUIDE AND HOW TO USE IT

Welcome to this guide.

We at the Link Trans+ and Non-Binary Group have put this guide together to help smaller and less well-resourced companies in the UK insurance market and wider ecosphere to put together trans+ and non-binary inclusion policies for employees.

If you're reading this, you know it's a legal requirement to protect trans+ and non-binary people. You're looking to draft suitable workplace policies to help ensure this protection, or to check your existing policies against a set of robust guidelines. On our side, we hope to help make this process smoother for you while also ensuring a minimum standard of policy level across the market for our trans+ and non-binary colleagues.

We have designed this mainly for the use of HR professionals and leaders at these companies, as well as the heads of employee resource groups, though we hope this is also useful to trans+ and non-binary employees in supporting them through what can be very difficult and uncertain times.

Use this guide as a checklist against current policies to ensure they are robust and promote the safety and inclusion of all trans+ and non-binary employees.

At times, this document may come across as legalistic. This is a reflection of how seriously we take the issue and to help you take it seriously too. But we are also trying to help. So if you have any questions after reading this, please do reach out to us: transenby@lgbtinsurancenetwork.com

There is a lot to take in with this guide. So we suggest reading it at least twice. First to get familiar with the overall guidance and things you need to consider. Second, focus more slowly on the parts most relevant to you, perhaps taking notes. Then maybe read it a third time to make sure you understand everything clearly and haven't missed anything important.

With that said, happy reading – and good luck with your trans+ and non-binary policies.

2. WHY HAVE TRANS+ AND NON-BINARY POLICIES IN THE WORKPLACE? TESTIMONIALS FROM TRANS+ ROLE MODELS

Archer Ahern

Foundation CIPD (He/they)

“My hope is this document helps the next person who is transitioning, or the manger, friend, or family member.

Transitioning is so personal, it's different for everyone, and looks different depending on where you live, the access to healthcare you have, and your family and friends' reaction. This policy should help bring clarity on what the process in your workplace looks like, what steps need to happen, and help bring all the pieces together, so no matter how fast or slow the transition is, everything is under control.”



Amanda Hilton

LLB (Hons) FCILEx

*“You don’t realise when you transition how much needs to be done. Many systems and documents need updating and a lot concurrently. **Most important though is both you and your employer working together on this.** Few are experts in this field and a transitioning plan was essential for me. It brought together HR, board members, senior management, local management and my team internally and my regulator and clients externally. We all knew what was needed, how it was needed, and it really encouraged a collaborative approach. It also became an education tool for future colleagues and a sign post for those struggling with their gender identity.”*

3. TERMINOLOGY

We’re using the term “trans+” as an umbrella term for all gender divergent individuals to help keep this guide short and clear. We appreciate there are many terms including nonbinary, gender fluid, agender etc, and we understand that this list is not exhaustive or mutually exclusive.

More detailed terms can be found in Part 5: Helpful Resources and Appendix (Page 15)

4. THE PURPOSE OF THIS GUIDE

The Link Trans+ and Non-Binary Group created this document to ensure that trans+ and nonbinary policies across insurance sector are:

- Appropriate
- Supportive
- Comprehensive
- Consistent

Part 2: **Policy Creation Guidelines**

A. DRAFT TABLE OF CONTENTS FOR YOUR POLICY

Each of the following sections that should be used within the Table of Contents for your policy has a short amount of text explaining the background and what Link expects to appear within the final policy.

1. Diversity statement / introduction (Why you support trans+ and non-binary employees)

2. Who the policy applies to

We recommend that this policy applies to all employees, clients, consultants, contractors, and agency workers.

Add a line to ensure all employees read the entire policy before reading specific sections relation to them (i.e. manager, individual transitioning, ally).

3. Links to other policies (DE&I Policy)

4. Definitions: what does transitioning mean (or change of gender expression; not all trans+ people transition). (see Part 5 appendix of Helpful Resources and Definitions)

5. Managing conflicting beliefs / non-compliance

Workplaces are diverse, with a wide range of beliefs and identities, which should all be respected. This can be difficult when these beliefs conflict.

Employees are allowed to hold conflicting beliefs; however, they cannot act in a way that discriminates or harasses another employee on the basis of their beliefs, such as purposeful and repetitive deadnaming (see glossary), use of incorrect pronouns, or preventing access to certain facilities. All employees should raise any behaviours that are discriminatory or harassment to their manager or HR business partner, who can help them navigate next steps.

We advise HR professionals to consider certain cases outlined in Part 5, page 15 (see Forstarter v CGD Europe, see DWP vs Dr. Mackereth, see Taylor v Jaguar/Land Rover) and focus on behaviour arising from belief rather than the actual belief itself.

6. Checklists (draft included below)

General Transition / Change of Gender Expression Checklist (below)

7. Guidelines (draft included below)

Guidance and Checklists for Managers (see below table)

Guidance and Checklists for Employees (see below table)

8. HR

Recruitment guidelines

Creating a welcoming interview process.

- Gender identity should never be assumed within a hiring process.
- This is a great opportunity for the company to highlight their inclusive practices such as pronouns usage across the company and to showcase all-inclusive benefits that they may offer, not exclusively trans+ inclusive healthcare.

Protecting candidate and employee privacy.

- This could include sensitivity around data handling. Documentation they are asked to provide for a job may not match their current gender identity or name and HR functions should be trained to deal with such documentation sensitively and correctly.
- Where a criminal records check is required for a role, candidates are offered the option of using the Disclosure and Barring Service's sensitive applications route, which provides a confidential check for trans+ applicants.

Promotions and regulated roles

- The same protections for employees should be adhered to when an employee moves into or is promoted into a regulated role or directorship. In some instances, HR should work with the individual if they are going into a regulated role.

9. Dress Code

This should be adapted to each organisation's dress code

- e.g. 'Employees are welcome to wear the clothes associated with whichever gender they identify with as long as they adhere to the dress code. Our dress code at [company] is...'

All employees should be able to wear whichever aspect of the uniform that they feel comfortable with.

Supporting comments could include, 'If you need further clarification, please reach out to your HR business partner or representative.'

10. Facilities

We recommend inputting a line similar to: 'Employees should use the facilities that are in line with their gender identity and should not be compelled to use accessible toilets if they do not wish to do so.'

You do not need a Gender Recognition Certificate (GRC), or to have started to medically transition to start using the facilities that best match your identity. This should be highlighted within the policy.

11. Appendix

Terminology

Further Resources

(examples of these can be found in Part 5, page 15)



Part 3: Checklists and Guidelines

The organisation should consider how much evidence they require from the individual to affirm their gender identity.

Consider if and what legal services the business can provide to the individual to assist with their transition. This could include assistance with deed polls/ statutory declarations, name changes, etc.

- Proof of legal name change. Note: Due to the direct link between an HR system and government records (e.g. pension, insurance), some HR records may only be updated upon completion of the legal name change.
- There may be a gap between deed poll arrival and processing – is there an issue on this at that stage. (Regulatory? Internal?) An original deed poll might be required by some whilst others require certified copies. The former can also delay matters.
- Also considering Statutory Declarations (unenrolled deed polls) – ensuring they are accepted by HR and other providers. Will the HR team be helping complete a name change with their benefits provider? What is that system?

1. ACTION AREAS

Below is a draft Action Area plan for the company to use if an employee transitions:

Action Area	Action	Please identify the person in your organisation who is responsible for these changes:
Systems to Update (please us as a guide, it is not exhaustive):	<i>We have entered some examples here; these will differ between organisations:</i>	
Door Sign	<i>Replace door signs for office</i>	<i>Facilities</i>
Business Cards	<i>Update name and emails on Business Cards</i>	<i>Reception / HR</i>
Emails	<i>Change name within email account</i>	<i>IT</i>
Outlook Diary	<i>Change name for Outlook Diary</i>	<i>IT</i>
Telephone Directory	<i>Change name within telephone Directory</i>	<i>IT / Reception</i>
Switchboard	<i>Change name for internal phone switchboard</i>	<i>IT / Reception</i>
Security Pass/Photo	<i>Update Security Pass/Photo</i>	<i>Facilities</i>
Lloyd's Pass	<i>Update Lloyd's Pass</i>	<i>Compliance/CoSec</i>
SM&CR (if applicable) and regulator changes	<i>Update SM&CR (if applicable) and regulator changes</i>	<i>Compliance</i>
Intranet	<i>Change name reference on internal Intranet</i>	<i>IT</i>
HR Systems	<i>Update all HR Systems</i>	<i>HR</i>
HMRC / NI	<i>Update HMRC / NI of name change</i>	<i>HR</i>
Pension	<i>Update name with Pension provider</i>	<i>HR</i>
Health Insurance	<i>Notify health insurers of name/gender changes</i>	<i>HR</i>
Computer Back Ups	<i>Update computer back Ups</i>	<i>IT</i>
Professional Photo	<i>Have new professional photo taken</i>	<i>Facilities</i>

COMMUNICATION PLAN

Potential questions to be used within the Action Area column:

What do you want to tell the team/clients about your transition? Work may not always be the first to know.

When do you wish to tell individuals about your transition?

What do you want to tell clients about your transition? Utilise your networks of allies to inform people on your behalf, if possible.

Who will inform the team/ clients about your transition?

How will they be informed? (This must be led by the individual who is transitioning)

Do you wish for any trans+ inclusion awareness training to take place for your team? If not then we suggest the company has resources available – more can be found in Part 5 below.

What will be your new title/ pronouns and name? Do your company systems cope with all variables?

When would you like to start using your new title, pronouns and name?

What systems, records and documentation will need to be changed (e.g. HR system, security passes, Teams Profile etc)? Please use the list above as a start for these considerations.

Which gendered facilities would you like to use? Are there gender neutral facilities available? Are there gender neutral showers/changing areas for the building?

At this time are there any key dates you would like to share with your manager/ HR?

Do you have any medical appointments that you need time off for? If so, what are the frequency of these appointments?

Does your HR policy consider gender reassignment surgery or any gender treatment as elective? Generally Gender Reassignment Surgery (GRS) etc should not be considered elective surgery but this stance should be made clear by the company.

Does this affect entitlements / payroll issues?

Does any private medical provider cover this?

If you are taking medication, are there any possible side effects? Transitioning is not necessarily accompanied by medical changes.

Transitioning can be very emotionally straining and reasonable accommodations should be taken for the individuals that do not just concern medical or surgery leave.

Do you have any other concerns at the present time which may impact your wellbeing during transition?

Does the company have an HR subject matter expert in this field that can be utilised?

Can the company offer any other support or reasonable adjustments for the individual who is transitioning?



2. GUIDELINES

These can be included within your policy:

GUIDELINES FOR MANAGERS

Support from leaders is critical and it is their duty to maintain the employee's privacy, protect their dignity, ensure their safety, and demand the same of others. Leaders need to lead by example and be aware of how their actions may have an impact on the outcome of the transition. Leaders are not expected to be experts on trans+ issues or to have all the answers, but they should listen and be attentive to their employees and be open to learn how to best support someone through transition.

It is important to start using the employee's new name and pronouns as soon as requested. This is a good way to show support. Keep in mind that it could also be considered harassment if no attempt is being made to adapt. Leaders need to show leadership in ensuring that the employee is always referred to by their correct name and correct pronouns and interrupt inappropriate/hurtful language when they hear it. For example, leaders should make sure that their teams know that using the word 'it' to refer to a trans+ person is disrespectful and dehumanising.

GUIDELINE FOR EVERYONE

If you know, or learn, that someone has transitioned in the past, you have no right to disclose this to anyone or to ask the individual employee about it. It is past. If at some point you are confused by or struggling with someone's physical/personal appearance or style as they transition, please direct your concerns to HR. Remember that transitioning requires a lot of courage, so be respectful, compassionate, and empathetic.

GUIDELINE FOR ALLIES

Generally, being an ally for trans+ people involves proactively speaking up for equality and reactively speaking out against transphobia. Being an ally for someone who is transitioning could involve learning more about the process and being there emotionally and in person for an individual who is transitioning as they settle into their new gender identity within the workplace.

Essentially becoming a transition buddy could involve the following allyship attributes:

- Do the research
- Research current socio-political matters (from trusted sources) for trans+ people of all ages
- Be prepared to answer questions from colleagues who want to understand more about Trans+ issues and challenges
- Turn up and be present
- Regularly check in with individual who is transitioning. What is going well or could be improved upon?
- Perhaps the individual might want to be accompanied into the office
- The first day can often be the scariest. Make sure the person transitioning is comfortable

3. CHECKLISTS

MANAGER CHECKLIST

This checklist provides you with key elements that must be addressed when engaging with an employee about their intention to transition. However, remember that your interaction with your employee should feel inclusive, warm and genuine, and more than a set of tasks.

- ✓ Acknowledge how difficult the decision to talk to you must have been.
- ✓ Reassure them that you will maintain confidentiality and do so, and confirm you won't speak to any third party without their permission.
- ✓ Let them know you are there to help, and that you need their input on what will be most helpful to them, and when that help is best provided.
- ✓ Ask them when/if they want to tell their leader/HR business partner or representative or if they want you to and if so, whether they want you there as support.
- ✓ Talk to them about the timing for this process—when to start, and what pace and cadence they would like.
- ✓ Ask them if they expect to change their name and/or pronouns. If so, learn their new name and ask them when they want you to begin referring to them by their new name and/or pronouns.
- ✓ Ask if they anticipate needing time off for consultations and treatment, and if they can give an indication of when and for how long it might be. Make sure they know that normal leave provisions will apply. However this may need changing if your organisation has extra allowance for transition related sick leave.
- ✓ Ask them if they have reached out to your benefits provider to better understand what is covered under the plan. If not, ask if they need information on who to contact if they have questions.
- ✓ Remind them of any employee assistance programme (if available) and provide them with the contact details of the programme.
- ✓ Ask about their needs regarding toilets, and ensure they know they have your support in using the facilities consistent with their gender identity.
- ✓ Ask them if they have any specific concerns about their current work environment/team/leader.
- ✓ Follow up on anything you have agreed to do.
- ✓ Contact HR advice team, if necessary, as a source of first line telephone support.
- ✓ Check in with the employee regularly. Adjust the plan if needed, based on the employee's feedback about how the process is going.



EMPLOYEE CHECKLISTS (IF YOU ARE AN EMPLOYEE WHO IS TRANSITIONING)

The decision to transition in the workplace takes courage. Your leader/HR business partner or representative may not know everything they need to know about transitioning, but they are there to support you. The following suggestions may help you to consider the approach that you want to take.

- ✓ Meet with a leader and/or your HR business partner or representative to begin the process. Choose someone with whom you are comfortable.
 - ✓ If you want, bring a friend.
 - ✓ Have you considered your current wellbeing?
 - ✓ Explain that you need a transition plan.
 - ✓ Outline your plans and how you want to see your transition evolve in the workplace.
 - ✓ Be as clear as you can be about your timelines.
 - ✓ Outline your concerns.
 - ✓ Tell them what your needs are.
 - ✓ Let them know what action you expect from them and outline what kind of support would be most helpful to you.
 - ✓ Let them know what they can expect from you in terms of changing gender expression (e.g. when you will begin dressing according to gender) and what your timing is for this.
 - ✓ Settle on a contact person from Executive, the internal Pride Network, and HR. Talk together about options if you encounter difficulties in your current job/location.
 - ✓ Go over any benefit/leave of absence questions you have.
 - ✓ You do not need to answer any intimate personal questions.
 - ✓ Let people know if they cross the line.
 - ✓ Reinforce your right to privacy and confidentiality.
 - ✓ Review the Manager Checklist section and show it to your manager if necessary.
- As you transition:**
- ✓ Contact your internal Pride Network or DE&I team. They can be a great source of support and provide you with additional resources.
 - ✓ The Link Trans+ and Non-Binary Group can offer support. And also provide additional resources.
 - ✓ Immediately identify any harassment/transphobia you are experiencing. It is critical that leaders and HR stop it before it snowballs.
 - ✓ Try to keep your focus on the job. Work out a strategy with your key contacts for getting some relief if things get difficult during the first few weeks.
 - ✓ Use your best judgement – you will need to be patient with people as they adjust to using your new name and gender, while at the same time recognising when someone is being wilfully ‘forgetful’.
 - ✓ People who transition describe a variety of emotions, from feeling liberated to feeling nervous or anxious. It is likely you will feel a range of emotions. Do not hesitate to reach out to the employee assistance programme for additional support.
 - ✓ **Expect respect. Your courage and dignity will be a model for others.**



Part 4: Contact Details

We hope that sections 2 and 3 help you to draft a solid and useful Trans+ and Non-Binary / Transitioning at Work policy.

Please use the sections as a guide, and reach out to us at Link if you have any questions or require any further clarification.

You can reach us at:

transenby@lgbtinsurancenetwork.com



Part 5: Helpful Resources and Appendix

The CIPD has a brilliant guide on Transgender and Non-Binary Inclusion at Work, including a list of employment tribunal and EAT cases.



Global Butterflies



Link



GIRES



ENEI



Stonewall



2019 Lloyd's guide to Trans inclusion



Gendered Intelligence



The Law Society's Glossary of Terms for Transitioning and Changes to Gender Expression



As you probably know, the Equality Act 2010 prohibits discrimination, for example in employment or the provision of public services, on the basis of protected characteristics. While “protected characteristics” include those trans+ people, it remains a fact that there are no specific or enforceable legal protections for those who identify as non-binary.

Therefore, it remains legally more complicated and nuanced to deal with resistance to support for non-binary employees, whether deliberate or otherwise. If you as an organisation find yourself facing a difficult situation, do not hesitate to call in Link or reach out to Global Butterflies for support and advice.

Link would also like to highlight the following cases which may be of use for companies:



Taylor vs Jaguar/Land Rover



Employment Appeal Tribunal case of Maya Forstater.



The Department for Work and Pensions vs David Mackereth

APPENDIX - TERMINOLOGY

The following definitions are often used when discussing issues relating to gender identity (though we recognise that these are not exhaustive or universal and that language changes):

- **Acquired gender** is a legal term referring to the gender in which a trans person is living and of which they can apply for legal recognition under the Gender Recognition Act 2004.
- **Affirmed gender** is generally the preferred term for a trans person's gender after transitioning.
- **Ally** A person who openly supports members of the lesbian, gay, bisexual, transgender questioning/queer, intersex (LGBTQI) or sometimes LGBTQ+ community. Typically heterosexual and/or cisgender.
- **Assigned gender** is the gender a person is assigned at birth based on physical attributes.
- **Assigned male at birth (AMAB)/assigned female at birth (AFAB)** Refers to the sex and legal gender assigned at birth and recorded on a child's birth certificate.
- **Binary** refers to the "one or the other" approach to gender where a person regards themselves as either male or female.
- **Cisgender** describes a person whose gender identity aligns with the gender they were assigned at birth.
- **Deadnaming** using someone's previous name of which they are no longer referred to.
- **Gender dysphoria** describes the strong, persistent discomfort or distress caused by the inconsistency between a person's self-identified gender and the gender they were assigned at birth.
- **Gender fluid** describes a person whose expression of gender may change from day to day.
- **Gender identity** is a person's identification of their gender, which could be binary, non-binary, fluid or neutral.
- **Gender neutral** describes a person who does not subscribe to the binary approach to gender.
- **Gender reassignment** is defined under the Equality Act 2010 as when a person is proposing to undergo, is undergoing or has undergone a process (or part of a process) for the purpose of reassigning the person's sex by changing physiological or other attributes of sex. No medical intervention or processes are required.
- **Intersex conditions** (also known as differences in sex development) are congenital anomalies of the reproductive system involving genes, hormones and reproductive organs. A gender is assigned to the person at birth which may differ from their gender identity in the future.
- **Misgendering** is referring to a person using a word, especially a pronoun or a form of address, which does not correctly reflect the gender with which they identify.
- **Non-binary** describes a person who does not subscribe to the binary approach to gender, and who may regard themselves as neither male nor female, or both male and female, or take another approach to gender entirely.
- **Trans+** an umbrella term for describing all trans and gender non-conforming individuals.
- **Transgender (trans)** describes a person whose gender identity does not match the gender they were assigned at birth. Trans is generally the preferred umbrella term rather than transsexual.
- **Transitioning** is where a trans person undergoes the process of aligning their social and physical identity to match their gender identity.
- **Transsexual** is defined under the Equality Act 2010 to mean a person who has the protected characteristic of gender reassignment. This term is no longer widely used in the UK.

Further terms can be found here:



**The Law Society's Glossary
of Terms for Transitioning and
Changes to Gender Expression**

