

Freedom of Information request reference number: 8349.1

Date of response: 07/03/2024

Request:

I am making the following request under the Freedom of Information Act;

1. *Within your organisation, what policies exist to support staff members who identify as transgender and are transitioning?*

2. *With respect to the question above, could you please provide a copy of the policies to support staff who identify as transgender?*

3. *Do you have any information publications or presentations available to staff regarding LGBTQ+ and Transgender, if so please could you provide details and copies of the information.*

4. *How many persons who identify as transgender are employed or volunteer with your organisation, and at what grade or position are they employed?*

5. *What advice and information do you supply to managers and staff regarding Transgender? Do you provide any specialist training in dealing with colleagues or clients who identify as transgender?*

If so, please provide copies of the relevant policies and material.

6. *Does your organisation have any connections with Stonewall or similar organisations to support employees from the LGBTQ+ and Transgender community, and if so, please could you provide further details and copies of any documents or policies?*

7. *Do you have any specific policies to support staff members transitioning/transgender in where they are deployed or employed in the organisation and in dealing with members of the public, if so please could you provide further information?*

8. *Do you have a specific lead or individual(s) who deal with LGBTQ+ issues or liaison within the organisation? If so, please could you provide details?*

9. *Do you have specific policies regarding keeping female, LGBTQ+ and transgender staff safe? If so, could you please provide details and copies of any relevant policies?*

Response:

I apologise for the short delay in completing your request. I am pleased to confirm that our Wellbeing and Diversity team have provided the answers to your questions please see the response to each question in the response below:

1. Within your organisation, what policies exist to support staff members who identify as transgender and are transitioning?

[We have a transgender policy number 323 - Transgender people in the workplace which supports staff who identify as transgender and are transitioning.](#)

2. With respect to the question above, could you please provide a copy of the policies to support staff who identify as transgender?

PN 323 is attached, please note the policy is currently under review and a new version will be published shortly on the London Fire Brigade website [here](#)

3. Do you have any information publications or presentations available to staff regarding LGBTQ+ and Transgender, if so please could you provide details and copies of the information.

We have a number of resources on our internal intranet site these include: publication about Trans Pride, Trans Week and Day of Awareness, Trans Day of Visibility, LGBTQ+ History Month, Pride and Protected Characteristics Resource Library. We also publish information on events on the London Fire Brigade external website under [news](#).

4. How many persons who identify as transgender are employed or volunteer with your organisation, and at what grade or position are they employed?

The LFB do not hold this information because we didn't have a category for trans in the monitoring questions. We are going to introduce this new question on our monitoring forms in spring 2024.

5. What advice and information do you supply to managers and staff regarding Transgender? Do you provide any specialist training in dealing with colleagues or clients who identify as transgender? If so, please provide copies of the relevant policies and material.

This is covered by the transgender policy PN323 attached. Any manager can contact Stonewall and use their resources online and ask for a 1-2-1 advice at any time.

6. Does your organisation have any connections with Stonewall or similar organisations to support employees from the LGBTQ+ and Transgender community, and if so, please could you provide further details and copies of any documents or policies?

Yes, we have achieved bronze level with Stonewall. A copy of "The report Stonewall Workplace Equality index 2023, Feedback Report 2023 " is attached.

7. Do you have any specific policies to support staff members transitioning/transgender in where they are deployed or employed in the organisation and in dealing with members of the public, if so please could you provide further information?

This is covered by the transgender policy PN323 attached

8. Do you have a specific lead or individual(s) who deal with LGBTQ+ issues or liaison within the organisation? If so, please could you provide details?

Yes, we have 2 different staff LGBTQ+ networks. One of these is affiliated with the Union. LGBTQ+ Network and LGBTQ+ Section.

9. Do you have specific policies regarding keeping female, LGBTQ+ and transgender staff safe? If so, could you please provide details and copies of any relevant policies?

This is covered by the transgender policy PN323 attached

We have dealt with your request under the Freedom of Information Act 2000. For more information about this process please see the guidance we publish about making a request on our website: <https://www.london-fire.gov.uk/about-us/transparency/request-information-from-us/>

STONEWALL WORKPLACE EQUALITY INDEX 2023

FEEDBACK REPORT

LONDON FIRE BRIGADE

Stonewall



INTRODUCTION

Thank you for participating in the Stonewall Workplace Equality Index 2023.

Whether you're taking your first steps on your inclusion journey or have been entering the Index for many years, you should be proud of your efforts to build a workplace where LGBTQ+ staff can be ourselves.

We should not underestimate the power of inclusive workplaces. After all, many of us spend most of our time at work. If we have to hide who we are, and watch what we say, it can take an enormous personal toll and hold us back from fulfilling our true potential.

Creating an environment where we can all feel comfortable will make your workplace a safer, better and friendlier place for everyone and help your colleagues be proud of who they are.

Our movement has made many strides towards LGBTQ+ equality in employment over the last 30 years, but we know there's still further to go. Thank you for joining us in that journey.

Nancy Kelley, she/her, Chief Executive Officer

At Stonewall, we stand for lesbian, gay, bi, trans, queer, questioning and ace (LGBTQ+) people everywhere. We imagine a world where all LGBTQ+ people are free to be ourselves and can live our lives to the full. We support workplaces to create environments where LGBTQ+ people feel safe, welcomed and free to be themselves.

There are many benefits to developing an inclusive workplace. When people are able to be themselves, they can spend more of their energy on their work and thrive in their roles. Diverse and inclusive teams can also lead to better innovation, collaboration and decision making. Your proven commitment to inclusion can also help make your organisation attractive to the top LGBTQ+ talent and allies, improving the success of your recruitment and staff retention. And, simply, LGBTQ+ inclusion is the right thing to do.

The Workplace Equality Index is designed to help you understand the progress of your inclusion work on a deeper level. It shows you where you have good practice in place, and where you may need to direct more focus to support your LGBTQ+ employees.

In this report, we explain your Workplace Equality Index results and show how you compare to other organisations. In each section we also share feedback to help you decide what next steps to take.

RESULTS AND SCORE SUMMARY

London Fire Brigade ranked 181st with a score of 43.5 out of 200

London Fire Brigade has been awarded a Bronze Award

The Workplace Equality Index is split into eight sections:

Section	Marks awarded	Marks claimed	Marks available	Marks claimed but not awarded
1) Policies and benefits	6.5	12	17	5.5
2) The employee lifecycle	5.5	19.5	22	14
3) LGBTQ+ employee network group	13.5	20	26	6.5
4) Empowering individuals	2	9.5	20	7.5
5) Leadership	6	11	18	5
6) Monitoring	2	3	20	1
7) Supply chain	2	8	17	6
8) External engagement and service delivery	6	8	40	2
Staff feedback questionnaire	0	0	20	0

ORGANISATIONAL CONTEXT

Stonewall has more than 20 years of experience helping to build inclusive workplaces. In that time, we've supported thousands of organisations to create environments that can attract, retain and nurture the best LGBTQ+ talent. We offer guidance on LGBTQ+ inclusion, which workplaces adapt to work for them.

Many different types of organisations enter the Workplace Equality Index and achieve top results. Entrants come from the public, private and third sectors and represent many different industries. Participants operate and are headquartered in all parts of the UK, including Wales, Scotland, Northern Ireland and England. And the size of participants varies too – from organisations with a few hundred staff to organisations to organisations with tens of thousands of staff.

We know these different contexts mean that organisations face different opportunities and challenges, whether that's to do with their budget, regulatory frameworks, or the nature of the work they do.

Though the index is designed suit this full range of workplaces, we aim to share insights into your performance compared to similar organisations and tailor our feedback to fit your context.

London Fire Brigade ranked 68th in the Public Sector

London Fire Brigade ranked 7th in the Emergency Services Sector

London Fire Brigade ranked 65th amongst organisations with 5000+ employees

London Fire Brigade ranked 79th amongst employers headquartered in Greater London

London Fire Brigade ranked 119th amongst employers that operate in Greater London

MARGINALISED AND UNDER-REPRESENTED LGBTQ+ GROUPS

This section focuses on those within our community whose stories and experiences are often less represented in LGBTQ+ inclusion work.

Bi erasure and biphobia are real problems. They create a culture of stigmatisation, and many bi people are still wary about being open about their bi identity in the workplace.

Transphobic discrimination, including against non-binary people, is an area of concern for many workplaces, with staff feeling scared and unable to be their authentic selves around colleagues.

We all have multiple facets of our identities, and many of us experience different forms of marginalisation and discrimination, such as racism and ableism. These experiences also affect many LGBTQ+ people at work. Tackling one form of marginalisation requires tackling them all: ending misogyny and making work welcoming for people of faith, for example, are important for making sure all LGBTQ+ people feel welcome.

By breaking down this data, we aim to show you how you are progressing with work that specifically addresses the needs of these groups.

London Fire Brigade scored 6.5 on questions specific to marginalised or underrepresented LGBTQ+ identities

London Fire Brigade scored 0.5 on questions specific to bi inclusion

London Fire Brigade scored 6 on questions specific to trans inclusion

London Fire Brigade scored 2.5 on questions specific to non-binary inclusion

London Fire Brigade scored 0 on questions specific to inclusion of LGBTQ+ people who experience multiple forms of marginalisation

SECTION ONE: POLICIES AND BENEFITS

This section is about your workplace policies and benefits. We ask about a range of your policies, including those on anti-discrimination, family leave and trans inclusion. We also ask about your workplace facilities and health-related support you may provide.

To ensure your policies provide clarity and support to all LGBTQ+ staff, we review the language and content included within them.

Entrant	Marks awarded	Marks claimed	Marks claimed, not awarded	Marks available
London Fire Brigade	6.5	12	5.5	17
Average: Public Sector	8.5	14	5.5	
Average: Emergency Services	10.5	14.5	4	
Average: Headquartered in Greater London	7.5	13	5.5	
Average: 5000+ employees	8.5	13.5	5	
Average: Bronze	7	13	6	
Average: Silver	8	13.5	5.5	

Strong policies and benefits are the foundation of an inclusive workplace. Having explicitly LGBTQ-inclusive policies helps ensure there are no obstacles for LGBTQ+ staff accessing the benefits and support they're entitled to.

It's great to hear that you welcome feedback on your policies. Proactively communicating this to staff will help them feel more confident to share suggestions. One way to do this is including line at the start of each policy welcoming feedback and sharing details of a team to contact.

You have a strong bullying and harassment policy in place that clearly prohibits these behaviours within your service. To develop the policy further, you could consider providing distinct examples of homophobia, biphobia and transphobia. This can support individuals to accurately identify and understand the different forms these behaviours can take.

Your family and leave policies are largely inclusive of all LGBTQ+ colleagues and couples. You did not claim any marks for your paternity leave policy – if you would like us to review this please speak to your account manager.

It's good that you've introduced a trans inclusion policy to begin supporting your trans and non-binary colleagues. We would recommend including more information about how this policy applies to non-binary people. This is an important way to signal your commitment to supporting all trans people and meet the specific needs of non-binary staff. It is excellent to hear about the in-depth

planning you have done on ensuring that you are providing sufficient gender neutral facilities across your sites. You could also consider referencing this in your trans inclusion policy.

We recommend that time off work relating to transition is treated and recorded separately to sick leave. This makes it clear that being trans is not a form of illness and helps reassure staff that taking the time they need will not affect their sick leave entitlements and pay.

The term 'transsexual' was used in the past as a more medical term. It's still used by some, although without explaining that the term can be considered outdated. many people prefer the terms 'trans' or 'transgender'. While it is a term that some people use to describe their own identity, many people find it outdated or offensive. The term is used in the Equality Act and so it should be used when directly referring to the language of the Equality Act 2010 or other relevant legislation. It may also be appropriate to include within a glossary of terms, along with some context about the use of this word. Where you're not referring to legislation, we would recommend using the term 'trans' which is widely understood as an umbrella term to describe people whose gender is not the same as, or does not sit comfortably with, the sex they were assigned at birth.

SECTION TWO: THE EMPLOYEE LIFECYCLE

This section is about the journey of employees within your organisation. We look at each stage of the lifecycle, including recruitment, onboarding and training, ongoing communications and support, and exit processes.

For each stage, we review your work to support LGBTQ+ employees and allies to build an inclusive culture.

Entrant	Marks awarded	Marks claimed	Marks claimed, not awarded	Marks available
London Fire Brigade	5.5	19.5	14	22
Average: Public Sector	8	18	10	
Average: Emergency Services	10	19	9	
Average: Headquartered in Greater London	7	16	9	
Average: 5000+ employees	8	17.5	9.5	
Average: Bronze	6	16	10	
Average: Silver	6.5	17.5	11	

From their first interactions with your organisation, it's important that LGBTQ+ staff feel welcome and all staff understand what's expected of them.

To begin attracting LGBTQ+ talent to your organisation, you could consider including a statement of LGBTQ+ inclusion and information on your LGBTQ+ staff network in your job packs and pages. We'd also suggest using diversity job boards to advertise roles. You could also consider providing specific inclusion guidance to staff with recruitment responsibilities. This can be an important way to reduce bias and ensure that LGBTQ+ candidates feel welcome.

It's great that you are providing information on your LGBTQ+ staff network at the induction stage for new joiners. You could develop this work further by issuing an explicit statement on the fire brigade's commitment to LGBTQ+ inclusion at this stage, and signposting any LGBTQ+ specific policies you have in place.

We were unable to review your training materials on your policy on discrimination, bullying, and harassment as this was not uploaded for review. Let's discuss this at benchmarking.

This year you have issued some really effective communications to all staff, covering areas such as trans awareness and your LGBTQ+ network activity. We would recommend developing this work in the coming year by covering other identities, such as bi and non-binary identities, in your awareness raising communications. You could also consider a piece on using pronouns in the workplace.

Your process for ensuring all staff have work towards diversity and inclusion recognised as part of your appraisal process is really strong. You also have a really clear procedure for ensuring that diversity-related issues can be flagged and dealt with appropriately during your exit interview process – well done.

SECTION THREE: LGBTQ+ EMPLOYEE NETWORK GROUP

This section is about your workplace LGBTQ+ Employee Network Group. This could be a formalised, stand-alone group or a specific LGBTQ+ strand of a wider Diversity and Inclusion group.

We review the support your group receives from the organisation, activities and support they offer LGBTQ+ staff and allies, and work they've done to ensure they're inclusive of all LGBTQ+ staff.

Entrant	Marks awarded	Marks claimed	Marks claimed, not awarded	Marks available
London Fire Brigade	13.5	20	6.5	26
Average: Public Sector	12	20	8	
Average: Emergency Services	14	20	6	
Average: Headquartered in Greater London	12.5	19	6.5	
Average: 5000+ employees	14.5	21.5	7	
Average: Bronze	10	17.5	7.5	
Average: Silver	13	20.5	7.5	

LGBTQ+ employee network groups can transform the experiences of LGBTQ+ people at work. They can provide spaces for peer-to-peer support, raising awareness among all staff, and act as a critical friend to the organisation.

It's great to see that at London Fire Brigade you have an LGBTQ+ network group with a defined role and terms of reference. You are supporting your staff network by providing a network budget, a formal senior champion, and providing leadership and professional development opportunities for members. You have a bi rep in place and are looking to introduce a trans rep, which is a good method of ensuring that these identity-specific issues are engaged with as part of your overall network strategy.

The network is playing a key role in supporting LGBTQ+ staff, through providing confidential support on LGBTQ+ issues and providing support for those experiencing bullying and harassment. The network has also held a great range of awareness raising events, including your cake sale to mark Trans Day of Visibility and the Pride breakfast.

To develop even further, you might consider introducing a formal strategy for the representation of underrepresented and marginalised groups within your network. You could also consider holding even more awareness raising events covering

identities you haven't specifically covered so far, such as bi and non-binary identities. We would also recommend ensuring the brigade is supporting the network by protecting time for network members to carry out network-specific activity, and providing specific skills development training for network members to carry out their network duties more effectively.

SECTION FOUR: EMPOWERING INDIVIDUALS

This section is about how you support LGBTQ+ staff and allies to stand up for inclusion and create change in your organisation.

We review how you support LGBTQ+ staff to become changemakers and share their experiences with others. We also look at the initiatives and resources you have in place to support all staff to step up as LGBTQ+ allies.

Entrant	Marks awarded	Marks claimed	Marks claimed, not awarded	Marks available
London Fire Brigade	2	9.5	7.5	20
Average: Public Sector	7	13	6	
Average: Emergency Services	8	14	6	
Average: Headquartered in Greater London	6.5	12	5.5	
Average: 5000+ employees	9	14.5	5.5	
Average: Bronze	4	10	6	
Average: Silver	7.5	13.5	6	

Engaging all staff to take an active role in creating an inclusive environment – whether they’re LGBTQ+ or not – is a powerful way to improve the culture of your organisation. The most inclusive organisations provide specific training and programmes for LGBTQ+ employees, encouraging them to step up as visible role models and changemakers.

Personal stories are a really powerful way to build understanding across an organisation and you have shared one or two examples of this. To build on this, we would recommend exploring how you can share workplace experiences from a wider range of LGBTQ+ staff. If you don’t have many staff who are out at work or comfortable to share, then looking at other workplace experiences within your sector is good practice. This gives LGBTQ+ employees the opportunity to share the barriers they have faced and non-LGBTQ+ employees the opportunity to better understand the different experiences of their colleagues.

When looking at allyship work, having formalised programmes, workstreams or initiatives in place can support you to engage non-LGBTQ+ people as allies more consistently and effectively.

SECTION FIVE: LEADERSHIP

This section is about the work of leaders in your workplace to support LGBTQ+ inclusion.

We review how you support senior leaders to learn about LGBTQ+ inclusion, as well as visibility and support they give to your LGBTQ+ and activities. We also look at how expectations of inclusive leadership are built into recruitment and appraisal processes for all leaders.

Entrant	Marks awarded	Marks claimed	Marks claimed, not awarded	Marks available
London Fire Brigade	6	11	5	18
Average: Public Sector	5.5	10.5	5	
Average: Emergency Services	7.5	13.5	6	
Average: Headquartered in Greater London	5.5	10	4.5	
Average: 5000+ employees	6.5	11.5	5	
Average: Bronze	4	7.5	3.5	
Average: Silver	6	10.5	4.5	

Visible senior champions play a crucial role in building an environment where LGBTQ+ employees can be themselves and reach their full potential. They can help set the culture of your organisation, use their influence to raise important issues, and make key decisions that impact the lives of LGBTQ+ employees.

You have done some really thorough work ensuring that senior leaders are required to meet an inclusion-based competency at the recruitment stage – well done. To embed this further, you could consider having senior leaders require an inclusion-based objective as part of the performance appraisal process.

Your senior leaders have done some good work meeting periodically with your LGBTQ+ network, speaking at internal LGBTQ+ events (such as your Pride breakfast) and attending external LGBTQ+ events, such as the Lord Mayor’s Pride reception. To develop further it would be great to see senior leaders issuing strong messages of LGBTQ+ equality, including identity-specific messages. We would also recommend ensuring that senior leaders are reviewing LGBTQ+ inclusion strategies and top-line monitoring reports within the brigade.

A good next step would be to support board and senior management employees to build their understanding of the issues affecting LGBTQ+ staff. You could consider sharing opportunities to attend events and seminars, or setting up a ‘reverse mentoring’ scheme where junior LGBTQ+ staff can directly share their experiences of your workplace.

SECTION SIX: MONITORING

This section is about how you use equalities data to understand the experiences of your LGBTQ+ staff and the progress of your inclusion work.

We review how you collect and use information about employees' sexual orientation, gender and trans status to understand experiences across staff recruitment, pay, and satisfaction. We also look at the initiatives you have in place to encourage LGBTQ+ staff to share this data with you.

Entrant	Marks awarded	Marks claimed	Marks claimed, not awarded	Marks available
London Fire Brigade	2	3	1	20
Average: Public Sector	3	10.5	7.5	
Average: Emergency Services	4.5	11	6.5	
Average: Headquartered in Greater London	3	8.5	5.5	
Average: 5000+ employees	3	9.5	6.5	
Average: Bronze	2.5	7.5	5	
Average: Silver	2.5	8.5	6	

Collecting and analysing equalities monitoring data is a key way to gather insight into the representation and experiences of LGBTQ+ staff.

It's good that you are monitoring staff data on the basis of sexual orientation. We would suggest using 'bi' instead of 'bisexual' as this is more commonly understood as an umbrella term that includes 'bisexual', 'pan', and other terms. Using 'bi' provides an option for people who have non-monosexual identities but don't use the term bisexual – it also means you're more likely to get a big enough sample size to conduct robust analysis. We would also recommend including a definition of bi where possible – either under the question, linked from the question or in surrounding comms.

Distinguishing between trans and cis identities when collecting data about employees' gender (rather than trans status) could be interpreted as invalidating trans people's identities and cause distress to trans employees. We recommend comparing the experiences of trans and cis men and women by combining data from questions on gender and trans status. We would recommend reviewing this at the next opportunity. You could consider introducing a specific question about trans identity to gather insights into the experiences of your trans employees. We can share good practice wording to support with this.

To gather the most helpful data, it's important to use inclusive questions, clearly communicate why you're collecting the data, and provide information about data protection and confidentiality. Once you've collected this data, you can conduct

in-depth analysis to inform where you should focus your inclusion efforts. By feeding back to staff how you're responding to these insights, you'll encourage their engagement in future exercises.

SECTION SEVEN: SUPPLY CHAINS

This section is about how LGBTQ+ inclusion is built into your supply chain or procurement processes.

We review how you encourage other organisations to advance their LGBTQ+ inclusion practices at all stages of the process, from tendering to engaging with existing suppliers.

Entrant	Marks awarded	Marks claimed	Marks claimed, not awarded	Marks available
London Fire Brigade	2	8	6	17
Average: Public Sector	3.5	7	3.5	
Average: Emergency Services	5	8.5	3.5	
Average: Headquartered in Greater London	3	6	3	
Average: 5000+ employees	4.5	8	3.5	
Average: Bronze	1.5	4.5	3	
Average: Silver	1.5	5	3.5	

Ensuring that your supply chain processes are LGBTQ-inclusive helps advance equality beyond your four walls. It also helps prevent your staff and service users experiencing discrimination in their interactions with your suppliers. This could be a good area to focus on next.

It's great that you have a standing item on diversity and inclusion in your contract management meetings with your key strategic suppliers. As a next step, we would recommend asking potential key suppliers about their LGBTQ+ inclusion practice. For example, you could ask whether they have foundational policies in place that ban bullying, harassment and discrimination, and request to review these. This signals that you expect all suppliers to uphold your values of equality and inclusion.

It's unclear if you require potential suppliers to make improvements where they don't meet your expectations around LGBTQ+ inclusion. Having clear, consistent processes for requiring improvements – for example, by agreeing tangible goals and timeframes for improvement – is a robust way to embed LGBTQ+ inclusion in your supply chain.

We would also encourage you to continue to build inclusion into your work with existing suppliers. For example, you could consider holding joint LGBTQ+ diversity and inclusion training with your suppliers.

SECTION EIGHT: EXTERNAL ENGAGEMENT

This section is about how you embed LGBTQ+ inclusion in your external-facing work.

We review how you promote LGBTQ+ equality in how your sector and support the wider LGBTQ+ community.

Entrant	Marks awarded	Marks claimed	Marks claimed, not awarded	Marks available
London Fire Brigade	6	8	2	40
Average: Public Sector	10	22	12	
Average: Emergency Services	12.5	23.5	11	
Average: Headquartered in Greater London	9	16.5	7.5	
Average: 5000+ employees	11.5	21.5	10	
Average: Bronze	6	13.5	7.5	
Average: Silver	8.5	20.5	12	

Strong external engagement with LGBTQ+ equality issues is a great way to signal that London Fire Brigade is an inclusive workplace, both within your sector and to the wider community. It can also help make prospective LGBTQ+ staff aware of the great initiatives you are involved with.

It's great to hear about how you have engaged with LGBTQ+ campaigns over the last year, such as through the photography exhibition you held at the Euston Fire Stations celebrating LGBTQ+ firefighters. You also shared good messages of LGBTQ+ equality on your social media accounts. To expand on this work you might consider sharing some identity-specific messages, such as bi and trans specific messages.

You could also consider ways to support LGBTQ+ groups and initiatives. This doesn't need to be financial support – for example it could involve sharing meeting space or expertise. You could also use your platform on social media to share messages of equality or support for specific campaigns.

STAFF FEEDBACK QUESTIONNAIRE

The Staff Feedback Questionnaire is an anonymous survey that we ask Workplace Equality Index participants to share with all their employees. The results form part of your total score, alongside your main submission.

We ask respondents about their identities and experiences relating to inclusion in the workplace.

Entrant	Marks awarded	Marks eligible	Marks eligible, not awarded	Marks available
London Fire Brigade	0	0	0	20
Average: Public Sector	8	16	8	
Average: Emergency Services	8	15	7	
Average: Headquartered in Greater London	10	14.5	4.5	
Average: 5000+ employees	10.5	17.5	7	
Average: Bronze	6	11.5	5.5	
Average: Silver	8.5	16	7.5	

ABOUT THIS REPORT

This report is produced by Stonewall, a UK-based charity that stands for the freedom, equity and potential of all lesbian, gay, bi, trans, queer, questioning and ace (LGBTQ+) people.

At Stonewall, we imagine a world where LGBTQ+ people everywhere can live our lives to the full.

Founded in London in 1989, we now work in each nation of the UK and have established partnerships across the globe. Over the last three decades, we have created transformative change in the lives of LGBTQ+ people in the UK, helping win equal rights around marriage, having children and inclusive education.

Our campaigns drive positive change for our communities, and our sustained change and empowerment programmes ensure that LGBTQ+ people can thrive throughout our lives. We make sure that the world hears and learns from our communities, and our work is grounded in evidence and expertise.

To find out more about our work, visit us at

Registered Charity No 1101255 (England and Wales) and SC039681 (Scotland)

Stonewall is proud to provide information, support and guidance on LGBTQ+ inclusion; working towards a world where we're all free to be. This does not constitute legal advice, and is not intended to be a substitute for legal counsel on any subject matter.

Transgender people in the workplace

New policy number: **323**
Old instruction number: **MAN:R005:a7**
Issue date: **16 June 2003**
Reviewed as current: **3 July 2015**
Owner: **Assistant Director, People Services**
Responsible work team: **Cultural Change**

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Review date: **3 July 2018** Last amended date: **17 August 2023**

1 Introduction

- 1.1 LFB wants to be as supportive as possible to transsexual/transgender (or "trans") people. These revised guidelines have been developed by the chief fire officers association (CFOA) Professionals Group in conjunction with the Stakeholders Group and issued by Communities and Local Government to provide information about the rights of trans people, to assist managers to support staff who have either changed their gender identity before they joined the LFB or who are changing their gender identity during the course of their employment, and suggests good practice for fire and Rescue Services as employers and providers of services.
- 1.2 Gender variation is nothing new. Trans people are recognisable throughout history and appear in every culture. In some societies such people are revered for the special way in which they appear to transcend the conventional division between masculine and feminine. Care and respect begins with appreciating that all people are individuals. The LFB is there for everyone, no matter in what way they are different.
- 1.3 The LFB continues to develop a positive approach to trans equality. We aim to enable people to participate fully and equally in all of our organisation's work regardless of their gender identity. Respecting, supporting and valuing all employees is a key goal in the national FRS Equality and Diversity Strategy 2008-2018. The LFB will recruit the most talented staff for the job, and to retain skills and knowledge developed through training and practical experience. We cannot afford the luxury of turning people away or allowing them to be forced from existing jobs on the basis of ignorance, prejudice or poor attention to people's needs and concerns. Not only is discrimination towards trans people unlawful, it wastes talents and lives and must be considered unacceptable by everyone who subscribes to the values of the LFB.
- 1.4 Appendix 1 details the terms used in this policy.

2 Employing and retaining trans people

- 2.1 The key to planning how to achieve and maintain trans inclusion requires an understanding of the settings in which barriers and problems can present themselves – whether intentionally or unwittingly. It can be helpful to think of these in terms of the particular "trigger points" where issues might arise.
- 2.2 The three obvious trigger points are:
 - Recruitment of someone who is already undergoing or has undergone gender reassignment;
 - The time when an existing member of staff discloses that they are planning to undergo gender reassignment;
 - And the previously undisclosed gender history of a trans employee becomes known to colleagues or the public (or becomes the subject of speculation) – this may happen with or without the consent of the individual.
- 2.3 Trans equality should be regarded as important by all employers. The LFB does not know the life history of all their staff or job applicants and we do not know what is going to happen in the future. Regardless of whether there are any "out" trans staff, the LFB has recruitment policies and procedures that treat trans workers fairly and which make it clear to candidates that discrimination is not tolerated.

3 Recruitment and interviews

- 3.1 Our recruitment policies and procedures must treat trans workers fairly and make it clear that discrimination is not tolerated.

- 3.2 Trans people are not required to disclose their gender history as a condition of employment. For most people this is a very private matter relating to their medical history. Most trans people will have experienced prejudice and harassment as a result of disclosure in the past and have good reason to suspect that this will happen again. If a candidate does choose to talk about their gender history, it would be unlawful to use this as a reason to not offer them a job. It is also unlawful to dismiss someone for not disclosing their gender history, or for disclosing it at a later date.
- 3.3 Many communities believe that monitoring equalities information of job candidates and workers helps prevent discrimination. However, trans equality groups mostly advise that employers do not monitor gender history or gender identity in the recruitment process, and many trans people will not trust that it is safe to disclose the information. Also, after reassignment, many trans people will cease to identify as trans. The LFB does not monitor the trans status of any of its staff.

4 Disclosure and barring service applications

- 4.1 The LFB requires some of its new and existing staff to apply for a Disclosure and Barring Service (DBS) disclosure. This means there can be some anxiety about the implications of this for trans applicants and existing staff.
- 4.2 Staff should be aware that the DBS has a special process for trans people who are concerned about the confidentiality of their gender history but still ensures that any previous criminal history cannot be hidden.

Contact details for the Sensitive Applications Team can be found in Appendix 3.

Staff need to be aware that in some cases there is no way of avoiding the disclosure of their former identity to the LFB. However, our policy for dealing with DBS applications and data instructs staff on how to deal with this eventuality in a responsible manner if it occurs. This includes reassurances that will need to be given to the applicant/member of staff in the event that the offence itself is not serious enough to preclude employment.

5 Changing gender identity

- 5.1 A diagnosis of gender dysphoria is carried out by specialists and may take a matter of months or a period of years. Preliminary diagnosis is usually followed by hormone therapy and typically after around six months the person's physical appearance will begin to change. The person may start to live full time as a member of their 'new' gender before they begin hormone therapy or they may wait until after hormone therapy has started to change their physical appearance. Some people remain in their old gender role at work for longer. People can continue to work throughout this period. When the person starts to live as a member of their 'new' gender, their name and other records will be formally changed. From this point they should be treated as belonging to their 'new' gender for employment purposes. They may go on and have surgery after one or two years of hormone therapy.
- 5.2 Gender transition demands a great deal from the person experiencing it, and usually creates a tremendous emotional burden, which may manifest in a range of ways including anxiety and depression. Medication may cause side effects and individuals may need reduced hours and/or modified duties for a limited period. The LFB recognises the stress under which the employee is likely to be living, and appreciates that this is likely to be resolved as transition proceeds.
- 5.3 When conducting consultation, reviewing policy and undertaking impact assessments on services, it is also helpful to see things from the mindset encouraged by the Social Model of Disability. This is not to say that being a trans is a disability. The point is that many of the

experiences that people have do not arise inherently from their condition; instead they are a result of the way society has been organised without taking account of their existence. Changing gender role is a positive thing for trans people. It involves moving from a state that feels wrong or unnatural to a place where the individual is able to express their true self. Any anxiety therefore does not arise from that transition itself, but from the reaction of others and the obstacles they place in the trans person's path. If service managers find that providing services to trans people requires a rethink or special arrangements, that is not the 'fault' of the trans person for being different; the problem is that the service was not designed with them in mind.

- 5.4 An employee who plans to change their gender identity (sometimes known as transitioning) should first inform a manager or colleague from Human Resources or the equality manager. The employee should agree who they would wish to have as the main point of contact (ideally this would be their line manager) – this will be the person who will manage the transition from the LFB's perspective, and they should discuss what help and support is needed. A positive and constructive approach should be adopted to supporting the employee throughout the process and should be approached as a joint project. The LFB will ensure that the manager has the skills and support to act appropriately.
- 5.5 An employee who intends to undertake gender reassignment will be required to sign a disclaimer authorising the LFB to amend all their internal records.

6 Action plan

6.1 An action plan will be agreed setting out how the transition will be handled at work. Central to this approach is the knowledge that the person with the greatest commitment to a successful outcome is the individual themselves and their personal expertise will be valued. Most transsexual people are experts on the details of what is going to happen, and what the implications are going to be. The process will depend on the timetable of the transition process, on the particular levels of treatment or surgery for that person and on the individual's wishes. Where treatment is provided by the NHS it cannot be planned easily and is dependent on the gender clinic and funding authority. The action plan will address the following issues:

- Whether the employee wants to stay in their current post or be redeployed.
- The expected timescale of any medical and surgery procedures.
- The expected point or phase of change of name, personal details and gender.
- What time off will be required for treatment and/or possible side effects.
- Whether the employee wishes to inform line managers, co-workers and service users themselves, or would prefer this to be done for them.
- What amendments will be required to records and systems.
- What training or briefing of co-workers or service users will be needed and when and by whom this will be carried out.
- How the LFB should respond to any media enquiries.
- Sources of additional support e.g. community group, support group, or trade union (both Fire Brigades Union and UNISON have LGBT groups and the GMB (Southern Region) has an LGBT officer).

7 Absence from work

7.1 A person who decides to undergo medical and surgical procedures relating to gender reassignment may need some time off work. This policy acknowledges that assessment by a qualified professional may take several months or even years. Appointments may involve travelling long distances, so are likely to take a whole day. Following this, there may be a period of one or more years before the person is accepted for surgery and some people may require

more than one operation. It is accepted that the time off following this will vary greatly, from one week to around 12 weeks, depending on the nature of the surgery and the physical demands of the person's job.

- 7.2 When the individual needs to be absent for treatment or surgery then normal sick pay arrangements will apply. Any reasonable absence because of the effects of treatment for gender reassignment will not normally be taken into account for the purposes of formal action for unsatisfactory attendance.
- 7.3 Subject to the exigencies of the service, flexibility will be given to individuals who may need to take holiday or rearrange working hours in order to attend additional appointments outside of work. The extent of any surgical procedures will vary according to the needs of the individual, will differ from person to person and according to whether the person is transitioning from male to female or from female to male.

8 Communications with colleagues

- 8.1 The LFB will agree with the individual when and how widely they wish their change in gender identity to be made known and will arrange for an agreed communication process to be undertaken in a structured way. Colleagues will require, and often request, information and development. Education takes place on two levels: general information about transgender people, and specific information for people to understand the situation of this particular person. The right of all people to work in dignity and free from discrimination and the unacceptability of harassment must be made clear. The right to medical confidentiality should also be respected. It is good practice for the LFB to take responsibility for informing those who need to know but the wishes of the individual should be given priority.

9 Change of name

- 9.1 All members of staff must refer to the employee by their chosen name and use pronouns appropriate to their gender identity. Not only is the choice of the wrong terms a display of bad manners, such behaviour and errors (intended or accidental) can destroy the trust that is essential between colleagues in the workplace.

10 Use of facilities

- 10.1 The use of toilets, locker rooms and showers can occasionally be an issue in the workplace, particularly during the early stages of transition if colleagues were familiar with the employee in their former role. However, if anxieties are acknowledged and responded to in a thoughtful manner, concerns can usually be overcome. The usual point for starting to use opposite gender facilities will be the day the employee starts coming to work in that role. Insistence that a trans person use the facilities of their birth sex or an accessible toilet may count as unlawful discrimination.
- 10.2 For reasons of health and safety, operational personnel must have access to washing facilities at work. After they start the transition process, trans men and women will be able to use the appropriate communal facilities if they wish. They may be able to negotiate the use of private washing and changing facilities if they exist. Consideration will be given to reasonable adjustments, such as redeployment, if private facilities are required for a limited time. Following gender reassignment or legal recognition, trans people must be supported to use all facilities designated for other members of their acquired gender.

11 Uniform

- 11.1 Where uniform is provided the LFB is legally bound to provide a new uniform that is consistent with any change in gender role. It is essential that the individual receives any new uniform as early as possible in order for them to try it on at home and become comfortable wearing it.

12 Harassment

- 12.1 Any incidents of harassment or bullying against trans employees should be dealt with in accordance with the LFB's Harassment Complaints Policy. All staff are required to treat colleagues and members of the public in an inclusive and respectful manner regardless of their gender presentation.

13 Confidentiality and record keeping

- 13.1 Confidentiality is crucial. Some trans staff members may be out at work about their gender history. This is their decision alone. Being out to one person or a small group of people does not necessarily mean a person wants to be out to everybody. The LFB's personnel records (both hard copy and electronic) for an employee that has transitioned must not refer to a previous name and that records made before a change of name are updated.
- 13.2 There may still be some records which identify a person's gender history, such as records of absence for medical treatment. For people without a Gender Recognition Certificate, some records, for example those relating to pensions and insurance, may include a reference to their legal sex. Access to any records showing the change of name and any other details associated with the person's transgender status will be stored appropriately and restricted to staff who 'need to know' for specific reasons. 'Need to know' refers to those directly involved in the administration of a process, for example the appropriate Human Resources or Finance section who authorises payments into a pension scheme.
- 13.3 Breaches of confidentiality will be treated in a serious manner and may amount to unlawful harassment. Where there are existing policies on issues of confidentiality, harassment and insurance these should be amended to address transgender equality.
- 13.4 The law recognises the seriousness of confidentiality issues. The Gender Recognition Act 2004 gives anyone applying for or holding a Gender Recognition Certificate particular privacy rights. It is a criminal offence to pass on information acquired 'in the course of official duties' (e.g. a line manager, HR officer, trade union rep) about someone's gender recognition, without the consent of the individual affected.

14 Gender recognition certificate

- 14.1 The key purposes of the Gender Recognition Certificate are to enable trans people to:-
- Have their UK birth certificates corrected to reflect their acquired gender;
 - Have a marriage or civil partnership in their acquired gender;
 - Have gender-specific benefit and pension entitlements calculated using their acquired gender.
- 14.2 Individuals will need to demonstrate that the LFB has changed its records before a Gender Recognition Certificate is issued. A Gender Recognition Certificate is **not** required for the purposes of changing a person's gender role in all other aspects of their day-to-day life (including using toilets and changing all documentation such as their passport, driver's licence, bank accounts, medical records, and employment records).

15 Contact

15.1 For further information and advice please contact the equality manager.

16 Information sources

16.1 These revised guidelines were commissioned by the Communities and Local Government. The contents of this policy are largely based on two other documents and are listed in Appendix 3.

Appendix 1 - Definitions and terminology

Definitions

- 1 Gender identity: A person's internal sense of where they exist in relation to male and female.
- 2 Transsexual person: Legal/medical term for someone who lives (or wishes to live) permanently in the opposite gender to that assigned at birth. In 2007, the Government estimated that there were 7,500 transsexual people in the UK. However, GIRES estimated, in a Home Office funded survey, that around 300,000 people may experience some degree of gender variance.
- 3 Transgender person: Someone who has a deep conviction that their gender does not conform to the sex they were assigned at birth. These are inclusive, umbrella terms, including people who describe themselves as transsexual, transvestite or cross dressing people, and people who cross contemporary cultural gender boundaries for any reason.
- 4 Gender dysphoria: Medical diagnosis of a consistent and overwhelming desire to live in the opposite gender to that assigned at birth.
- 5 Gender reassignment: The process of transitioning from the gender assigned at birth to the gender the person identifies with. This may involve medical and surgical procedures.

Why are different terms important?

- 6 The simplest distinction is that 'trans' or 'transgender' are terms of choice often adopted by people to describe themselves, whereas 'transsexual' remains a medically defined term, appearing in diagnostic guides, and ascribed to people by doctors. In the case of trans people, for a range of reasons, not everyone will be seeking or have undergone gender reassignment. Many trans people undergoing gender reassignment still reject the term 'transsexual' because of its links to historical approaches that were grounded in theories about mental disorder and sexual deviancy.
- 7 As far as possible, this guide endeavours to use the more encompassing term 'trans', which is replacing 'transgender' in common usage. However, it is necessary to refer to 'transsexual' people specifically where the law uses narrower definitions to ensure there is clarity in relation to legal duties.

Sexual orientation

- 8 It is important not to make any assumptions about a trans person's sexual orientation. Trans people can be heterosexual, lesbian, gay or bisexual like everyone else.

Appendix 2 - Summary of legislation

The Equality Act 2010 gained Royal Assent in April 2009 and came into force in October 2010. The Act replaced nine pieces of legislation (including the Equality Act 2006, the Gender Recognition Act 2004, and the Sex Discrimination Act 1975, as amended by the Sex Discrimination (Gender Reassignment) Regulations 1999), which laid the building blocks for the current position for transsexual people.

The Equality Act 2010 includes common basic definitions of direct and indirect discrimination which will apply to nine protected characteristics, including gender reassignment, and it is against the law to discriminate or harass on any of these grounds.

The Act states that "a person has a protected characteristic of gender reassignment if the 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. A reference to a transsexual person is a reference to a person who has the protected characteristic of gender reassignment."

Discrimination means treating a transsexual person less favourably than another worker who is not contemplating, undergoing or has undergone gender reassignment. For example, to establish whether there has been less favourable treatment of someone undergoing gender reassignment in terms of time off, the absence allowed to them should be compared with absence due to sickness or injury of other people which in their case is not related to gender reassignment.

Going further – best practice

The strict letter of the law in relation to equality and human rights is intended to be the baseline for policies and conduct within the Fire and Rescue Service. The fact that the law does not strictly require a particular action to promote equality, dignity and respect for staff or members of the public does not preclude managers from aiming higher and seeking to level up the way everyone is treated and regarded.

Appendix 3 - Information sources

- 1 The contents of this policy is largely based on two other documents –
 - (a) "Bargaining for transgender workers rights", UNISON 2008
(www.unison.org.uk/out/docs_list_wpr.asp)
 - (b) "Trans: A practical guide for the NHS", Christine Burns 2008
(www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_089941)

Specialist Organisations

- 2 The following trade unions have a network for lesbian, gay, bisexual and trans (LGBT) members:

- (a) Fire Brigades Union LGBT Group
www.fbu;gbt.org.uk
pcarberry@fbu.org.uk
0208 541 1765
- (b) UNISON LGBT Group
UNISON Centre
130 Euston Road
London
NW1 2AY
www.unison.org.uk/out
out@unison.co.uk
0800 085 7857
- (c) GMB – Southern Region - lesbian gay bisexual trans section SHOUT
GMB Southern
Cooper House
205 Hook Road
Chessington
Surrey, KT9 1EA
<http://www.gmb-southern-shout.org.uk>
contact@gmb-southern-shout.org.uk
07419 981 543 (leave a message or text if unavailable)

Michelle Gordon
GMB Political & Equality Officer
020 8397 8881

- (a) Disclosure and Barring Service
sensitive@dbs.gsi.gov.uk

Sensitive Applications Team
Customer Services
PO Box 165
Liverpool
L69 3JD

- 3 The LFB has a commitment to promote best practice in the way we employ and communicate with staff, and wants to involve all groups of staff in service planning and equalities action planning, so that decisions are informed by the experience of staff at all levels and in all groups. Developing specific equalities support networks has proven a useful mechanism through which this can be achieved. The LFB has a Lesbian, Gay, Bisexual and Transgender (LGBT) Support Group and can be contacted through their email address - LGBTsupportgroup@london-fire.gov.uk.
- 4 The following are also specialist trans equality groups:
- (a) Gender Identity Research and Education Society (GIRES)
Milverley
The Warren
Ashted
KT21 2SP www.gires.org.uk, info@gires.org.uk, Tel: 01372 801554
 - (b) Press for Change
BM Network
London
WC1N 3XX
www.pfc.org.uk, office@pfc.org.uk Telephone Advice Line 08448 708 165
 - (c) The Gender Trust

76 The Ridgeway
Astwood Bank
Worcestershire
B96 6LX

info@gendertrust.org.uk, Tel: 01527 894 838

Document history

Assessments

An equality, sustainability or health, safety and welfare impact assessment and/or a risk assessment was last completed on:

EIA	20/07/2007	SDIA	10/08/2023	HSWIA	11/08/2023	RA	
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Audit trail

Listed below is a brief audit trail, detailing amendments made to this policy/procedure.

Page/para nos.	Brief description of change	Date
Para 10.2 Para 14.1 Para 15.1 Para 15.2	New Change in wording Slight change in wording New	24/04/2009
Throughout	Major amendments throughout policy, please read through to familiarise yourself with the new content	13/07/2010
Throughout	Equalities Team updated to the Corporate Management Team in line with the To Management Review.	13/10/2011
Page 4, para 5.1	Line 7, the words 'full time' were deleted after the word 'live'.	17/05/2012
Throughout	Minor changes to terminology.	20/03/2013
Page 12	SIA date has been added to this policy.	22/01/2014
Page 12	Subject list and FOIA exemptions tables updated.	16/12/2014
Throughout.	Changes made to reflect change of ownership. Contact details updated. Reviewed as current.	03/07/2015
Page 1	Owner title and responsible work team details changed and changes to reflect the abolition of London Fire and Emergency Planning Authority, now replaced with London Fire Commissioner.	15/08/2018
Page 13	SDIA and HSWIA updated.	17/08/2023

Subject list

You can find this policy under the following subjects.

Employment	Equalities
Gender	Transgender

Freedom of Information Act exemptions

This policy/procedure has been securely marked due to:

Considered by: (responsible work team)	FOIA exemption	Security marking classification