

[Note my name is **REMOVED**, address **REMOVED**. I would ask that my address not be published on any website as I live alone, have a disability and would rather not have my private details made so publicly available. I am just a lay member of the public, but have become concerned about this issue in the past while. I have previously sent a few questions in to the email address gender@welfare.ie, as I wasn't sure who to direct some questions at. I have also sent the same questions to the minister. They weren't really my submission but this is it below. I am just explaining this in case you are wondering why there were 2 emails from me]

My main concerns on this issue are to do with women's privacy and safety, and the protection of children.

Comments in relation to “on the current operation of the Gender Recognition Act 2015 and in relation to possible future operational and policy considerations.

and under

(e) Any other relevant issues, including issues relating to the operation of the current legislative provisions.

On Gender Recognition Certificates (cases for refusal or revocation)

Is someone who has committed a sex crime excluded from being able to get a Gender Recognition Certificate?

If someone has already received a Gender Recognition Certificate before being convicted of a sex crime, is the Gender Recognition Certificate revoked?

I think being involved in a sex crime should preclude people from getting a Gender Recognition Certificate. I am particularly worried about male sex offenders deciding to identify as women either to hide their identity, and/or in order to gain easier access to potential victims.

I would like to see an amendment to this bill that says people who have committed sexual offences cannot obtain a Gender Recognition Certificate or if they already have one that it can be revoked.

There could be other reasons to deny a Gender Recognition Certificate, such as someone who had committed fraud who might be trying to hide their true identity, or even violent criminals trying to do the same. But my main concern, personally, would be with the sex-offenders.

Regarding Transgender inmates in Prison

As far as I am aware, in Ireland, people are currently housed in prisons on the basis of their biological sex. I am not sure this is the case, as the choice of male or female prison might be dependent on the birth cert, and people can change the sex on their birth-cert.

I have written to a government minister seeking clarification on this. Apparently there have been only a few trans-identified prisoners in Ireland the last few years so there is a chance there is no policy on this.

I think violent (biologically) male offenders should not be housed with female prisoners. I think this needs to be specified in law.

I do think there might be a case for having some sort of special provision for transgender (and maybe gay) inmates. But I do not think violent biologically male offenders should be placed with female prisoners, regardless of how they identify.

Transgender males commit crimes at the same rate as biological males.

The only long-term study of transgender outcomes concluded that “Male to Female” transsexuals [retain male-pattern criminality, including crimes against women](#). [Long-Term Follow-Up of Transsexual Persons Undergoing Sex Reassignment Surgery: Cohort Study in Sweden <http://journals.plos.org/plosone/article?id=10.1371/journal.pone.0016885>] Are all transwomen predators? Of course not: They are predators at exactly the same rates as any other males.

<https://gendertrender.wordpress.com/2015/04/07/statistics-show-the-difference-in-rates-of-violent-crimes-against-women-committed-by-transwomen-versus-non-transgender-males/>

There may be a dis-proportionality large percentage of sexual and violent offenders amongst trans-prisoners in the UK (this could be partly due to people identifying as trans, who just want special privileges, or to be moved to a female prison. However under self-identification there is no way of distinguishing “real” transgender people from opportunists.)

Half of all transgender prisoners are sex offenders or dangerous category A inmates

<https://fairplayforwomen.com/prisons/transgender-prisoners/>

There is a chance the percentage given above is artificially high, they discuss this in the paper, but the number seems to be still quite high even at a lower estimate. They mention the number could be inflated by opportunists.

They quote the [British Association of Gender Identity Specialists \(BAGIS\)](#) as saying:

"It has been rather naively suggested that nobody would seek to pretend transsexual status in prison if this were not actually the case. There are, to those of us who actually interview the prisoners, in fact very many reasons why people might pretend this. These vary from the opportunity to have trips out of prison through to a desire for a transfer to the female estate (to the same prison as a co-defendant) through to the idea that a parole board will perceive somebody who is female as being less dangerous through to a [false] belief that hormone treatment will actually render one less dangerous through to wanting a special or protected status within the prison system and even (in one very well evidenced case that a highly concerned Prison Governor brought particularly to my attention) a plethora of prison intelligence information suggesting that the driving force was a desire to make subsequent sexual offending very much easier, females being generally perceived as low risk in this regard. I am sure that the Governor concerned would be happy to talk about this."

The quote the [British Psychological Society](#) (BPS) submission to the Trans Equality Inquiry as saying:

"psychologists working with forensic patients are aware of a number of cases where men convicted of sex crimes have falsely claimed to be transgender females for a number of reasons"

The article quotes a comment from a prisoners website which is interesting:

The thoughts and observations of prison inmates can be found in online prison forums such as www.insidetime.org. The high level of sex offenders who are declaring themselves transgender has been commented on. This is an extract from a [post](#) by a male prisoner, who commented in December 2016 on the increasing numbers of transgender prisoners: "I find it pretty suspicious that the majority of these trans-jesters, as I call them, are sex offenders, and it turns out that transgender people do not have to do the Sex Offenders Treatment Programme".

The Times (UK) ran an article on this a few years ago:

Male prisoners jump at transgender privileges

"A SHARP increase in the number of male prison inmates living as women has prompted a government review amid concern that some could be fooling officials to obtain privileges.

Up to 100 transgender prisoners now have the right to ask to wear women's clothing, to use private washing facilities and to be searched only by female prison officers despite not being diagnosed with gender dysphoria, the medical term for those whose biological sex does not match the gender they feel themselves to be.

The increase has caused disciplinary and management problems for prison governors and staff, many linked to what is described as inappropriate behaviour ranging from aggression to oversexualised conduct.

...The increase in the number of male prisoners wanting to live as women follows the introduction of the care and management of transsexual prisoners policy in 2011.

It was intended to help staff deal with genuine cases of gender dysphoria, but critics say it is flawed because it allows prisoners to declare themselves as transgender without medical diagnosis and pressurises prison authorities to grant private washing and laundry facilities, widely seen as privileges. There is also a perception that transgender inmates have a better chance of being granted parole.

<https://www.thetimes.co.uk/article/male-prisoners-jump-at-transgender-privileges-5zxhkc0jp0n>

Here are some examples of cases of transgender identified biological males as sex abusers. The first one was a trans-activist, which shows that even though there are people who might be faking it, it doesn't mean that *some* "real" transgender people are not a potential threat to female prisoners also. This is why I think biologically male violent offenders, especially sex offenders, should not be put in with female prisoners. A clear policy is needed I think on this, otherwise it is a potential disaster waiting to happen.

Some cases that back-up this concern:

A transactivist who was a sex-abuser:

"Terf Tracker" Allison Woolber: outed as violent sex offender, resigns, citing his "unconscionable behavior as a human being"

"Allison Woolbert, founder of the "Terf Tracker", "Trans Violence Tracking Portal" and "Transgender Human Rights Institute" resigned today when his criminal past as a violent sex offender was revealed by fellow transwomen Wesley "Laurelai" Bailey and Harrison "Melissa" Savage. Bailey and Savage formerly assisted Woolbert in his cyber-stalking projects, where they "doxxed" and harassed women they suspected might disbelieve that men such as themselves can "become women" by merely proclaiming themselves as such."

<https://gendertrender.wordpress.com/2015/01/08/terf-tracker-allison-woolbert-outed-as-violent-sex-offender-resigns-citing-his-unconscionable-behavior-as-a-human-being/>

Women forced to shower with male inmates

"Three female inmates at Federal Medical Center Carswell in Fort Worth have filed a flurry of complaints, upset over the Bureau of Prisons policy that allows transgender inmates who are still biologically male to be placed in female prisons.

..The Plaintiffs have been forced to share intimate facilities with men, who allege they are women,” the Feb. 15 complaint states. “These men openly express their sexual desire for the women inmates, at times, in the showers, and bathrooms, while women are naked or partially clothed.

“The men expose themselves, intentionally, for their own sexual gratification, causing the Plaintiffs to suffer disgust, embarrassment, humiliation, stress, degradation, fear and loss of dignity.”

<http://www.star-telegram.com/news/local/community/fort-worth/article134353039.html>

Transgender inmate's request poses quandry for Cass County, ND officials

Capt. Andrew Frobig, the jail administrator, said he has housed inmates with the gender they identify with before, but doesn't believe it advisable to do so for Fly. "He willfully has sex as a male with females," Frobig said, referring to Fly. "Considering he's got crimes related to that, I have to take that into account with a female population."

Fly is awaiting sentencing after pleading guilty to transporting a female victim across state lines for criminal sexual acts. Fly is accused of fathering a child with the victim, and prosecutors say they have DNA evidence to prove it, according to court records.

<http://www.duluthnewstribune.com/news/4387530-transgender-inmates-request-poses-quandary-cass-county-nd-officials>

Another:

Man, set to become a woman, poses problem for Quebec prison authorities

Veilleux, formerly Sylvain, is awaiting surgery to change gender, but until that happens, she is treated as a man. Nevertheless, she wants to be sent to a woman's jail...

Before being sentenced Monday for sexually attacking a young girl in the mid-1990s when she was still known as Sylvain, Veilleux was held in Maison Tanguay, a provincial jail for women.

That was a problem, said Line Boucher, who was at the jail with Veilleux. The women there were not comfortable having Veilleux around because, although legally a woman, she still has men's sexual organs. There were disturbances at the jail because Veilleux was there, Boucher said.

<http://www.cbc.ca/beta/news/canada/man-set-to-become-a-woman-poses-problem-for-quebec-prison-authorities-1.733654>

This is a current case of a sex offender who is transgender who wants to be moved to a women's prison. Part of his "nightmare" prison ordeal seems to be not getting a hair-straightener or make-up.

Transgender woman in male prison 'nightmare' on hunger strike

https://www.theguardian.com/society/2018/jan/27/marie-dean-trans-prisoner-male-prison-hunger-strike?CMP=Share_AndroidApp_Copy_to_clipboard

An interesting critique of how this article was originally reported which includes this incisive comment:

The Marie Dean story shows there's no simple answer to how we treat transgender prisoners

'If the gender revolution means a voyeur's right to be seen as a woman is being placed ahead of women's right to be safe from a voyeur, something has gone very wrong.'

https://www.newstatesman.com/politics/feminism/2018/01/marie-dean-story-shows-there-s-no-simple-answer-how-we-treat-transgender?amp&_twitter_impression=true+

Privacy rights (for females primarily)

I would like to know what happens if there is a conflict between privacy rights based on biological sex, and gender identity rights? Are there situations where sex-based privacy rights over-rule gender identity rights? I have asked the minister, Regina Doherty, about this but I may not get a reply before submitting this so I wanted to bring it up.

Some women might prefer a biological female to perform intimate medical exams (e.g. smear tests). I am talking primarily about non-emergency situations, where the women should be accommodated.

There was a story recently in the UK about a woman who had requested a female nurse to do a smear test and a male transgender nurse was sent in

The female NHS nurse I asked for came with stubble

"A woman who requested a female NHS nurse to perform her cervical smear test was "embarrassed and distressed" after a person with stubble and a deep voice summoned her for the intimate procedure."

<https://www.thetimes.co.uk/article/the-female-nhs-nurse-i-asked-for-came-with-stubble-83rq9p0gg>

Will it be considered "transphobic" and even illegal to refuse an intimate exam by a Trans Identified biological Male? Or will people be allowed to chose having a biological female perform the exam?

What happens in a situation where a transwoman (so biologically male), who has a gender recognition certificate that recognises them as female, wants to access female changing rooms? I am talking about intact males here who have not had penile surgery. I wouldn't mind the people who had surgery.

Do the women's right to privacy, and desire not to share a changing space with someone with a penis, override the person's gender recognition certificate? Who decides? Is the gym, club or wherever this happens allowed to exclude a biological male from the womens changing rooms on privacy grounds?

I don't know if laws have been written to deal with this sort of situation here.

I know some people hear about this issue and don't really understand why some women have concerns (even after the #MeToo debate!). Sometimes they say that if people want to attack they will do it anyway. However, by this logic we should not only leave our doors unlocked at night, we should leave a not up telling people anyone can enter, because if someone is going to break in they will do it anyway, right?

People sometimes take precautions for their own privacy or safety and I think they should be entitled to set reasonable boundaries on this issue. There could be a case in some bigger public areas to have single-unit lockable gender neutral toilets or changing areas (this is the case in some buildings already).

The number of trans identified people does seem to be very small here, and maybe most of them would be respectful of women, so there is a good chance there have been no instances of problems here up until now. However, there might still be an exploitable weakness in the law that could cause problems and I think it is better to deal with it legally now, than wait until someone is assaulted.

Just in case you think this sort of problem would never arise, this is a story about a sexual predator who managed to access a women's shelter in Canada.

Christopher "Jessica" Hambrook, serial rapist, sexually assaulted and terrorized women after being placed in Toronto area Women's Shelters

<https://gendertrender.wordpress.com/2014/02/16/christopher-jessica-hambrook-serial-rapist-sexually-assaulted-and-terrorized-women-after-being-placed-in-toronto-area-womens-shelters/>

I don't think there should normally be active policing of people getting into changing areas etc, but I think women should be allowed to challenge fully intact biological males who enter these spaces if they are uncomfortable, and the premises ought to be able to legally remove them from the space if this person was causing a problem.

In practice I think if someone wasn't causing any issue they would be left alone, but if the law sided with women it would remove I think any threat of opportunists chancing their arm and having the law side with them.

I think people who have had genital surgery should be allowed to access areas of their chosen gender identity. This should remove any of the opportunists who were just pretending to be transgender to gain access to women in a vulnerable position.

I think there is a chance that there will be a backlash against regular trans-folk if something happens before this issue is sorted out (if there is a loophole in the law that allows intact males to legally enter women's sex-segregated areas).

Now some examples of situations where males invaded women only spaces, or where there are problems in mix-sex toilets, changing areas etc. I am mentioning these as some people mock the idea that a man would pretend to be a woman to enter their space (to be honest, I also thought this until I looked into it).

A lot of these offenders are pure opportunists. Yes, many of these type of people will try this on anyway regardless of the law, but we don't want a weakness in the law that supports them. Again, to use the analogy, would you leave your house or car unlocked on the grounds that there is no point in protecting against burglary?

Man arrested after women sexually assaulted in Bristol OMG nightclub's unisex toilets

A man has been arrested after a number of women were sexually assaulted in a Bristol nightclub.

<http://www.bristolpost.co.uk/news/bristol-news/man-arrested-after-women-sexually-810514>

New Jersey Man Secretly Recorded Women in Fitting Rooms: Police

A 36-year-old man secretly filmed women trying on clothes in the dressing room of a South Jersey Target store, police said Monday.

A victim told police she saw a man's hand creep under her fitting room inside the store, located at 751 South Route 73, on Aug. 9 around 7:41 p.m. The hand was holding a cell phone, she said.

<https://www.nbcphiladelphia.com/news/local/New-Jersey-Man-Secretly-Recorded-Women-in-Fitting-Rooms-Police-440355683.html>

Peeping Tom with lengthy rap sheet accused of looking at women in Target restroom

"Unfortunately this type of activity happens across the country on a daily basis. We were fortunate in this incident that the suspect was able to be detained, that we're able to place more charges on him," said DeBusk.

<http://www.wbir.com/article/news/crime/peeping-tom-with-lengthy-rap-sheet-accused-of-looking-at-woman-in-target-restroom/51-448006062>

"I wanted to see women naked," he was quoted as telling investigators. "Dressing up as a woman was a step to do that."

http://www.upi.com/Odd_News/2003/11/27/Cross-dresser-arrested-in-bath-house/UPI-63871069941991/

As well as the safety issue I think there is a privacy issue. Again I think fully genitally transitioned people wouldn't be an issue for most people, so I think the law should allow for fully genitally transitioned people in these areas.

In thinking about the issue of women's privacy I came across this article which I think expresses it better than I can. This article essentially says that it shouldn't be inferred that just because people are consenting to getting undressed in front of strangers of the same sex, that people are consenting to getting undressed in front of members of the opposite sex (transgender people who are living as their preferred gender, are still biologically of their original sex and can still have functioning testicles and penis, for example. I think fully transitioned people are not the same so I would personally not have a problem with them in the changing areas of their preferred gender).

How erasing sex distinctions from law kills privacy and consent

by Paul Dirks

Consent is a crucial component of privacy that empowers individuals and affirms human dignity. It is consent that permits us to receive and express intimacy. It is consent that regulates our respect for the privacy of others. It is consent that bestows on individuals, rather than society, the power to draw the precise boundaries around their own privacy. — [Steven Wilborn](#)

There is nothing more pivotal in the matter of personal privacy than consent. This is true not only in private places like our own dwellings, but in public places as well: change rooms, locker rooms, shelters, public showers, and camp cabins.

*...When a person steps into a locker room, change room, shelter, or camp cabin, she or he is consenting to a set of unwritten, but well-understood, guidelines. There is no contract, verbal assent, or signature, but consent is given nonetheless, and it is given the moment the person enters through the door marked “Women” or “Men.” In so doing, **they consent not only to remove their clothes, but some of their privacy rights, all in accordance with the meaning of the sign on the door.***

[bit snipped]...Citing *York v. Story* (1963) it continues, “in respect of the interest in not being viewed in states of undress by strangers of the opposite sex, **We cannot conceive of a more basic subject of privacy than the naked body.** The desire to shield one’s unclothed figure from view of strangers, and particularly strangers of the opposite sex, is impelled by elementary self-respect and personal dignity’.”

*More specifically, when a woman enters a change room labeled “women” it is with the expectation that what she will encounter behind those doors is female anatomy. By pushing through that door with that particular sign, she is signaling her consent to be willing to be exposed to breasts and vaginas, among other aspects of the female form. She further consents to baring her body to the eyes of other women, although in this matter she contains a greater amount of control. **But until recently there has been no question that her consent does not extend into willingness to be exposed to penises and other aspects of the male form, nor to be viewed in a state of undress by males.***

*How do transgender policies and legislation, then, interact with a woman’s consent? Effectively, they strip her altogether, leaving her naked, without rights or power under the law to protect her personal dignity or voice. **The sign to the woman’s locker room may still say the same thing, but it no longer has an objective referent. On account of the loss of referent, it no longer communicates anything to her. Because it cannot communicate, she is incapable of consenting.***

...whatever value self-identification may have in other matters relating to gender rights, it has none relative to bodily privacy rights. Bodily privacy is related de facto to the body.

...in order to establish the right of consent with regard to bodily privacy for women who are uncomfortable with male genitalia in their space, we have removed consent from transwomen who may have similar consent concerns.

....

...Secondly, privacy concerns take into account and legitimize the effects of privacy loss. R. v. Golden states that privacy loss can be “humiliating,” “degrading,” “demeaning,” “upsetting,” devastating,” or even be experienced as “visual rape.” Gender policy proponents are happy to claim these effects on behalf of transwomen should they have to use a male space. But if a female should claim these effects if bio-male transwomen were in their space, the effects are seen as illegitimate.”

<https://thefederalist.com/2017/07/11/erasing-sex-distinctions-law-kills-privacy-con>

Problem for women's sports

From what I have read on the TENI website, I think maybe the original Gender Recognition Bill was going to allow for some sex-based exemptions regarding women's sports? I haven't seen the original draft Bill which included these clauses, but maybe it means that in an earlier draft that there was a consideration to allow sports groups to exclude biological males from women's sports?

I know some regulations ought to be up to sporting bodies, but they might need a law to allow for sex based segregated sports and sports competitions, as otherwise a transgender person might take a discrimination case against them if excluded from the sport of the sex they identify with (but of which they are not biologically).

I am concerned that if groups are not allowed to exclude biological males from women's sports that we might end up pushing women out of sports. Sports are sex-segregated in the first place, because men have a lot of physical advantages over women in sports, and for women to have any chance of medalling we need biological sex-based segregation. If biological women stop winning medals in large sporting events it might have the effect of putting girls off even bothering to engage in the sport in the first place. I know we don't have control over international sporting bodies, but we could at least have some influence on our national situation.

There is no safety argument for transwomen in not participating in female sporting event. In fact there is a safety argument for biological females being in a vulnerable position in contact sports such as boxing and rugby. So the only question here is whether we are going to prioritise the “right” of biological males over females in women's sports, or whether we are at least going to allow clubs etc to segregate sports on the basis of biological sex. Some clubs may remove sex-segregation anyway, but they should be allowed not to.

I hope that you will consider introducing an amendment to the Gender Recognition Act allowing some exclusions regarding sports. If exclusions can be made for religious groups, then exclusions can be made for sporting groups as well.

Now for some examples for where biological males entering women's sports has been an issue.

See for example look at this picture of a transgender male in basketball. It is a case of a picture speaking a lot of words.

https://www.google.ie/search?hl=ga&tbn=isch&source=hp&biw=1525&bih=733&ei=A4NvWpTpGo3TwQLNy6qYDA&q=transgender+male+in+basketball&oq=transgender+male+in+basketball&gs_l=img.3...847.5367.0.5629.0.0.0.0.0.0.0.0.0.0.0.0...1ac.1.64.img..0.0.0....0.s.mDoKy76lU#imgc=0b-7sU2TZNdCSM:

or if that link doesn't work the image is here

<https://culturallyboundgender.wordpress.com/2014/06/19/all-the-things-you-cant-deny-title-ix-trans-women-and-the-reality-of-neutrality/>

Another case:

NZ transgender weightlifter creates uneven playing field, says Australia's weightlifting chief

<https://www.stuff.co.nz/sport/other-sports/99233155/new-zealand-transgender-weightlifter-creates-uneven-playing-field-says-australias-weightlifting-chief>

Iranian women's football squad includes eight trans women, report claims

<http://www.pinknews.co.uk/2015/10/02/iranian-womens-football-squad-includes-eight-trans-women-report-claims/>

Women can also be put in danger in some contact sports such as boxing. For example a male transgender person caused serious injury to their female opponent:

"Last night, Fallon Fox's opponent suffered a concussion, broken orbital bone, + required seven staples in her head. 3 mins"

"I've fought a lot of women and have never felt the strength that I felt in a fight as I did that night. I can't answer whether it's because she was born a man or not because I'm not a doctor. I can only say, I've never felt so overpowered ever in my life and I am an abnormally strong female in my own right," she stated. "Her grip was different, I could usually move around in the clinch against other females but couldn't move at all in Fox's clinch."

<http://whoatv.com/exclusive-fallon-foxs-latest-opponent-opens-up-to-whoatv/>

Regarding children and self-identifying as the opposite sex

Comments under:

- a. **Arrangements for children aged 16 to 17 years;**
- b. **Arrangements for children aged under 16 years;**

I am concerned that the law will make it easier for children to self-identify as the opposite sex. I think, to be honest that they may be too young to make this decision at all, however, it would be better left as it is than to make it any easier. This is a major life decision, a bigger one I think than voting. Some young people want to de-transition in later life, so it is better not to make too hasty a decision that has to be reversed later.

I think there should be no legal way for an under 16 year old to change "sex". 16 and over is one thing, but I think under 16 years old would have no concept of this life-changing decision, and are too subject to manipulation by well meaning but misguided adults.

I think most of the support for children “coming out” as transgender is coming from a good place. I used to support letting children fully transition (even medically) myself until I looked into it a bit more. I hadn’t realised that most children become content in their biologically born sex after puberty.

I think there is also a problem in the transgender movement with older males who have "transitioned" (they don’t necessarily get surgery, so are not transitioning in the traditional sense) in later life using children in their campaign for recognition for themselves, and maybe in order to validate themselves.

"A Toronto doctor has raised eyebrows and criticism for writing most transgender-identifying children grow out of those feelings.

And he says the strongest opposition is from adult transgenders intervening in the lives of children of to further their own agenda.

...The great majority (of the kids studied) were gay or lesbian and didn’t have a sex drive yet. They had crushes on the same sex and (being transgendered) was the only way to explain it at the time. By the time they hit puberty, they didn’t feel that way," Cantor said.

<http://torontosun.com/news/local-news/transgenders-grow-out-of-it-doc>

Some concerns about rushing in to “transition” kids too easily from people working in medicine. Some extracts from:

Schools rushing ‘on whisper’ to label pupils as transgender

<https://www.thetimes.co.uk/article/schools-rushing-on-whisper-to-label-pupils-as-transgender-0d8zm53qs>

A psychologist at the only NHS gender clinic for children in England says some may be making choices they could regret

Children as young as 11 are being offered medical treatments that could leave some infertile, according to a psychologist at the only NHS clinic in England and Wales for children seeking to change their gender.

Bernadette Wren, consultant clinical psychologist at the Gender Identity Development Service (GIDS) clinic in London, said some schools were moving too fast in allowing young girls to be treated as male pupils and vice versa — simply at the child's request.

The figure is a 20-fold increase in seven years — in 2009 it was 97. Last year's figures included two three-year-olds, nine four-year-olds, 21 five-year-olds and 23 six-year-olds. Some are being offered treatments not accessible in the past and for which there is no long-term research data available about risks.

Her comments follow remarks by the fertility expert Lord Winston, who said he was seeing transgender adults who had lost their ability to reproduce and were very "damaged".

"In the younger age group we may get kids who are gender fluid but not going to pursue this into later life. That is why we are a little more cautious about early social gender identity," she said.

"Schools might wait for the parents to approach them before changing things like names in the register, uniforms, pronouns, toilets, sports.

"If a school just gets a whisper of a child who may be querying their gender and within minutes they are doing everything to make sure that child is regarded as a member of the opposite sex right from the word go — that may not be the best for that child."

There is an article on some concerns here

The Transgender Experiment on Kids

<https://stephaniedaviesarai.com/the-transgender-experiment-on-kids/>

This is an interesting piece from a teacher in the UK, which might help explain some of the increase in referrals to gender identity clinics, if this is the sort of education children are being taught.:

"I was given 3 lessons on Transgender issues to include as part of the syllabus. The content of these lessons made me feel very uneasy.

The three lessons I was asked to deliver were like something from the 50's in terms of gender stereotypes. Slick animations showed diagrams of boys with mainly blue brains and girls with mainly pink brains. Amongst these pink and blue-brained figures were a minority of boys with pink brains and girls with blue brains. A video interview with a doctor explained that sometimes biology gets it wrong and a boy or a girl will be born with the "wrong" brain in the "wrong" body. But, now it is all ok because medical science can "fix" this and put the right brain in the right body. Interviews with happy trans kids who had taken drugs to stop puberty and were awaiting "gender reassignment" surgery made the whole thing look perfectly ordinary.

*The lesson continued with explanatory diagrams and explanations about how easy it is to change sex now. **Any child who thinks their problems are a result of their being in the "wrong" body is encouraged to explore gender reassignment as a possible solution.** There was no mention of any side effects or of the long-term consequences of taking such an important step....These lessons are now part of the syllabus in most secondary schools I have taught in. I wonder if parents are aware of this. I wonder if this is perhaps the reason there are now so many more young people presenting for gender reassignment"*

Above quotes from

<https://www.transgendertrend.com/teaching-transgender-doctrine-in-schools-a-bizarre-educational-experiment/>

Children and suicide claims

There is a chance you are going to get submissions making hyperbolic claims about suicide risk in young trans-identified people. The numbers often quoted are not based on solid ground. Here are some critiques of commonly used statistics.

[A Scientist Reviews Transgender Suicide Stats](https://www.transgendertrend.com/a-scientist-reviews-transgender-suicide-stats/)

<https://www.transgendertrend.com/a-scientist-reviews-transgender-suicide-stats/>

The Suicide Myth

<https://www.transgendertrend.com/the-suicide-myth/>

And on adults and suicide risks:

The 41% trans suicide attempt rate: A tale of flawed data and lazy journalists

<https://4thwavenow.com/2015/08/03/the-41-trans-suicide-rate-a-tale-of-flawed-data-and-lazy-journalists/>

Comments under: (C)Arrangements for persons who identify as neither male nor female (e.g. non-binary);

I really hope there won't be legislation to give legal standing to this nebulous concept.

I think there should be an intersex option to tick on forms, if people who are intersex want this. Intersex is not a concept in someone's head, it is a provable thing based on biological reality.

But I think using vague terms like non-binary, which might mean different things to different people, should not be encouraged. It seems to mostly refer to people who just don't feel comfortable with being pigeonholed into stereotyped gender roles for their biological sex. I would argue that most people don't feel comfortable with rigid stereotypes for their sex, so by this way of thinking are also non-binary.

What advantage is it to the government to have people tick "non-binary" on a form, when it doesn't give us any useful information? Sometimes it is relevant whether someone's sex is male or female, but if people were given a non-binary option a lot of people might pick this, as they don't feel comfortable with sex-based stereotypes, but this will mean the government might not have useful information about what biological sex someone is (say in regards to accessing health services, pay, education, or on the census).

Some people claim that there are over 60 genders. Is the government going to have to have forms with a list of all these "genders" for people to tick on any official forms? This is potentially a bottomless pit as it is not based on objective reality.

I think people are trying to be kind and inclusive with some of these concepts, but I don't think the government should codify every nebulous concept in law.

In conclusion

As I hoped I made clear above, my own main concerns are with the (mental and physical) health of children and women's safety and rights.

I don't agree with having a system of self-identification without having to undergo any medical treatment. However, if we are going to have a system of self-identification, I think there needs to be exceptions made in some areas, where only medically transitioned people can legally have a right to certain services. In regard to sports, sporting groups ought to be able to sex-segregate based on the biological sex someone was born into.

Thank you for taking the time to read this submission. It is not as thorough as I would like as I only found out about the consultation by chance about a week ago.

My email is **REMOVED** should you require further information.

Name & Address Removed