



Royal College
of Nursing
Scotland

**RCN Scotland's response to the Healthcare
Improvement Scotland (HIS) consultation on**

Gender Identity Healthcare Standards

11 March 2024

Introduction

The Royal College of Nursing (RCN) is the world's largest nursing union and professional body. It is the leading national and international authority in representing the nursing profession. We represent over half a million nurses, student nurses, midwives, nursing associates and nursing support workers in the UK and internationally.

The RCN has over 48,500 members in Scotland. We campaign on issues of concern to nursing staff and patients, influence health policy development and implementation, and promote excellence in nursing practice.

Background

There has been an increase in the number of people wishing to access specialist gender identity services in Scotland. There is recognition that services in Scotland would benefit from the development of national standards for gender identity healthcare. Scottish Government has committed to improving access to, and delivery of, gender identity services in Scotland. As part of this work, in September 2022, Healthcare Improvement Scotland was commissioned to develop national standards for adult and young people's gender identity services.

Consultation questions and RCN Scotland responses

General comments

RCN Scotland response:

RCN Scotland notes that the standards seek to enhance improvements in health and social care for those seeking to access specialist services in an area where demand has significantly increased in recent years. This change has been accompanied by increased public discussion and debate, which has unfortunately become controversial and divisive at times. Given this context, these Standards have been drafted in a sensitive way and appear to be, in general, comprehensive and clearly worded.

RCN Scotland members want to provide the best health and social care for everyone, regardless of their age, sex, sexual orientation or gender identity. However, we have heard from some members that, partly due to the divisive public debate, some staff shy away from discussion about gender for fear of saying the wrong thing or through a lack of confidence in their own understanding. Staff training and support is an issue which the Standards seek to address and this is welcome, however more needs to be done to ensure staff feel informed and confident in discussing gender identity healthcare.

The Standards are also drafted in the context of a nursing workforce crisis across health

and social care – the NHS alone has more than 3,700 registered nurse vacancies. Waiting times for gender identity clinics have reportedly risen significantly as more people seek to access the service¹. Given these pressures, it will be incredibly difficult for health and social care providers to meet many of these standards, most notably Standards 2, 3, 6, 7 and 8, without significant investment in staffing and additional services and pathways.

It is also important to consider that there are nursing staff who have or will want to access gender identity services. They not only require support from their employers, but may also be able to play a role in providing guidance and support to peers.

Comments on Standard 1: People are supported to make informed and shared decisions about their care.

RCN Scotland response:

We have no comments about Standard 1.

Comments on Standard 2: Organisations actively work to reduce inequalities in accessing and delivering gender identity services.

RCN Scotland response:

Pressures on services are resulting in significant waiting times, which vary across Scotland due to the geographic spread of services and therefore can contribute to inequalities. There is a concern that some people may seek private services or seek to self-medicate, which could potentially exacerbate inequalities too.

This increase in waiting times does however perhaps highlight an increase in confidence in people seeking help with regards to their gender issues.

Comments on Standard 3: People have timely, equitable, consistent and person-centred access to gender identity healthcare.

RCN Scotland response:

As discussed above, pressures on services make meeting this Standard difficult. It is difficult to argue that people have “timely” or “consistent” access to gender identity healthcare currently and greater investment in services and importantly in staff, will be required to meet this Standard. As the Standard requires clear and accessible information about services to be readily available, raised awareness will likely result in further increases in demand for gender identity healthcare services.

Comments on Standard 4: Organisations demonstrate effective and collaborative leadership, governance and partnership working in the planning, management and delivery of gender identity healthcare.

RCN Scotland response:

This Standard would benefit from further consideration of both documenting and reporting requirements in order to embed these Standards into wider governance structures. As part of continuous quality improvement and assurance there is a need to be able to identify where improvement is happening and also manage complaints in relation to services to make improvements.

Comments on Standard 5: Staff have the training and skills to deliver the right care and support for people accessing gender identity services.

RCN Scotland response:

RCN Scotland views this Standard as key to improving services. Current levels of awareness and understanding of gender identity services, of staff not directly involved in those services needs to be improved. Staff need to be able to access formal training, including protected time to do so, and the Standard would benefit from making this clear. There is also a need to consider specific consideration with regards to specific training within the pre-registration nursing programme.

We note and welcome the reference to the RCN's Fair Care for trans people guidance² in this Standard. This guide is currently under review and so we trust that the Standards will be reviewed as and when evidence and resources are updated.

We note the reference to the NES Transgender Care Knowledge and Skills Framework within this Standard, this section may benefit from reference to any other educational resources linked to the Framework.

Comments on Standard 6: Organisations ensure there is a robust referral pathway into specialist gender identity services.

RCN Scotland response:

In the absence of guidance for all staff who refer people to services, it is important that there is uniformity to build this robustness, and ensure that people are appropriately being referred. There is a need, in particular, for Primary Care services to have improved understanding and sufficient information about referral pathways into specialist gender identity services.

Comments on Standard 7: Young people have timely access to safe, high-quality and person-centred gender identity services which understand, respect and uphold their rights.

RCN Scotland response:

Noting that this is the only standard which applies specifically to younger people, we would question whether there needs to be greater thought given to whether the Standards sufficiently cover the specific needs of young people.

At the least, there is a need to acknowledge the importance of timely access to services for young people and the specific educational requirements for staff working with young people. This Standard could more explicitly explore the importance of involvement and support for a young person's wider support network, including where appropriate parents and carers.

Comments on Standard 8: People have a holistic, effective and person-centred assessment and care plan.

RCN Scotland response:

We have no comment, beyond the points raised above about pressures on services making it difficult to meet this Standard.

References

¹ 'Why are transgender healthcare waiting times so long?', BBC News Scotland, <https://www.bbc.co.uk/news/uk-scotland-68304933> (Accessed 11 March 2024)

² Fair Care for Trans and Non-binary People, RCN Scotland, <https://www.rcn.org.uk/Professional-Development/publications/rcn-fair-care-trans-nonbinary-uk-pub-009430> (Accessed 11 March 2024)



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Published: 11 March 2024