

GMC response to Healthcare Improvement Scotland's consultation on Gender identity healthcare services standards

February 2024

Our response

Sent via email

I am writing to you following the publication of your consultation on Gender identity healthcare services standards to provide a brief response advising amendments to references made to our [trans healthcare](#) ethical hub page. Given the focused nature of our response, we felt it was more appropriate to email rather than submitting our response via the survey.

In general, the standards highlighted within the consultation fall in line with our [professional standards](#) and we are pleased to see the section on shared decision making, which is a focus of our [Decision making and consent](#) guidance. Furthermore, we have not identified anything within the Gender Identity Healthcare standards that may contradict with the high-level standards we provide.

We welcome the commitment to collaborative leadership within the standards, given our organisational priority of fostering everyday leadership within the medical profession.

We're grateful to you for referencing our *trans healthcare* ethical hub page at footnote 19 in the [draft standards](#). However, on pages 13 and 37, the advice we provide is referred to as 'professional and good practice guidance' and 'professional guidance' respectively. As such, we want to clarify that the information and advice we signpost to on the ethical hub is not 'guidance' and cannot be described as such. The aim of our *trans healthcare* ethical hub page is to illustrate how the broad principles from our [professional standards](#) may be applied in practice when caring for transgender and gender diverse adults, as well as signposting to relevant external information and resources. When we use the term 'professional standards' we mean *Good medical practice* and the more detailed guidance.

As with all our ethical hub pages, our *trans healthcare* page does not set new professional standards and is not intended to replace the standards we provide. We would therefore be most grateful if the references to our *trans healthcare* ethical hub page could make clear that it is advice not guidance.

Secondly – a small point to note is that at footnote 19, it appears to list the *trans healthcare* page as having been published in 2019. To confirm, the page was recently updated and was published in March 2023.

Finally – for information – it may also be useful to confirm that the advice we provide on our *trans healthcare* page is written for doctors treating adult patients and does not include advice on the treatment of children and young people. On the page, we signpost externally to relevant information and processes in Scotland, England, Wales and Northern Ireland, as well as listing our professional standards that apply to all doctors across all specialties treating children and young people.

For awareness, but not for addition to your draft standards, we have linked below to several pieces of our guidance that may be useful and have particular relevance to some of your draft standards.

These include:

- [*Good medical practice \(2024\)*](#)
- [*Decision making and consent*](#)
- [*Leadership and management for all doctors*](#)
- [*Good practice in prescribing and managing medicines and devices*](#)
- [*Confidentiality: good practice in handling patient information*](#)
- [*0–18 years: guidance for all doctors*](#)

Please let me know if you have any questions.