In December 2019, as part of a group of eighty quantitative social scientists, we signed a [letter](#) calling on the UK census authorities to reconsider proposed guidance for the next census which reframes the longstanding sex question as one about self-declared gender identity. We know from our work that sex remains a key determinant of outcomes across the full spectrum of public policy areas from health and education to criminal justice and employment.

In that letter, we also made clear our support for the new, separate question on gender identity that will feature in the census in England, Wales and Scotland, given we have no robust data on the size and distribution of the population claiming a transgender identity. We note, however, that responses from these questions can only be understood in combination with good data on sex registered at birth.

In a recent [interview](#) (BBC R4 Today, 22 January), the Chief Statistician Sir Ian Diamond indicated that the sex question in the census will be based on sex, as recorded on a person's birth certificate. We have however since learnt that the Office for National Statistics (ONS) remains strongly wedded to using some form of 'self-identification' guidance that goes beyond this simple factual definition.

We are very concerned about the potential impact of framing the sex question in this way on data quality, in particular for subgroups of the population, given that there is sufficient evidence already to suggest that those with transgender identities are likely to be concentrated in younger age groups and differ by sex, as registered at birth.

Despite our best efforts to have an evidence-led discussion, senior officials at ONS have failed to provide any reassurance that the decision-making process underpinning their approach to the development of guidance for the sex question is robust. We have been disturbed to be confronted with arguments that have shifted and twisted under challenge, an inability to provide evidence of the requisite underpinning research and analysis, and a process of engagement by ONS with academic users that been less enthusiastic than we would have expected.

This week also sees the deadline for a consultation on [draft guidance](#) on collecting data on sex and gender identity, produced by the Scottish Government's Chief Statistician.

Developed in conjunction with a [working group](#) that consisted entirely of representatives of organisations that have already introduced policies based on gender self-identification, including ONS officials, the Scottish Chief Statistician is recommending ceasing to collect data on biological sex in favour of data on gender identity in almost all circumstances. The proposal has once again been presented without providing the rationale or evidence that such a major change demands.

This means two of the UK's most senior governmental Chief Statisticians are proposing to abandon the principle of collecting data on biological sex. Further, both have indicated that to collect data on biological sex may breach privacy rights, and be unlawful. We believe this

claim to be overstated. It is not supported by a [formal legal opinion](#) on the legality of collecting data on biological sex by Aidan O'Neill QC. We also note that no such arguments are being made in relation to other characteristics that pertain to a person's biology, such as age or health.

It is our strong view that the burden of proof remains with the respective Chief Statisticians to articulate why data on biological sex is no longer salient to our ability to measure and remedy phenomena that we expect public policy to address. Both have singularly failed to do so.

We therefore feel it our duty to put on the public record our deep-seated alarm that we are on the brink of losing robust, high quality data on sex in the UK, and that the public servants leading this process have failed to engage in a serious and timely way with those outside government who have substantial expertise on the collection and use of population data in the social sciences.

Nick Allum, Professor of Research Methodology, University of Essex
Tarani Chandola, Professor of Medical Sociology, University of Manchester
Dr Amanda Gosling, Senior Lecturer in Economics, University of Kent
Colin Mills, Professorial Fellow, Nuffield College, University of Oxford
Lindsay Paterson, FBA, Professor of Education Policy, University of Edinburgh
Alice Sullivan, Professor of Sociology, University College London