

Letter of concern regarding the loss of sex-based data in education

To: Nick Gibb, Minister for State for Schools; Robert Halfon, Minister for Skills, Apprenticeships and Higher Education; Claire Coutinho, Minister for Children, Families and Wellbeing; Baroness Barran, Minister for the School System and Student Finance.

CC: Clare Marchant, CEO UCAS; Jill Duffy CEO OCR; Ian Morgan Chair JCQ; Baroness Kishwer Falkner EHRC; Ed Humpherson, Office for Statistics Regulation; Professor Alison Park, Interim Chair Economic and Social Research Council; Jeremy Miles, Minister for Education and Welsh Language, Welsh Government; Shirley-Anne Somerville, Cabinet Secretary for Education and Skills, Scottish Government; Michelle McIlveen, Minister for Education Northern Ireland Executive.

Dear DfE Ministerial Team,

We are writing to express our concern about the erosion of sex-based data in education, and to ask ministers to ensure that data on sex is included in all data collection and reporting on schools, testing, public examinations and university applications and admissions.

Sex is a vital variable in education research, including in research on attainment, subject choice, and university admissions. The intersection of sex with other variables of interest such as social class and ethnic group is an essential component of research on both education and related questions such as social mobility.

Education researchers often assess phenomena with large sex differentials, to help inform policy. For example, there have been various educational initiatives aimed at increasing the proportion of women among higher education students who take degrees in STEMM subjects (Science, Technology, Engineering, Mathematics and Medicine). A lack of accurate data on sex will make it impossible to track trends over time with sufficient reliability to assess the success or failure of such interventions. Research on low attainment and representation among [working class boys and men](#) will also be affected by a lack of accurate sex data.

The prevalence of trans identities has increased markedly among highly educated young people, especially girls. The American College Health Association have [reported that](#) in 2008, one in 2,000 female undergraduates (0.05%) in the US identified as transgender, but by 2021, this had risen to one-in-twenty (5%). Data on sex as well as gender identity is essential to understanding the experiences of this group.

Both education and sex are central variables in many research fields, from social mobility to health. Linked administrative data on education is used across a range of research areas. The quantitative research community as a whole has an interest in the accurate recording of sex-based data in education.

Sex, Gender and Gender Identity

Some data providers have [conflated](#) three distinct concepts: [sex, gender and gender identity](#). Sex is a biological variable, determined at conception, referring to the two human reproductive classes, male and female. Some social scientists define gender as a social category, referring to the stereotypes and roles that may be imposed on males and females, according to their sex. Gender identity refers to

how individuals see themselves, rather than how others see them. The concept of gender identity is evolving, and includes non-binary as well as cross-sex and other identities.

To add to the confusion, not only is gender commonly used as a [polite synonym](#) for sex, but the terms gender and gender identity are often used interchangeably.

In data collection, it is vital to ensure that terminology is clear and universally understood, and that each question is constructed to elicit clear and distinct information.

UCAS

UCAS currently collect data on 'gender' rather than sex, though they confuse the concepts of sex and gender identity in their question. It is not clear when the guidance on this question re-framing the question as relating to identity rather than sex was introduced, or what consultation if any was carried out at the time.

*"Gender: Select the gender you most identify with at this time. You can tell the university or college directly if you'd feel more comfortable identifying in another way, or if this changes.
Male/Female"*

UCAS have informed applicants in the 2023 cycle that they are considering changing the 'gender' question to the following:

*"Gender: Select the gender question you most identify with at this time. You can tell the university or college directly if you'd feel more comfortable identifying in another way, or if this changes.
Man/Woman/I prefer to use another term/I prefer not to say"*

Both of these questions are poorly constructed if they are intended to capture gender identity. Rather, they seem to fudge gender identity and sex into one question. The suggested question gives no indication of whether respondents identify as trans, so will not facilitate equalities monitoring or research according to trans status or gender reassignment.

It is vital that UCAS should collect data on sex, preferably alongside a distinct and properly constructed question on gender identity.

UCAS is the only source of data on applicants and therefore applicants' patterns of activity and success rates. Sex disaggregated data at the level of individual courses at individual institutions at the application stage is essential. Sex-disaggregated UCAS data is irreplaceable, and we cannot emphasise strongly enough how important this is for researchers and for equalities monitoring.

Examination boards

Alongside this loss of sex-based data on Higher Education applications, we are also concerned that examination boards are moving away from recording data on the sex of students taking GCSEs and A levels. It has been [reported](#) that the Joint Council for Qualifications (JQC) are considering conflating sex with gender identity by introducing a non-binary category alongside the sex categories "male" and "female". Yet non-binary pupils also have a sex. It would be useful to record students' gender identities, but this should be in addition to, not instead of, their sex, and the two variables must not

be conflated. The JSCs thinking has reportedly been influenced by the lobby group Stonewall, which opposes data collection on sex. We are not aware of any consultation by JSC or DfE with quantitative users of education data.

Scientific and legal frameworks

The UK Statistics Authority has recently published [guidance](#) that recommends that “sex, age and ethnic group should be routinely collected and reported in all administrative data and in-service process data, including statistics collected within health and care settings and by police, courts and prisons”. It also says data producers should clearly distinguish between sex, gender and gender identity.

Under EA2010, public bodies, including schools and universities, have a Public Sector Equality Duty to monitor and publish data on the protected characteristic of sex, which is vital for equalities monitoring. In practice, public bodies are sometimes reliant on quangos to record this data, as in the case of universities relying on UCAS to record the sex of applicants across the sector. UCAS should be aware that [Advance HE](#) have reverted to collecting data on sex in order to comply with the PSED.

The UN Committee for the Elimination of Discrimination Against Women (CEDAW) framework is also relevant. In a rebuke to the Scottish Government, the UN Special Rapporteur for Violence against Women and Girls has [drawn attention](#) to the fact that the failure to collect data on sex violates article 2 of CEDAW according to which state parties should “provide for mechanisms that collect relevant sex-disaggregated data, enable effective monitoring, facilitate continuing evaluation...”.

The shift away from collecting accurate data on sex has occurred without transparency or consultation with relevant experts. We believe that ministerial intervention is now necessary to restore data collection on sex.

We would welcome an opportunity to discuss these issues with you.

Signed:

Professor Alice Sullivan, Professor of Sociology, UCL.

Dr Adriana Duta, Lecturer in Quantitative Methods, Moray House School of Education and Sport, University of Edinburgh

Dr Alexander Weiss, Senior Lecturer in Psychology, University of Edinburgh

Professor Alice Brown, CBE, FRSE, AcSS, FRCP of Edin, FRSA, Cipfa (Hon), Emerita Professor of Politics at the University of Edinburgh and Chancellor of the University of Abertay, Scottish Public Services Ombudsman, 2002-9.

Professor Alison Koslowski, Director Thomas Coram Research Institute, UCL

Professor Almudena Sevilla, Professor in Economics and Public Policy LSE and Chair of the Royal Economic Society Women's Committee

Professor Alun Hughes, Professor of Cardiovascular Physiology and Pharmacology, Head of the Department of Population Science & Experimental Medicine in the UCL Institute of Cardiovascular Science, and Associate Director of the MRC Unit for Lifelong Health and Ageing, UCL

Dr Amanda Gosling, Senior Lecturer in Economics, University of Kent

Professor Amanda Sacker, Professor of Life Course Studies, UCL

Dr Arjan Gjonça, Associate Professor of Demography, LSE

Dr Augustin de Coulon, Senior Lecturer in Economics, Kings College London

Brian Dodgeon, Research Fellow, UCL Department of Social Science
Charlie Owen, Principal Research Associate, UCL Department of Social Science.
Dr Chris Playford, Senior Lecturer in Sociology, University of Exeter
Professor Chris Taylor, Professor of Social Sciences, Cardiff University
Professor Christiaan Monden, Professor of Sociology & Demography, University of Oxford
Professor Colin Crouch, FBA, AcSS, Professor Emeritus, University of Warwick
Professor Colin Mills, Associate Professor of Sociology, University of Oxford
Professor Cristina Iannelli, Chair of Education and Social Stratification, University of Edinburgh
Dr David Bann, Associate Professor in Population Health, UCL
Professor David Gordon, FBA, Professor of Social Justice, University of Bristol
Professor David Voas, Professor of Social Science, UCL
Professor Dick Wiggins, Professor in Quantitative Social Science, UCL
Professor Diego Gambetta, FBA, Carlo Alberto Chair in Social Science, Fondazione Collegio Carlo Alberto, Turin, Italy, Emeritus Fellow, Nuffield College, Oxford
Professor Emla Fitzsimons, Professor of Economics and Director, Millennium Cohort Study, UCL
Professor Fiona Steele, OBE, FBA, Professor of Statistics, LSE.
Professor Francis Green, Professor of Work and Education Economics, UCL
Professor Gabriella Conti, Professor in Economics, UCL
Dr Gale Macleod, Senior Lecturer in Education, University of Edinburgh
Dr Gillian Young, Director Newhaven Research Scotland, Honorary Research Fellow, Heriot-Watt University
Professor Glen Bramley, Professor of Urban Studies and Fellow of the Academy of Social Sciences, Herriot Watt University
Professor Hazel Inskip, Professor of Statistical Epidemiology and Deputy Director MRC Lifecourse Epidemiology Unit, University of Southampton.
Professor Ingrid Schoon, Professor of Human Development and Social Policy, University College London
Professor Jacqueline Scott, Emerita Professor of Empirical Sociology, University of Cambridge
Professor Janice Baird, Professor of Public Health and Epidemiology, University of Southampton
Professor Jan O. Jonsson, Professor of Sociology, University of Oxford
John Goldthorpe, CBE, FBA, Emeritus Fellow in Sociology, Nuffield College, University of Oxford
Professor Jonathan Bradshaw CBE, FBA, Emeritus Professor of Social Policy, University of York.
Professor Karen Bloor, Professor of Health Economics and Policy, University of York
Professor Kathy Sylva, OBE, FBA, FAcSS, Professor of Educational Psychology, University of Oxford
Professor Kirstine Hansen, Professor of Social Policy, UCL
Professor Leon Feinstein, Professor of Education and Children's Social Care, University of Oxford, and Director of the Rees Centre.
Professor Lindsay Paterson, FBA, Professor of Education Policy, University of Edinburgh
Professor Lucinda Platt, Professor of Social Policy and Sociology, LSE
Dr Luke Buchanan-Hodgman, Senior Lecturer in Economics, University of Kent
Professor Maria Sobolewska, FRSA, Professor of Political Science, University of Manchester
Professor Mel Bartley, FBA, Professor Emerita of Medical Sociology, UCL
Dr Michael Biggs, Associate Professor in Sociology, University of Oxford
Dr Michael Rosie, Senior Lecturer in Sociology, University of Edinburgh
Dr Michelle Luciano, Reader in Psychology, Edinburgh University
Professor Miguel León-Ledesma, Professor of Economics, University of Kent
Professor Nan Dirk de Graaf, Professor of Sociology, University of Oxford
Professor Nick Bailey, FRSA, Professor of Urban Studies, University of Glasgow

Professor Paul Clarke, Professor of Social Statistics, Institute for Social & Economic Research, University of Essex
Dr Paul Norman, Associate Professor Population & Health Geography, University of Leeds
Professor Rebecca Hardy, Professor of Epidemiology and Medical Statistics, University of Loughborough
Professor Richard Cookson, Professor at the Centre for Health Economics, University of York
Professor Rob Ford, Professor of Political Science, University of Manchester
Dr Roxanne Connelly, Senior Lecturer in Sociology and Quantitative Methods, University of Edinburgh
Dr Samantha Parsons, Research Fellow, UCL
Professor Stephen Gorard, Professor of Education and Public Policy, University of Durham
Professor Stephen Jenkins, Professor of Economic and Social Policy, LSE
Professor Steve Strand, Professor of Education, University of Oxford
Professor Susan McVie, OBE, FRSE, Professor of Quantitative Criminology, University of Edinburgh
Professor Suzanne Fitzpatrick, Professor of Housing and Social Policy, Heriot-Watt University
Professor Tak Wing Chan, Professor in Quantitative Social Science, UCL
Professor Tarani Chandola, Professor of Medical Sociology, University of Manchester
Professor Tim Doran, Professor of Health Policy, University of York
Professor Vikki Boliver, Professor of Sociology, University of Durham

6 additional signatories are redacted from this public version of the letter.

