

Parliamentary briefing, 20th March 2025

## The Sullivan Review

The Sullivan Review of data, statistics and research on sex and gender<sup>1</sup> has been published by the Department for Science, Innovation and Technology (DSIT). The review by Professor Alice Sullivan of University College London sets out in careful detail the grave problems with official data in areas including health, justice, education and the economy.

**Many public bodies, including the NHS and the police, have stopped collecting data on sex, often replacing it with self-declared gender identity or by a confused, undefined hybrid of gender identity and sex.**

The Sullivan Review, which is backed by independent legal advice, makes recommendations that data on sex should be collected by default in all research and data collection commissioned by public bodies. It focuses on data collection that supports scientific research and effective policy-making, but also highlights the operational risks caused by ambiguous data. In some cases, the loss of data on sex poses risks to individual's healthcare and safeguarding.

The Secretary of State for Health and Social Care has already said<sup>2</sup> that he will act on the findings. "The Sullivan Review underlines the importance of recording biological sex – not just for research and insight, but also patient safety. Doing so does not prevent us from recording, recognising and respecting people's gender identity where these differ."

## The Data (Use and Access) Bill

In an age of shareable digital data, keeping sex records accurate and not confusing them with gender identity requires a government-wide solution with clear data standards.

The Data (Use and Access) Bill<sup>3</sup> can provide this. It includes a trustmark for "services consisting of the use of information to ascertain and verify facts about individuals", which will provide the basis for **digital verification services** underpinned by authoritative data from public authorities.

## The opportunity

Digital verification services offer the potential to solve the problem of unreliable sex data by setting clear data standards linked to robust sources (such as the digitised birth register and accurate health records), ensuring that where a person consents to share data on their sex it is accurate and clear – and where they do not consent, it is not shared.

But unreliable records such as those from the Passport Office and DVLA (which allow people to change their recorded sex on request) must be excluded from the data.

The shift from paper documentation to digital verification services provides both the imperative and the opportunity for the government to solve the problem of confusion about "sex" and "gender", and bring recording of personal information on sex into line with **data protection principles** including accuracy, minimisation, integrity and confidentiality.

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<sup>1</sup> HM Government (2025). *Independent review of data, statistics and research on sex and gender*.

<sup>2</sup> Wes Streeting (2025). [Post on X \(Twitter\). @wesstreeting, 20th March 2025](#).

<sup>3</sup> UK Parliament (2025). [Data \(Use and Access\) Bill \[HL\], 3825](#).

## The problem

The current design of the government's digital verification services assumes that data held by public bodies is authoritative and reliable. It should be, but currently, as set out in the Sullivan Review, it is not. Public sources routinely conflate and confuse sex and gender identity. This harms the privacy and safety of transgender people and others.

Personal identity records such as passports and driving licences (and the corresponding records held by the Passport Office and DVLA) do not record sex accurately, since people can change their information from "M" to "F" with a simple request, and no records are kept of those changes. The census suggests that as many as 100,000 people may have changed the sex recorded in some of these documents. The change does not require surgery, diagnosis or a gender-recognition certificate. It is "gender self-id".

This means that no-one's sex can be accurately validated from these sources, which are likely to provide the most common bedrock for verifying basic facts about a person within the digital identity system.

## The solution

Digital verification services can solve the problem of providing both accuracy and privacy, but only if the government establishes this as a clear policy goal. To avoid chaos and grasp opportunity, the government needs to recognise the need for accurate sex data, and **incorporate this in the trust framework**.

Recording sex accurately where it is needed and sharing it *with consent* is not incompatible with human rights or with the **Gender Recognition Act**. The GRA was enacted in response to the decisions of the Strasbourg Court in *Goodwin v United Kingdom* (2002) 35 EHRR, which held that the UK government breached **Article 8** when a transgender person was forced to reveal their sex when showing identifying documents in situations such as opening a bank account. This is a problem of an analogue world. Digital data systems can **treat each attribute separately, with privacy and consent built in**, solving the Article 8 problem without corrupting data or breaching the GRA.

## Legislative amendments to the Data Bill

During the Lords stage of the bill, a set of legislative amendments was introduced to secure the accuracy of personal data from public sources and ensure that digital ID is not gender self-ID. These were removed during the committee stage in the Commons, based on the misunderstanding that they would result in people's data being shared without their consent.

The **Secretary of State for Science, Innovation and Technology**, the department that has published the Sullivan Review, should now commit to solving the problem that it exposes, and to do this through the framework for digital verification services in the bill.

A set of amendments should be reintroduced to ensure that when sex is recorded and shared within digital verification services **it is defined clearly and can be verified accurately**.

This would be a low-cost measure to ensure the system works for its intended purpose, which is to allow people to verify facts about themselves in order to access relevant public and private services. **Sex matters especially in areas such as health, social care, women's services, sport, safeguarding and single-sex services and associations**. This is supported by the Equality Act 2010.

For more information see [sex-matters.org/campaigns/digital](https://sex-matters.org/campaigns/digital)  
Or contact Laura Pascal at Sex Matters: [PublicAffairs@sex-matters.org](mailto:PublicAffairs@sex-matters.org)



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## Redaction Summary

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