



---

**Ed Humpherson, Director General for Regulation**

Paul Lowe  
Chief Executive  
National Records of Scotland  
(by email)

16 September 2021

Dear Paul,

**Guidance for the sex question in Scotland's Census**

I am writing given the announcement of the decision on Scotland's Census sex question guidance.

Based on our previous discussions, I was pleased to hear you were undertaking a review of the Census sex question guidance, given the changes made to the other Censuses in the UK. The outcome of this review has resulted in National Records of Scotland (NRS) confirming its guidance wording which includes the fact that people may self-identify when answering the sex question. While we appreciate this decision has been made in a timely fashion – in advance of Census day in March 2022 – little detail has been published by NRS as to the considerations made in finalising this guidance as part of that review.

My interest, of course, is how the outcome will impact Census data and statistics; how you have taken account of any data quality considerations including the comparability of data across the rest of the UK; and how you have communicated and assured users and stakeholders on these points.

Given the importance of the decision for the Census, and potentially a wider range of data and statistics in Scotland, I recommend you:

- Ensure NRS's decision-making and judgements as part of the review are clearly communicated.
- Refresh and update existing documentation where appropriate, to reflect any changes to matters such as comparability and how your decisions best meet user needs and serve the public good.
- Identify and mitigate any outstanding risks to Census live operations in relation to this question in a timely fashion.
- Consider any possible implications for data quality and make plans to monitor and review this through Census operations. Users and stakeholders should be provided with analysis and paradata to assure them of data quality and support appropriate use of Census data.

My team will continue to engage with NRS as part of broader Census assessment activities and I appreciate your continued engagement with the Office for Statistics Regulation as you prepare for Census day in March 2022.

I look forward to hearing from you in response to this letter by Thursday 30 September.

Yours sincerely,



Ed Humpherson  
Director General for Regulation