



Chairs/Steering Group  
Seen in Health Network  
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28 January 2025

Dear Mr Humpherson,

**Re: Request to declassify NHS staff survey data**

We are grateful to the Office for Statistics Regulation (OSR) for their thorough consideration of the issues we raised regarding the NHS 2024 staff survey, a summary of which can be seen [on our website](#).

We value the OSR's recommendation that clearer guidance and definitions are provided in future surveys, and crucially, welcome the commitment by NHS England to improve their data collection standards. We note that the data collected in the staff survey is not officially accredited, so no accreditation can be removed, but hope the OSR's continued engagement with NHS England will help ensure lessons are swiftly learned. Whilst the 2024 staff survey cannot be amended, the internal NHS England 2025 staff survey is due to launch imminently. Immediate steps can, and should, therefore be taken to review and alter questions which undermine the clarity, accuracy and quality of data being sought.

The NHS has 1.5 million staff and is the biggest employer in Europe. There is a level of rigour that patients and staff alike can expect to be applied when a workforce survey is undertaken in an organisation of this scale, yet inaccurate data collection leaves the NHS unable to monitor protected characteristics accurately to prevent discrimination. We will continue to raise concerns where the distinct concepts of sex and gender identity are used interchangeably or wrongly conflated, recognising this occurs to the detriment of staff, patients and the credibility of the organisation as a whole. We note

the OSR's recommendation that concerns regarding compliance with the Public Sector Equality Duty (PSED) are raised directly with the Equality and Human Rights Commission (EHRC). This will be actioned as a matter of priority.

As a staff network, our preference is always to engage proactively and positively to support our colleagues, leaders and associated stakeholders in their respective efforts to ensure the NHS is a safe, lawful workplace. The concerns SEEN in Health have raised here are not limited to England, and we would encourage staff across the devolved nations to highlight similar problems where apparent in the Scottish, Welsh and Northern Irish workforce surveys, with reference to the OSR's letter in survey responses where helpful.

We look forward to NHS England implementing the necessary changes to meet its obligations under equality legislation, and ensuring, at a minimum, accuracy in data collection.

Kind regards,

**SEEN in Health Chairs**