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Sir Ian Diamond FBA  
National Statistician

30 October 2020

Dear Ian,

I am writing in my capacity as Chair of the [UK Statistics Authority's Methodological Assurance Review Panel for the Census](#). I recently received a letter from eleven signatories on the subject of the sex question in the Census. The letter is [in the public domain](#) and is also attached. The authors also refer to a [previous communication](#) signed by six of its signatories and 74 other social scientists.

Both communications express concerns about the proposed guidance for the mandatory sex question in the Census.

#### **The role of the Methodological Assurance Panel ("the Panel")**

The Panel has reflected on its own role in matters of this kind, as laid down in its [terms of reference](#). The review that we are carrying out, independently of the Office for National Statistics, is intended among other things "to provide assurance to the National Statistician that .. the statistics resulting from the 2021 Census will meet the code of practice for official statistics and therefore can be badged as National Statistics." The actual determination as to whether or not any statistics can be badged as National Statistics rests with the Office for Statistics Regulation, not with us; our role is to advise the National Statistician.

The Panel is continually advising on specific aspects of methodology; in other contexts, for example on questions relating to work, it has already been involved in considering whether the wording of guidance accurately reflects the ONS's stated aims. The code of practice also encapsulates certain process issues, and because these are part of the research leading up to the census, these are also part of our remit, at least within broad parameters.

#### **The guidance on the sex question: specific tasks for the Panel**

The Panel takes no view on what is the "right" definition of sex for the Census.

In line with the code of practice's requirement for "transparent judgements about definitions and methods" it is necessary for ONS to come to a clear view of what definition it wishes respondents to

use. The Panel is expecting an opportunity to comment on the guidance in the light of that view, both the words of the guidance and the form in which it will appear both online and on paper. For example, there is a distinction between what will be on the face of the online form and what will require a respondent to click through to obtain further information.

Whatever ONS's view of the aim of the sex question, and whatever the wording of the guidance, the Panel expects to be given a clear assessment of any possible bias or distortive effects, both directly on the question itself, and also on other aspects of the methodology of the census, such as approaches to linkage, undercount and imputation, and future uses of the census.

#### **Code of practice: wider issues**

The code of practice refers to stakeholders, users, and topic and methods experts. The authors of the two letters, in the main, fall into all three categories. This may well also be the case for other stakeholders who take a different view. The code of practice places strong requirements for the views of groups in all these categories to be understood and addressed. Because this issue is contentious, it would be prudent for ONS to err on the side of abundance of engagement, collaboration and understanding of needs and views. It would seem appropriate to approach paragraph Q2.2 of the code of practice with a presumption that there is a sincere range of views as to what constitutes "recognised standards" in this area. As well as more informal contact with users and experts, they will presumably be given written feedback addressing issues they have raised, at an appropriate level of detail and rigour.

On less contentious topics, the Panel has been given general assurances about stakeholder engagement and has been happy to take these on trust. Because of the sensitivity and contentiousness of this particular matter, the Panel would find it helpful, as part of its review of the proposed guidance, to be provided a more detailed account of the various consultations and collaborations that have taken place as part of the background research.

I am copying this letter to [REDACTED] and to the Office for Statistics Regulation.

*W -th best wishes*

*Bernard*

BERNARD SILVERMAN