

Hello

Despite being able to find the Guidance itself via many channels, I could not find where to give my feedback, so I am having to email it here, and very much hope it will still be able to be considered even though the closing date is tomorrow (8th February 2021).

It is very important that in certain situations it is at least sex which is required and if **both** sex and gender identity can be supplied so much the better for understanding social phenomena. Muddling gender identity with sex leads to the collection of inaccurate data on both.

For example, to better understand

- if the rise in sexual offences committed by women can be accounted for by the rise in number of trans women (i.e. biological males) committing these offences. If only self-identified gender is recorded by Police / in crime statistics there is no way to explore this without doing separate, and costly research.
- the impacts of fear of crime and crime itself, and separating out transphobia from (the much larger) general violence against women. I maybe mistaken, but I think abusive comments, threats and intimidation are not described as hate crime if against cis women.
- medical situations, for instance blood donation - where females are more likely to have an antibody (especially if they had ever been pregnant) which would cause a harmful reaction in (male) recipients. The Welsh Blood Service put out a notice to this effect, and anecdotally I saw this message on a blog: "I asked about trans identifying donors when I gave blood, and was told by the nurse that donors would be treated as the 'gender' they identified as. I asked if that caused problems - the iron level test is different for men and women, and I had had to stop being a platelet donor because I developed the antibodies when I was pregnant that can be fatal to males. The nurse was very disapproving, dodged it all and said 'we treat people as who they say they are'"
- participation in leisure and cultural activities - how can we evaluate the various programmes that have aimed at getting girls participating in sports if cis and trans girls are not separated out? It may skew figures if boys self-identifying as girls are included.
- Almost any initiative specifically targeting women, whether it be around protection from domestic violence, aiming to increase opportunities for higher education, employment in certain sectors, career progression, will not be able to be evaluated properly if trans women (biological males who may self-identify as women) are not separated from cis women

Service delivery:

- population health programmes, such as screening and immunisation, in many, many cases, biological sex is important, breast cancer, cervical screening, prostate cancer, cardiovascular risk assessments, Chlamydia immunisation,
- individual healthcare, e.g. the "normal ranges" of many biochemical measures are different for male and female.

Thank you for your consideration

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