

The initial boxes are name, organisation, etc.

The first box of substance to fill in:

What is your main area of interest or your broad area of research, in terms of topic and groups that you're interested in?

The LGB Alliance is a group that represents the interests of a rapidly growing number of lesbian, gay and bi-sexual people. We represent thousands of LGB people who have grave concerns about the loss of our rights, specifically in relation to moves to replace, in law and elsewhere, the category of 'sex' with 'gender identity', 'gender expression' or 'sex characteristics'. In the world of LGBT rights this is not just a question of language as it erases homosexuality. We are long-time gay and lesbian activists who fought for the rights of people with a same-sex sexual orientation which we now see eroded.

Current Data or Evidence

This section focuses on current data and evidence, what we measure, how we measure it and in what detail.

Are there any questions you are currently unable to answer because of a lack of data or evidence? If there are any, please tell us what they are.

Currently there are data available to us concerning the inclusion of LGB people across a range of provisions. However, we are becoming increasingly alarmed about the loss of integrity of the data we use due to the current ill-thought-out trend of conflating *sex* and *gender identity*. It is impossible to monitor issues surrounding same sex attracted populations without clear well-defined data. In small populations such as lesbians, allowing heterosexual males who self-identify as women to be categorized as lesbians has the potential to significantly distort the data and obscure any trends that could otherwise help us identify areas of concern where lesbians are being excluded. This makes it impossible to identify areas of need for us to campaign on.

Please tell us the reasons why you are unable to answer these questions. (Please provide further details below)

Please select all that apply

- Gaps in the current data? Problems with measurement? The level of detail available? Something else?

See answer given above.

Data and Evidence Accessibility

This section focuses on how accessible data and evidence are and how clearly they are presented.

Are you currently able to access the data you need for your purposes?

Please select only one item

Yes, all of it Yes, some of it No, none of it

If you are not able to access all the data or evidence you need for your purposes, what data are you unable to access and what are the barriers to you accessing this data?

There is data available for us to use to examine the inclusion of the LGB population in a range of areas (eg health, employment, criminal justice system). However, we are now no longer confident that the data is robust enough to rely on. In the past, data was collected according to sex (and not the undefined term of gender identity) and same sex attracted categories also had their data gathered according to the immutable biological sex. Increasingly we are seeing data collection by public bodies using various undefined terms such as "gender identity" which is neither clearly defined or one of the protected characteristics under the Equality Act 2010.

Data is not something where emotions and self-declaration can be allowed to override actual biological facts and established legal definitions if the data is to be anything more than a collection of well-intentioned anecdotes.

Are there any issues with how the data or evidence that you currently rely on are presented? If so, please provide details.

ONS needs to recognize that changing category definitions introduce risks to the integrity of data. For example, when it comes to presenting statistics around sexual attraction, it is important to state clearly the precise definition of the categories used when the data was collected and processed. ONS needs to be mindful that various Government bodies have adopted (often without consultation) a range of new categories under which they collect data and often they do not reflect existing legally defined terms (e.g. replacing "sex" with "gender", "gender identity", etc.).

The use of re-defined terms means that trends related to the protected characteristics of "sex" and "sexual orientation" cannot be tracked over time.

Making Improvements

This section is about how we can make improvements and learn from what is already working.

Thinking of all the issues you may have experienced with the data and evidence, which of the following improvements would you like to see? Please provide details.

Please select all that apply

- Fill gaps in the current data? Address problems with measurement? Improve the level of detail available?
 Enable greater access to data? Improve presentation of the evidence? Anything else?

As set out in previous answers, our main issue is the lack of clarity around the data and category definitions. Category definitions should always be clear and consistent – from collection to presentation. For example, when it comes to categories describing “sex” or “sexual attraction”, it needs to be clear that the data collected refers to biological sex and not gender.

This is particularly important in the analysis of inclusivity as “sex” and “sexual attraction” are two of the nine protected characteristics under the Equality Act 2010. Analysis surrounding the inclusion of minority and protected groups needs particular attention to prevent conflation of terms that could potentially exclude or misrepresent vulnerable groups. We are particularly concerned about the potential exclusion of lesbians from a range of campaigns if “sex” and “sexual orientation” data is corrupted by basing data collection and presentation on sex self-identification. Any situation where compromised data has been collected must be clearly marked as such and not just allowed to appear to be sex. Without clear definition of sex there is no clear definition/ recognition of same sex attracted sexuality.

Failure to have clear and robust data on “sex” and “sexual orientation” would hinder public bodies from complying with their public sector equality duty obligations under EA 2010 and from carrying out fair and open equality and impact assessments. This is likely to have the unintended consequence of excluding vulnerable groups, like lesbians, if they are no longer counted in ONS statistics.

Please tell us about how important it is for your purposes that data or evidence are comparable across different geographies, for example, across the 4 countries of the UK, internationally or at a more local level? Please give details of what geographies you would like to be able to compare across.

We need to be able to make comparisons across the whole country, so need all 4 nations to be applying the same rigorous data definitions. The Equality Act 2010 applies across all nations of the UK.

We have a range of sister organisations internationally. The ONS should be having open and clear consultations with their international partners to ensure high integrity data is used when making international comparisons.

Please tell us about any impacts you've experienced due to a lack of comparable data or evidence.

[Propose to leave blank]

What change to the current data or evidence would you most like to see to be able to answer the questions that are most relevant to you?

We would most like to see clear definitions of data collected that match the legally defined protected characteristics in the Equality Act 2010. Measures must be put in place to proactively safeguard the integrity of the data collected across these categories. Otherwise there is a very real risk of inadvertently excluding vulnerable groups such as lesbians.

In order to be inclusive of lesbian and gay communities we need to make sure that data regarding their lives is collected using clear definitions and that no creep toward self-identification is allowed to corrupt the data.

Please tell us about any examples of inclusive data and evidence that you think work well. If relevant, please include a link.

[Propose to leave blank]

If there is anything else you would like to add that hasn't already been covered, please share your views here.

[Propose to leave blank]