



Sir Chris Bryant MP
Minister of State for Data Protection &
Telecoms
Department for Science, Innovation &
Technology
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London SW1A 2BQ

www.gov.uk/dsit

To: Dr Caroline Johnson MP
CC: Tonia Antoniazzi MP

27 February 2025

Data (Use and Access) Bill: House of Commons Second Reading

Dear Dr Caroline Johnson,

Thank you for participating in the Second Reading debate of the Data (Use and Access) Bill on the 12th February. During the debate, I promised to write to you regarding the data dictionary amendment.

Data Dictionary

During the debate, we discussed the importance of accurate data in the context of sex. I stressed the importance of ensuring that data is accurate for the purpose that it is being used.

You queried the concept of 'for the purpose'. This is a well-recognised term in data protection when it comes to data use, data storage and data accuracy. What you use it for may affect whether it is accurate or not. For example, personal data that has changed doesn't make the historical record of the data inaccurate – but you must be clear that it is a historical record.

When collecting or otherwise processing data, public authorities will assess what information is required for the particular purpose. A degree of flexibility is often required so that data is defined to meet particular business needs, whilst also complying with relevant legal requirements. This approach guides whether and how sex or gender data is processed in any particular case.

Public authorities are bound by data protection legislation to ensure that personal data they process is accurate for the purpose for which it is being processed and kept up to date where necessary. Consequently, public authorities may assess certain information to be surplus and not required to meet a specified purpose. Often, it is not proportionate to request data about an individual's sex and/or gender, and whether it has changed.

When it comes to digital verification services, the aim of these measures is to secure the reliability of the process by which citizens verify their identity digitally. They are not creating or prescribing new ways to determine a person's sex or gender. Digital verification services can be used to prove sex or gender, in the same way that individuals can already prove their sex using their passport, for example.

The government is committed to driving coordination and adoption of common standards across HMG on core personal attributes. We believe that standardising data will enhance the value of government-held data and deliver numerous benefits throughout the public sector. The Government Digital Service has already begun work on developing data standards on key entities and their attributes to ensure the way data is organised, stored and shared is consistent between public authorities. This has been commenced via a domain expert working group to define a Person entity, which has representation from organisations such as the Home Office, HMRC, Office for National Statistics, NHS England, Department for Education, the Ministry of Justice, the Local Government Association, and Police Digital Service. The Group has been established under the Data Standards Authority to help ensure consistency across organisations.

The Government Statistical Service also published a work plan for updated, harmonised standards and guidance on sex and gender in December 2024 which aligns with the Office for Statistics Regulation guidance on collecting and reporting data about sex and gender identity, which was published in February 2024.

I hope this work we are undertaking provides reassurance of our proactive efforts in this area. And this is why the Secretary of State noted in his opening speech the Government's intention of overturning Lord Lucas' amendments, including the new clause 140 ('data dictionary').

I would welcome the opportunity to discuss the Data Bill further with you and any other colleagues. If you'd like to arrange a meeting, please do let my office know by emailing ps.bryant@dcms.gov.uk. A copy of this letter will be placed in the Libraries of both Houses.

I look forward to hearing from you and the Committee as I take this Bill through the House.

Yours Sincerely,

A handwritten signature in black ink that reads "Chris Bryant". The signature is written in a cursive, flowing style.

Chris Bryant MP
Minister of State