

By email from: [info@forwomen.sco](mailto:info@forwomen.sco)  
to: [CabSecHSC@gov.scot](mailto:CabSecHSC@gov.scot), [Gregor.Smith@gov.scot](mailto:Gregor.Smith@gov.scot)

24 March 2025

Dear Mr Gray and Mr Smith,

NHS Lothian has recently [stated](#) that the Scottish Government is the lead on national policy regarding the practice of changing the sex marker on patient CHI numbers. We are therefore writing to ask you to take immediate steps to bring this dangerous practice to an end on grounds of patient safety.

We have [raised](#) concerns on numerous occasions over the last eighteen months and are disappointed that you have not engaged on the issue. Our correspondence outlined the serious risks, not just with screening programmes, but with interpretation of blood tests with sex-specific ranges, investigations, referrals, correct diagnosis, treatment and prescription dosages. We have been told, incorrectly, that clinicians can access sex data through a retained link with a patient's previous records, whereas a Scottish Government Code of Practice (at [para 374](#)) makes it plain that male/female markers are removed from those historic records.

As well as our previous correspondence and similar warnings in the Cass Review, the recently published Sullivan Review warns of the "potentially fatal consequences for trans people" by failing to record biological sex on medical records and a key recommendation states (at [para 7](#)):

"The NHS should cease the practice of issuing new NHS numbers and changed 'gender' markers to individuals, as this means that data on sex is lost, thereby putting individuals at risk regarding clinical care, screening, and safeguarding, as well as making vital research following up individuals who have been through a gender transition across the life course impossible. In the case of children, this practice poses a particularly serious safeguarding risk, and should be suspended as a matter of urgency."

In response, the UK Government Health Secretary has said that he will act on these findings and has already announced a ban on the health service changing the sex data of under-18s, [stating](#) "I've made it clear this must not happen. We must deliver safe and holistic care for adults and children when it comes to gender, and that also means accurately recording biological sex."

We note that follow-up care and research for children in Scotland who have been prescribed puberty blockers and cross-sex hormones has been significantly hampered, if not made impossible, by allowing children to change their CHI numbers to the extent that the Young People Gender Service at Sandyford is [unable](#) to even determine how many girls and boys are under their care.

The Scottish Government and NHS cannot continue to ignore the issues raised and as Cabinet Secretary for Health and Social Care, and Chief Medical Officer, you have a responsibility to ensure that NHS Scotland is acting to protect patient safety. One would hope the clinical significance of the loss of factual data on patient sex would be of the utmost importance and we call on you to urgently cease the practice allowing sex markers to be changed on CHI numbers for both children and adults across all health boards.

This would bring NHS procedures in line with the Scottish Government Code of Practice which states (at [para 377](#)) that it is important for clinicians to have access to biological sex and recognises the clinical risk created by not having this information.

Yours sincerely,

Trina Budge, Marion Calder and Susan Smith  
Directors, For Women Scotland