

20 October 2014

Case Reference Number ENQ0557694

Dear Jess

Thank you for your email of 9 October 2014.

I am glad our recent article was of interest. We try to ensure we show the relevance of the Data Protection Act to people's day to day lives. I have checked with our communications team and they have no problem with UK Trans Info reproducing Steve Wood's blog post as a pdf on your website if you were to link back to the original blog as offered.

I read with interest your comments regarding the use of gender neutral titles such as Mx. I would tend to agree with you when you say the use of a title as a prefix, (unlike the use of an professional or academic qualification title), it is not controlled by law. My understanding is it relates to an obsolete indication of social status, and as its use has evolved, it can continue to do so.

This is not to say that the use of a title to show respect is obsolete, as to many individuals this is still an important detail. More that the original meaning of Master and Mistress has become overtaken by social changes.

There seems to be no inherent difference between changing a name and changing a title, and where one is altered it would seem correct to ensure the other matches.

The Information Commissioner's Office would say that as good practice, whilst recognising the practicality of making system changes in some organisations, we would encourage data controllers to implement (or have plans to work towards) flexibility in their systems to accommodate gender neutral titles.

And as was previously mentioned in the blog post, if personal information held by any organisation is inaccurate there is a right to request the information is corrected. Whether the data controller should correct the information will be based on the circumstances of the records held. An assessment would need to be made on the circumstances of each case as to whether such an amendment is required to comply with the Data Protection Act.

I hope this information is helpful to you. If you would like to discuss this matter further please contact me on my direct number 01625 545290, or alternatively you can contact our Helpline on 0303 123 1113. In addition, more information about the Information Commissioner's Office and the legislation we oversee is available on our website at www.ico.org.uk.

Yours sincerely

William Davies
Case Officer
Information Commissioner's Office