



Our Ref: ATISN: 11305

21 June 2017

Dear ,

Request for Information – reference ATISN 11305 – National Pupil Database (NPD) data releases to Third Parties

I am responding to your request of 13 March requesting the following information under the Freedom of Information Act (2000):-

1) A list of all requests made between January 1, 2015 and March 31, 2017, for access to data from the Pupil Level Annual Schools Census (PLASC) or Pupil Attainment Dataset, known as the National Pupil Database (NPD). For each request, please provide:

- a. the date of the request;*
- b. the customer organisation;*
- c. the project aims behind the request;*
- d. the level and type of access requested, and*
- e. the outcome of each request.*

2) Statistics on all Home Office and Police requests both received and fulfilled to access pupil level data since March 2012, to include:

- a. date of request;*
- b. volume of individuals' data requested, and*
- c. the volume of data provided from the database.*

3) Any Memorandum of Understanding in place on January 1, 2016 and January 1, 2017 regards data sharing with the Home Office;

4) Confirmation of whether nationality data is collected from pupils in Wales, and if so, the date it was first collected, and the name of the database in which it is stored;

5) As a snapshot of data on March 31, 2017, the total number of unique individuals' data stored in the database for all time, either by the total quantity of unique pupil numbers (UPN) or pupil reference matching numbers;

6) A copy of any document that states the retention period of the records;

- 7) *The table of charges which an applicant must meet in order to receive data;*
- 8) *Details of whether the data release process routinely, or as an exception, suppresses or releases small numbers, and if so, to how many;*
- 9) *The number of audits of organisations receiving data since April 2012, in respect of the data provided to them.*

The Welsh Government holds information in relation to your request, as follows:-

- 1) See spreadsheet entitled 'All Requests' within Annex A
- 2) See spreadsheet entitled 'Home Office Requests' within Annex A
- 3) There is no memorandum of understanding or other data sharing agreement in place between the Welsh Government and the Home Office for access to the NPD in Wales
- 4) Data on national identity has been collected annually since 2003. It is stored in the Annual School Census database. The guidance issued in support of this collection can be found here:

<http://gov.wales/topics/educationandskills/publications/circulars/circular0062009/?lang=en>

- 5) There are 1,034,907 UPNs in the database as at March 31, 2017.
- 6) No document currently exists. Current processing is compliant with principle 5 of Data protection Act 1998. We are currently examining retention periods as part of our work to be compliant with the new European General Data Protection Regulations.
- 7) All applicants must complete a Data Access Agreement (DAA) and a Security Aspects Letter (SAL). See Annexes B and C respectively for copies of these documents.

Whilst we do not charge for any staff time spent in searching for any requested information, under the Freedom of Information Act 2000 and the Environmental Information Regulations 2004 we are entitled to charge for the actual expenses that are incurred in making information available (e.g. the cost of photocopying information and sending this in the post). Such costs would be calculated on a case by case basis, depending on the request. We do not hold a 'table of charges'

- 8) Individual level data is fully anonymised in most cases. Disclosure control is applied to all aggregate data, most commonly by not publishing any actual counts less than 5 or any counts that can be derived to be less than 5 from other data in the dataset to be released.

Disclosure control is an explicit requirement of the DAA and data processors are required to take all necessary steps to protect the confidentiality of data.

- 9) All organisations that want access to individual data (whether identifiable or anonymised) must complete a DAA which is signed off by the Information Asset Owner at Welsh Government. The DAA places certain obligations upon the organisation in respect of what they can and cannot do with the data. Minimum standards must be maintained in relation to information security, as specified in the Security Aspects Letter. All data must be securely destroyed at the end of the project, or in most cases when one calendar year has passed.

If you are dissatisfied with the Welsh Government's handling of your request, you can ask for an internal review within 40 working days of the date of this response. Requests for an internal review should be addressed to the Welsh Government's Freedom of Information Officer at:

Information Rights Unit
Welsh Government
Cathays Park
Cardiff
CF10 3NQ
or Email: FreedomOfInformationOfficer@wales.gsi.gov.uk.

Please remember to quote the ATISN reference number above.

You also have the right to complain to the Information Commissioner. The Information Commissioner can be contacted at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

However, please note that the Commissioner will not normally investigate a complaint until it has been through our own internal review process.

Yours sincerely,