

From: Jen Persson
Sent: 16 December 2016
To: UK Statistics Authority
Subject: Concerns over public datasets at the Department of Education

Dear UK Statistics Authority

Please find attached a status update on the use of pupil data, the school census collected personal data on children used by the Home Office through the Department for Education, and specifically its policy since July 2015.

We respectfully continue to call for an end of the collection of the items in Statutory Instrument 808/2016 ahead of January 19, 2017 the second census collection of these data from state funded school children.

However, where we hope for your help, is consideration for the security of the data integrity, of all personal data held at the Department for Education.

More than Pupil Data is moving to the DfE

Not only in these pupil datasets coming to the Department through school census collections, but the new other new datasets such as Apprentice, Further and Higher Education Applicants and Students data (about to be released from UCAS), which are all about to come under the control or for new purposes of the Secretary of State for Education in the Technical and Further Education and secondly the Higher Education and Research Bills now in the Lords. It is likely that without transparency or oversight, the same issues in school census use, will be copy pasted across more datasets.

Existing data is not being used for only educational purposes

We are concerned primarily for the well being of children and respect for their rights, however, we have come to this through our concern over the lack of transparency and independent oversight of the education data providing official statistics and their compliance with the Code of Practice for Official Statistics, especially around commercial use of identifiable data without respecting consent or confidentiality, and the use of data for short term political purposes rather than objective long term public interest.

These new Home Office access revelations are not the purposes for which parents entrust personal data to schools, or that professional staff submit it to the DfE. This is a Home Office / Cabinet Office policy, rather than reflection on the NPD data team with whom we have had an excellent professional conversations this year with Iain Bell, Iain Knowles and Ian Bradley.

However, If the policy continues it will come at an enormous cost of public and professional trust in all data collection by the Department and undermines its data integrity. That has long term effects.

Worryingly, this is a red flag for the entire nation's administrative datasets, for public interest research, and the integrity of our statistical data if the Home Office can access all areas in secret and without safeguards or oversight especially with the Digital Economy Bill ahead.

Better data security and safeguards will preserve long term data integrity

We suggest that the whole of the NPD is brought under the ONS VML process or similar independent oversight. While a three pronged solution is currently under consideration at

DfE under Iain Bradley, there is a concern that while the lowest level of users may access data through a privacy preserving API, and in future that the most sensitive accredited users through the secure setting, there are two grey areas. The first, the users who cannot be accredited and yet the DfE wishes to continue giving identifiable pupil level data or identifiable data in any form, to which we object and will simply displace the same problems of privacy that exist today. The second is the Back Office use by other Departments, such as Home Office use, without any registry tracking use, transparency or oversight, public or parliamentary scrutiny.

We also ask for your consideration of the other new datasets about to either move to the DfE (data from UCAS under the Higher Education and Research Bill) or for which the purposes are about to be broadened. (Apprentice and FE students data in the Technical and Further Education Bill).

We ask for your support, where any is possible, to take an apolitical protectionist stance of the well being of data and future statistics in the UK, and object to the politicisation of personal data for short term policies that have had neither public nor parliamentary support and consent.

Thank you for any time or consideration you may be able to give.