



Home Office

**Performance and Risk
Directorate**
2 Marsham Street
London SW1P 4DF

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www.gov.uk

Jen Persson
[request-361437-
46bfc953@whatdotheyknow.com](mailto:request-361437-46bfc953@whatdotheyknow.com)

24 July 2017

Dear Ms Persson

Freedom of Information reference number: 41814 – internal review

I write further to my email of 15 March, in which I provided an update on the progress of our internal review, which is now complete.

Firstly, I am extremely sorry for the time taken to respond to your internal review request. The Home Office always aims to reply to all internal review requests within a maximum of 40 working days, but this is not always possible despite our best efforts. I would like to sincerely apologise on behalf of the Department for this delay.

Thank you for your email of 22 December 2016 in which you requested an internal review into the handling of your Freedom of Information (FOI) request. Your request of 10 November 2016, sought information about requests made from the Home Office (HO) to the Department for Education (DfE) to access the National Pupil Database (NPD).

As you are aware, there is some history to this case, so for ease of reference, your two previous requests (and HO response) on this same subject-matter can be viewed at **Annex A-C**.

I have assessed the substance of the response provided to you and can confirm that I was not involved in the initial handling of your request.

The FOI response (**Annex D**), and the supplementary response (**Annex F**), explained that the information you requested was held by the Department but that it was exempt from disclosure with regard to the following exemptions of the Freedom of Information Act 2000 (the Act).

- Section 40 Personal information

Both responses added that the information you requested was sent by the HO to the DfE via a covering request form (a redacted version of which was provided to you), and a

spreadsheet of personal data, in which all of the information would be exempted and redacted (under section 40)

I have taken into account the points made in your internal review request which can be viewed in full at **Annex G**, and have consulted with the appropriate area of the business.

The key part of your request reads as follows:

"I asked for the original request and fulfillment date of requests, the volume of data requested and granted, the types of data (by each field) requested and exchanged, and for what purposes they were stated to be used. I did not ask for the actual personal data exchanged and stated that I understood this would be redacted if contained on the same forms.

None of the information I requested is therefore exempt from disclosure under section 40(2) of the FOI Act, because of the condition at section 40(3)(a)(i) because I expressly said I did not want personal data contained in the forms.

The field names of the data exchanged, and the volume granted are not personal data. Neither are the fulfillment date of requests, the volume of data requested and granted, the types of data (by each field) requested and exchanged, and for what purposes they were stated to be used.

This therefore does not exempt the Department from providing the information requested and that you hold."

Your (refined) request only sought information in relation to those requests made by the HO to the DfE in April 2016; namely the batch of 506; and the 1 urgent (ad-hoc) request.

I have broken-down the component parts of your request for convenience and will consider each in turn:

1. Original request (date)
2. Fulfillment date (of request)
3. Volume of data requested
4. Volume of data granted
5. Types of data (by each field) requested
6. Types of data (by each field) /exchanged
7. Purpose (data to be used for)

1. Original request (date)

The responses provided to you, did not state the dates of the original requests. The business area has now confirmed to me that the date of the request for the batch of 506 was Friday 22 April 2016. The date of the 1 urgent (ad-hoc) request was Tuesday 5 April 2016. I find that this part of your request was mis-handled by the responding unit.

2. Fulfillment date (of request)

The responses provided to you, did not state the fulfillment dates of the requests. The business area has now confirmed to me that the HO was notified (by DfE) of the matches on 27 April 2016 (for the batch of 506 requests), and 8 April 2016 (for the 1 urgent (ad-

hoc) request. Again, I find that this part of your request was mis-handled by the responding unit.

3. Volume of data requested

The responses provided you with this information in the form of the redacted 'Monthly/Ad-hoc request application form'. One form was for the batch of 506; the other form (though not provided), would have been identical, except that the number of individuals to match would have been 1 (an urgent request).

As you are already aware, when the HO makes requests to the DfE, both the 'Monthly/Ad-hoc request application form' and a spreadsheet are both sent per request. These are the only two documents that fall within scope of your request.

Spreadsheet

The *vast majority* of the information contained within the spreadsheet consists of the personal details of individuals, which, if the Home Office were to disclose, would, I am satisfied, breach the first data protection principle, which says (amongst other things), that data shall not be processed unless at least one of the conditions in Schedule 2 to the Data Protection Act is met. Only the first and sixth conditions can be relevant in the context of a Freedom of Information request. These are, in summary, that:

- The data subject has given consent to the processing (condition 1)
- The processing is necessary for the purpose of the legitimate interests of the data controller or a third party (unless the processing is unwarranted because it would prejudice the rights and freedoms or legitimate interests of the data subject) (condition 6)

No condition at Schedule 2 of the Act is seen to legitimise the processing of this data with effect to its unwarranted disclosure into the public domain.

With respect to condition 6(1) of Schedule 2, there is no legitimate interest which might only be necessarily satisfied by the disclosure of the requested information. The individuals on that spreadsheet would have no expectation that their information would be made public. The response was therefore right to cite the absolute exemption at section 40(2) for this type of information.

Monthly/Ad-hoc request application form

For the same reasons, section 40(2) has also been correctly applied to the *vast majority* of the redacted information on the 'Monthly/Ad-hoc request application form'. The exception being the 'Password for encrypted file' field, for which the exemption at section 31(1)(e) - Law enforcement (the operation of the immigration controls) should have been cited. However as this particular matter does not form part of your request for an internal review, I shall make no further consideration of it.

4. Volume of data granted

The responses provided to you, did not confirm the volume of data granted (or matched). The responding unit has now confirmed to me that out of the batch of 506 requests sent from the HO to DfE, there were 84 matches; and there was also a match for the 1 urgent ad-hoc request. I find that this part of your request was mis-handled by the responding unit.

5. Types of data (by each field) requested

6. Types of data (by each field) exchanged

With regard to these aspects of your request, I have found that in respect of the remaining (non-personal) data on the spreadsheet, i.e. the fields, this information is not classed as personal data, and so section 40(2) cannot apply.

Instead of citing section 40(2), the response should have cited the exemption at section 21 (Information accessible to applicant by other means) and directed you to the Memorandum of Understanding (MOU), which provides the information at points 5 and 6 above, regarding the types of information requested/exchanged (shared). The relevant link is as follows: http://defenddigitalme.com/wp-content/uploads/2016/12/20161016_DfE-HO-MoU-redacted-copy.pdf

7. Purpose (data to be used for)

Lastly, with regards to this part of your request, I have found that the response dated 8 December 2016, did in fact, provide you with the purpose behind the requests for the data. It can be found under the copy of the response to FOI 40808. I also note that this same explanation was provided to you in the response to FOI 41221 dated 31 October 2016. The purpose of the requests to the DfE is because the individuals concerned are either:

i) dependent(s) of a parent/guardian who is suspected of an offence under section 24 or 24A of the Immigration Act 1971 or section 35 of the Asylum and Immigration (Treatment of Claimants) Act 2004, or is being committed, or;

ii) the child in question is an unaccompanied minor,

and the Home Office has lost contact with them, giving rise to concerns over their wellbeing.

I hope this has helped clarify this part of your internal review request.

Conclusion

I have concluded that the original FOI response was correct to cite section 40(2) to some – but not all - of the requested information. However the response was at fault for not disclosing some of the requested information, and should also have cited the exemption at section 21(1) to some other parts of your request: this has now been rectified as part of this review, and further clarification has also been provided.

I would also like to apologise for the responding unit's handling of your request and hope that it has not caused you too much inconvenience.

This completes the internal review.

Yours sincerely

R Taylor
Information Rights Team

Annex A

FOI Request – 41221 – Jen Persson – 27 September 2016

“Dear Home Office FOI,

under the terms of the Freedom of Information Act, please can you provide copies of all original requests made to, including those fulfilled by, the Department for Education from the Home Office since January 2012 for pupil data to today's date.

The Home Office has received pupil data at individual level. Not all were fulfilled. Please confirm whether each request was for an individual, or for multiple individuals, and the total quantity of individuals data were requested for and provided, on each of the approved request occasions.

This should include the the original request and fulfillment date, the volume of data requested and granted, the types of data (by each field) requested and exchanged, and for what purposes they were stated to be used.

I understand there may be redactions for specific personal data contained in the documents.

Thank you for your consideration.

*Sincerely,
Jen Persson”*

Annex B

FOI response – 41221 – Jen Persson – 31 October 2016



Home Office

Immigration Enforcement
FOI & PQ Team
Sandford House
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Solihull
B91 3QJ

Jen Persson
request-361437-46bfc953@whatdotheyknow.com

www.gov.uk/home-office

31 October 2016

Dear Ms Persson

Re: Freedom of Information – 41221

Thank you for your e-mail of 27 September, in which you ask for information regarding Home Office requests to the Department for Education (DfE) to access the National Pupil Database (NPD). Your query has been handled as a request under the Freedom of Information Act 2000.

You have asked us to provide:

'Please can you provide copies of all original requests made to, including those fulfilled by, the Department for Education from the Home Office since January 2012 for pupil data to today's date.

The Home Office has received pupil data at individual level. Not all were fulfilled. Please confirm whether each request was for an individual, or for multiple individuals, and the total

quantity of individual's data were requested for and provided, on each of the approved request occasions.

This should include the original request and fulfilment date, the volume of data requested and granted, the types of data (by each field) requested and exchanged, and for what purposes they were stated to be used.

I understand there may be redactions for specific personal data contained in the documents.'

I am able to disclose some of the information that you have requested. A response to your request is in the attached Annex.

If you are dissatisfied with this response you may request an independent internal review of our handling of your request by submitting a complaint within two months to the address below, quoting reference 41221. If you ask for an internal review, it would be helpful if you could say why you are dissatisfied with the response.

Information Access Team
Home Office
3rd Floor, Peel Building
2 Marsham Street
London SW1P 4DF
E-mail: info.access@homeoffice.gsi.gov.uk

As part of any internal review the Department's handling of your information request will be reassessed by staff who were not involved in providing you with this response. If you remain dissatisfied after this internal review, you would have a right of complaint to the Information Commissioner as established by section 50 of the Freedom of Information Act.

Yours sincerely

**Immigration Enforcement
Freedom of Information & Parliamentary Questions Team**

Annex

Home Office requests for information from the National Pupil Database since 2012

- One request in October 2013, for name, address and school details for 341 pupils from the National Pupil Database (NPD) where a match could be found from a list of pupils identified on the Home Office Absconder database.
- Frequent requests are made for groups of individuals in the NPD and provide name, address and school details information. The table below provides information available for 2016.

2016	No. of Requests	No. of Individuals
Jan	1 monthly	23
Feb	1 monthly	60
Mar	1 monthly + 1 urgent	96 (+1)
Apr	1 monthly + 1 urgent	506 (+1)
May	1 monthly	326
Jun	1 monthly + 1 urgent	406 (+1)
Jul	1 monthly	498
Aug	1 monthly + 1 urgent	232 (+1)
Sep	1 monthly + 1 urgent	230 (+12)
	9 monthly (+ 5 urgent)	2377 (+ 16 urgent)

- All cases within these requests are i) dependant(s) of a parent/guardian who is suspected of an offence under section 24 or 24A of the Immigration Act 1971 or section 35 of the Asylum and Immigration (Treatment of Claimants) Act 2004 has been, or is being committed, or ii) the child in question is an unaccompanied minor and the Home Office has lost contact with the child giving rise to concerns over their wellbeing.
- The two requests not granted were due to the NPD not holding the information requested.

To 'include the original request and fulfilment date, the volume of data requested and granted, the types of data (by each field) requested and exchanged, and for what purposes they were stated to be used.'

Under section 12 of the Act, the Home Office is not obliged to comply with an information request where to do so would exceed the cost limit.

We hold some of the information which you have requested, but we have estimated that the cost of meeting your request would exceed the cost limit of £600 specified in the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004. We are therefore unable to comply with it.

Section 17(5) of the Act states that we must provide a brief explanation or example why the cost limit is exceeded. The cost limit would be exceeded as a manual search of each individual record would be needed to ascertain if each request has been fulfilled and the date of that fulfilment.

The £600 limit is based on work being carried out at a rate of £25 per hour, which equates to 24 hours of work per request. The cost of locating, retrieving and extracting information can be included in the costs for these purposes. The costs do not include considering whether any information is exempt from disclosure, overheads such as heating or lighting, or items such as photocopying or postage.

If you refine your request, so that it is more likely to fall under the cost limit, we will consider it again. Section 16 of the Acts states that we must include advice, wherever possible, on how you might refine the request to bring it under the limit, e.g. by narrowing the timeframe. We have included information about what the Home Office does hold in the area you are interested. Please note that if you simply break your request down into a series of similar smaller requests, we might still decline to answer it if the total cost exceeds £600 and even if a revised request were to fall within the cost limit, it is possible that other exemptions in the Act might apply.

The Home Office has obligations under the Data Protection Act 1998 and in law generally to protect personal data. We have concluded that some of the information you have requested is exempt from disclosure under section 40(2) of the FOI Act, because of the condition at section 40(3)(a)(i). This exempts personal data if disclosure would contravene any of the data protection principles in Schedule 1 to the Data Protection Act.

Annex C

FOI Request – 41814 – Jen Persson – 10 November 2016

“Dear Immigration Enforcement FOI PQ,

thank you for your reply. Following your recommendation that the request has been declined in the format asked due to cost and that I could narrow the request, please find attached the original FOI adjusted accordingly.

Please can you provide copies of the original request (one group of 506, plus one urgent) made to the Department for Education from the Home Office in only April 2016, referred to your material already provided.

This should include the original request date, the volume of data requested and granted, the types of data (by each field) requested and exchanged, and for what purposes they were stated to be used.

I understand there may be redactions for specific personal data contained in the documents but hope this is minimal given that I ask for the request, not the returned file.

Please also confirm the file statement that there was one request in October 2013 for 341 individuals, then nothing until January 2016. See also reference by Nick Gibb in PQ 48635, to help understand whether the monthly returns began in July 2015 or only in January 2016. "Between July 2015 and September 2016, the Home Office has made requests of DfE data on 25 occasions." (see ref: <http://www.parliament.uk/business/public...>)

Thank you for your time and consideration.

*Yours sincerely,
Jen Persson”*

Annex D

FOI Response – 41814 – Jen Persson – 8 December 2016



Home Office

Immigration Enforcement
FOI & PQ Team
Sandford House
41 Homer Road
Solihull
B91 3QJ

Jen Persson
request-361437-46bfc953@whatdotheyknow.com

www.gov.uk/home-office

8 December 2016

Dear Ms Persson

Re: Freedom of Information – 41814

Thank you for your e-mail of 10 November, in which you refine your request for information regarding Home Office requests to the Department for Education (DfE) to access the National Pupil Database (NPD). Your query has been handled as a request under the Freedom of Information Act 2000.

You have asked us to:

'Please can you provide copies of the original request (one group of 506, plus one urgent) made to the Department for Education from the Home Office in only April 2016, referred to your material already provided.

This should include the original request date, the volume of data requested and granted, the types of data (by each field) requested and exchanged, and for what purposes they were stated to be used.

Please also confirm the file statement that there was one request in October 2013 for 341 individuals, then nothing until January 2016.

I am able to disclose some of the information that you have requested. A response to your request is in the attached Annex, this includes the original request date, the volume of data requested and the purposes they were stated to be used. A redacted copy of the urgent April request is also attached.

If you are dissatisfied with this response you may request an independent internal review of our handling of your request by submitting a complaint within two months to the address below, quoting reference **41814**. If you ask for an internal review, it would be helpful if you could say why you are dissatisfied with the response.

Information Access Team
Home Office
3rd Floor, Peel Building
2 Marsham Street
London SW1P 4DF
E-mail: info.access@homeoffice.gsi.gov.uk

As part of any internal review the Department's handling of your information request will be reassessed by staff who were not involved in providing you with this response. If you remain dissatisfied after this internal review, you would have a right of complaint to the Information Commissioner as established by section 50 of the Freedom of Information Act.

Yours sincerely

**Immigration Enforcement
Freedom of Information & Parliamentary Questions Team**

Annex

The Home Office has obligations under the Data Protection Act 1998 and in law generally to protect personal data. We have concluded that some of the information you have requested is exempt from disclosure under section 40(2) of the FOI Act, because of the condition at section 40(3)(a)(i). This exempts personal data if disclosure would contravene any of the data protection principles in Schedule 1 to the Data Protection Act. Data exchanged, the volume granted and all personal data is not disclosed.

We will not be able to comply with your request for a copy of the 'one group of 506 in April', as this was made to the DfE via a spreadsheet of personal data and all of the information therein would be redacted.

With regard to your request to:

Please also confirm the file statement that there was one request in October 2013 for 341 individuals, then nothing until January 2016. See also reference by Nick Gibb in PQ 48635, to help understand whether the monthly returns began in July 2015 or only in January 2016. "Between July 2015 and September 2016, the Home Office has made requests of DfE data on 25 occasions." (see ref: <http://www.parliament.uk/business/publications/written-questions-answers-statements/written-question/Commons/2016-10-13/48635/>)

We can confirm that Immigration Enforcement (IE) made one request in October 2013, for name, address and school details for 341 pupils from the National Pupil Database (NPD) where a match could be found from a list of pupils identified on the Home Office Absconder database. Since July 2015 Immigration Enforcement have made frequent requests for groups of individuals in the NPD, these were not recorded the way IE record monthly data requests in 2016.

The Parliamentary Question (PQ) below was answered by the Department of Education, they provided the number of requests they have received from the Home Office, those specifically for the purposes of immigration control and any query regarding this should be made to the DfE.

Department for Education
Pupils: Personal Records
48635

To ask the Secretary of State for Education, pursuant to the Answer of 26 July 2016 to Question 42842 and with reference to freedom of information requests ref: 2016-0032573 and ref: 2016-0042333, on pupil data sharing with the police and Home Office, how many Home Office requests for information to the National Pupil Database for individual personal confidential data that have been granted were for the purposes of immigration control; and if she will make a statement.

A

Answered by: [Nick Gibb](#)

Answered on: 27 October 2016

The National Pupil Database (NPD) is information the Department for Education (DfE) holds on pupils attending schools in England, which includes information collected in the School Census and attainment data from awarding organisations.

The Home Office and police can request data from the NPD where they have clear evidence that a child may be at risk or if there is evidence of criminal activity. The data that can be requested does not include information on nationality, country of birth or English language proficiency.

Between April 2012 and October 2016, the Police have made 31 access requests of the NPD data and the School Census. 21 of these have resulted in information being passed to the police. All were requests for individual level data about individual pupils. Therefore, information about 21 pupils has been shared.

“Between July 2015 and September 2016, the Home Office has made requests of DfE data on 25 occasions. Two of these requests were subsequently withdrawn. During this 15 month period, requests relating to a total of 2,462 individuals have been made by the Home Office to DfE and 520 records have been identified within DfE data and returned to the Home Office.”

FOI 40808 - The response to this FOI was based on the 20 Home Office requests confirmed by the DfE as originating from Immigration Enforcement.

A Freedom of Information request made to the Department for Education on 4 July 2016 found that the Home Office had made 20 requests for information from the National Pupil Database since 2012, 18 of which were granted (https://www.whatdotheyknow.com/request/pupil_data_sharing_with_the_poli#incoming-846569).

I would like to know the reason that each request was made by the Home Office, and the reasons that two of the requests were denied by the Department for Education.

I am able to disclose some of the information that you have requested. The 20 HO requests the DfE received are made up of:

a) One in October 2013, for name, address and school details for the 341 pupils from the NPD where a match could be found from a list of 1892 pupils provided by Home Office from their Absconder database, using a Memorandum of Understanding (MoU) between The Home Office and UK Border Force and the Department for Education.

b) Monthly requests (since July 2015) - to search for groups of individuals in the NPD and provide name, address and school details information. All cases within these requests are i) dependant(s) of a parent/guardian who is suspected of an offence under section 24 or 24A of the Immigration Act 1971, or section 35 of the Asylum and Immigration (Treatment of Claimants) Act 2004 has been, or is being committed, or ii) the child in question is an unaccompanied minor and HO has lost contact with the child giving rise to concerns over their wellbeing.

- c) The two requests that were not granted were because the NPD did not contain the information requested; we could not find the relevant subjects in the NPD, not because the request was 'denied'.

FOI 41221 - (additional to FOI 40808) The response to this FOI is based on information provided by Immigration Enforcement from their recorded requests to the DfE.

- The table below provides Immigration Enforcement information available for 2016.

2016	No. of Requests	No. of Individuals
Jan	1 monthly	23
Feb	1 monthly	60
Mar	1 monthly + 1 urgent	96 (+1)
Apr	1 monthly + 1 urgent	506 (+1)
May	1 monthly	326
Jun	1 monthly + 1 urgent	406 (+1)
Jul	1 monthly	498
Aug	1 monthly + 1 urgent	232 (+1)
Sep	1 monthly + 1 urgent	230 (+12)
	9 monthly (+ 5 urgent)	2377 (+ 16 urgent)

Annex E

Supplementary follow-up to FOI response 41814 – Jen Persson – 13 December 2016

“Dear Immigration Enforcement FOI PQ,

thank you for the reponse. Please may I ask for the complete information requested on November 10:

"copies of the original request (one group of 506, plus one urgent) made to the Department for Education from the Home Office in only April 2016, refered to your material already provided.

"This should include the original request date, the volume of data requested and granted, the types of data (by each field) requested and exchanged, and for what purposes they were stated to be used."

So that should be a copy of the original file - rather than the blank template supplied and include the types of data including each field name requested and each exchanged.

Thank you for your consideration.

*Sincerely,
Jen Persson”*

Annex F

FOI (supplementary) Response - Jen Persson – 41814 – 21 December 2016



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Jen Persson
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www.gov.uk/home-office

21 December 2016

Dear Ms Persson

Re: Freedom of Information – 41814

Thank you for your follow up e-mail of 13 December, in which request for information regarding Home Office requests to the Department for Education (DfE) to access the National Pupil Database (NPD).

You have asked us to:

Please may I ask for the complete information requested on November 10?

"Copies of the original request (one group of 506, plus one urgent) made to the Department for Education from the Home Office in only April 2016, referred to your material already provided.

"This should include the original request date, the volume of data requested and granted, the types of data (by each field) requested and exchanged, and for what purposes they were stated to be used."

So that should be a copy of the original file - rather than the blank template supplied and include the types of data including each field name requested and each exchanged.

The Home Office has obligations under the Data Protection Act 1998 and in law generally to protect personal data. We have concluded that some of the information you have requested is exempt from disclosure under section 40(2) of the FOI Act, because of the condition at section 40(3)(a)(i). This exempts personal data if disclosure would contravene any of the data protection principles in Schedule 1 to the Data Protection Act. Data exchanged, the volume granted and all personal data is not disclosed.

We will not be able to comply with your request for a copy of the 'one group of 506 in April', as this was made to the DfE via covering request form (attached annex)

and a spreadsheet of personal data, in which all of the information would be exempted and redacted.

If you are dissatisfied with this response you may request an independent internal review of our handling of your request by submitting a complaint within two months to the address below, quoting reference **41814**. If you ask for an internal review, it would be helpful if you could say why you are dissatisfied with the response.

Information Access Team
Home Office
3rd Floor, Peel Building
2 Marsham Street
London SW1P 4DF
E-mail: info.access@homeoffice.gsi.gov.uk

As part of any internal review the Department's handling of your information request will be reassessed by staff who were not involved in providing you with this response. If you remain dissatisfied after this internal review, you would have a right of complaint to the Information Commissioner as established by section 50 of the Freedom of Information Act.

Yours sincerely

**Immigration Enforcement
Freedom of Information & Parliamentary Questions Team**



Monthly/Ad-hoc request application form

The aim of applications made by Home Office (HO) is to establish if the Department for Education (DfE) hold information that may/ will support the Home Office/Absconder Tracing Team’s (NATT) key objectives and commitment to upholding a duty of care for missing children and abuse of immigration control through the following five objectives:

- Re-establish contact with families the HO has lost contact with
- To protect the interests and safety of any child
- To reduce harm resulting from abuse of immigration control.
- Combat illegal migrant working and those that benefit from it.
- Create a hostile environment for those who seek to benefit from abuse of immigration control

A Memorandum of Understanding (MoU) that sets out the high level agreement between the HO and DfE has been agreed and put in place.

To be completed by Home Office

The following section should be completed by HO officials and sent to the



Details of individual making request: (Must be an individual with access to Key to Success)	Name	[Redacted]
	Telephone	[Redacted]
	E-mail	[Redacted]
Type of request: (Monthly/Ad-hoc)	Monthly	
Number of individuals to match against DfE records:	506	
Reason for request: (required for ad-hoc requests only)	Not Required	
Password for encrypted file: (spreadsheet should be transferred via Key to Success in advance of this application being submitted)	[Redacted]	
Details of Individual who will pick up DfE matched records: (Must be an individual with access to Key to Success)	Name	[Redacted]
	Telephone	[Redacted]
	E-mail	[Redacted]
Additional information: (any information that might assist DfE when assessing this request)		

To be completed by Department for Education

The following section should be completed by DfE officials and sent to the nominated individual above (individual who will pick up DfE matched records):

Number of individuals provided to match against DfE records:	
Number of individuals for whom a match was found by DfE:	
Date of request:	
Date of completion:	
Turnaround time: (Working days)	
Password for encrypted file: (spreadsheet should be transferred via Key to Success in advance of this application being returned)	
Additional information: (any information that might assist HO)	

Annex G

Internal Review request – Jen Persson – 22 December 2016

“Dear Home Office,

I am writing to request an internal review of Home Office's handling of my FOI request 'Pupil Data: requests made to the Department for Education for Home Office access to NPD data' reference 41814.

The original request was narrowed, at the Department request based on cost and time, to provide copies of all original requests made to, including those fulfilled by, the Department for Education from the Home Office since January 2012 for pupil data to today's date.

I asked for the original request and fulfillment date of requests, the volume of data requested and granted, the types of data (by each field) requested and exchanged, and for what purposes they were stated to be used. I did not ask for the actual personal data exchanged and stated that I understood this would be redacted if contained on the same forms.

None of the information I requested is therefore exempt from disclosure under section 40(2) of the FOI Act, because of the condition at section 40(3)(a)(i) because I expressly said I did not want personal data contained in the forms.

The field names of the data exchanged, and the volume granted are not personal data. Neither are the fulfillment date of requests, the volume of data requested and granted, the types of data (by each field) requested and exchanged, and for what purposes they were stated to be used.

This therefore does not exempt the Department from providing the information requested and that you hold.

This exemption has therefore been incorrectly applied, I appeal the refusal and request that it is met as soon as possible to meet your legal obligations of this Freedom of Information request made on September 27, 2016.

Given that no other exemption has been applied, we conclude there is none that is relevant, absolute or otherwise and as such there is no need to even apply a Public Interest test. The requested information should simply be provided by return.

A full history of my FOI request and all correspondence is available on the Internet at this address: <https://www.whatdotheyknow.com/request/p...>

*Sincerely,
Jen Persson”*

Annex H

Further complaint procedure

This completes the internal review process by the Home Office. If you remain dissatisfied with the response to your FOI request, you have the right of complaint to the Information Commissioner at the following address:

The Information Commissioner
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF