

Proposed amendments to Individual Pupil Information Prescribed Persons Regulations

Consultation Response Form

The closing date for this consultation is: 18 December
2012

Your comments must reach us by that date.



Department
for Education

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Please tick if you want us to keep your response confidential.

Reason for confidentiality:

Name

[REDACTED]

Organisation (if applicable) Greater London Authority

Address:

[REDACTED]

If you have a query relating to the policy content of the consultation you can contact the Department by telephone: 0370 000 2288 or via the Department's 'Contact Us' page.

If you have a query relating to the consultation process you can contact the Public Communications Unit on:

Telephone: 0370 0002288

e-mail: consultation.unit@education.gsi.gov.uk

Please mark an 'X' in the box that best describes you as a respondent.

<input type="checkbox"/> Teacher/Head teacher	<input type="checkbox"/> Parent/Carer	<input type="checkbox"/> Pupil/Student
<input type="checkbox"/> Teacher Union	<input type="checkbox"/> Voluntary Sector/Not-for-profit Organisation	<input type="checkbox"/> Local Authority
<input type="checkbox"/> Commercial Organisation	<input type="checkbox"/> Researcher/HEI	<input checked="" type="checkbox"/> Government Organisation
<input type="checkbox"/> Other		

This response has been compiled by the Intelligence Unit at the Greater London Authority.

1 Do you agree with the proposal to widen the purposes for which data from the National Pupil Database can be shared? Please explain the reasons for your answer.

<input checked="" type="checkbox"/> Agree	<input type="checkbox"/> Disagree	<input type="checkbox"/> Not sure
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Comments:

We fully support the Department's intention to amend the restrictions on access to the NPD in support of the promotion of children's education and well-being in England.

We welcome the Government's commitment to improved transparency of public sector data and are active in promoting the benefits of this initiative through the London Datastore.

We have previously accessed several extracts from the NPD but found the application process to be restrictive in terms of our utility of the data. Through improved access to the NPD we will be better able to

- 1) support policy development at the GLA in a range of areas in which the Mayor has jurisdiction in relation to the lives of London's young people.
- 2) Assist subscribing local authorities in the preparation of schools rolls projections and forecasts.

2 How could you or your organisation potentially use the data?

Comments:

We would use NPD data for a number of different purposes:

Demographic and school rolls forecasting:

The GLA has produced population projections and school roll projections since 1992 and at present 27 London boroughs subscribe to the services. These projections are used to plan education services. For improved outputs, cross border mobility analysis from the NPD would be essential as well as an analysis of children by age on roll by school

Monitoring trends and patterns in pupil attainment and characteristics:

The Mayor of London has recently concluded an Education Inquiry which looked at how the capital can build on its recent success in improving attainment and ensure all London schools offer the opportunity for a first class education. A number of recommendations were made in the Inquiry's final report which have since been adopted by the Mayor. Better access to the NPD would allow us to both further develop strategies to meet the recommendations and monitor progress against these.

Understanding London's population:

Understanding London's population and key issues and trends within it is a key part of the Intelligence Unit's role in supporting the GLA to develop effective policy and programmes. The Mayor has statutory responsibilities in key policy areas such as housing, the environment, crime, employment and skills, infrastructure planning and health. Greater access to the NPD would improve our understanding of the key challenges facing young people in each of these areas.

3 What do you see as the benefits of widening the purposes for which data can be shared?

Comments:

See above.

The GLA Intelligence Unit also has vast experience in creating tools for Local Authorities which allow for easy and effective interrogation of large datasets such as the Census and point level crime and ambulance data. We would envisage applying similar techniques to NPD data to improve understanding and drive informed policy making at the local level. We would of course take all steps necessary to ensure any data used in such tools is non-disclosive and meets with DfE requirements.

There is also significant scope for the use of NPD data in sense checking data from other sources on issues such as the geography of disadvantage and poverty in London and in driving the formulation of effective interventions in this area.

NPD data could be used to make substantial improvements to pupil place projections and hence improve our understanding of Basic Need in London.

4 Do you have any other comments you would like to make about the proposals in this consultation document?

Comments:

We would welcome clear guidance on the application process for NPD data which sets out the key criteria which must be met for a successful application. In the past we have been deterred from applying for the data on the basis of a lack of clear understanding regarding the access requirements.

We would be happy to talk to DfE in more detail to expand on our proposals and ideas for using the data should this prove helpful in developing the amendments to the legislation.

5 Please let us have your views on responding to this consultation (e.g. the number and type of questions, whether it was easy to find, understand, complete etc.).

Comments:

All fine.

Thank you for taking the time to let us have your views. We do not intend to acknowledge individual responses unless you place an 'X' in the box below.

Please acknowledge this reply

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X Yes

No

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Reason for confidentiality:

Name

[REDACTED]

Organisation (if applicable)

London Diocesan Board for Schools (LDBS)

Address:

[REDACTED]

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Please Specify:
We provide support for our Church schools both as a core entitlement and through GROW training and support programmes

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<input checked="" type="checkbox"/> Agree	<input type="checkbox"/> Disagree	<input type="checkbox"/> Not sure
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Comments:
To support our schools to be good and outstanding, the information held would be an effective tool to gain the most recent and pertinent information quickly and efficiently. Many schools are willing to share data but we have to rely on a timely and open approach to this. Access to the data would ensure appropriate interventions and also allow more effective and supportive work with LAs.

2 How could you or your organisation potentially use the data?

Comments:

See above. The role would be supportive, timely and part of the accountability that is increasingly being felt by school leaders as well as the Diocese. We have to be proactive in ensuring best outcomes for our schools. We already have the systems set up and regularly meet with school leaders.

3 What do you see as the benefits of widening the purposes for which data can be shared?

Comments:

Openness. An informed body can be highly proactive. Good and outstanding schools can be more easily identified to support others. Areas of strength can be identified and shared. We can support HTs in understanding their documentation and identifying areas to develop.

4 Do you have any other comments you would like to make about the proposals in this consultation document?

Comments:

The rigor used when reviewing applications to access the information is, as you say, highly important. There must be a degree of protection from unsolicited advances made to schools and clear data protection protocols.

5 Please let us have your views on responding to this consultation (e.g. the number and type of questions, whether it was easy to find, understand, complete etc.).

Comments:

Questionnaire well linked within background documentation to ensure ease of use. It was not too long.

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XYes

 No

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Reason for confidentiality:

Name [REDACTED]

Organisation (if applicable) Newcastle University

Address: [REDACTED]

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Please Specify:

1 Do you agree with the proposal to widen the purposes for which data from the National Pupil Database can be shared? Please explain the reasons for your answer.

Agree

Disagree

Not sure

Comments:

There are a range of factors that impact on pupils' education progress and achievement levels, including their socio-economic background (neighbourhood etc as well as family). My main interest lies in their residential mobility histories, especially the effect of frequent moving of home address and also the effect of moving school.

2 How could you or your organisation potentially use the data?

Comments:

I would be linking their address details to data on the characteristics of their local areas in order to look for relationships with pupils' educational performance, with particular focus on the effect of moving between different types of areas and on the relationship with frequency of moving home.

A subsidiary aim would be to examine the length of children's journey to school from home and how the length and nature of the 'school run' has been changing over time.

3 What do you see as the benefits of widening the purposes for which data can be shared?

Comments:

In relation to the principal focus in (2) above, an evidence base for helping to inform decision-making about policies for neighbourhood improvement.

In relation to the subsidiary aim, intelligence geared at obtaining the type of detailed insights which the Population Census in Scotland already provides on travel to school, with its implications for traffic congestion, air pollution, carbon emissions, etc..

4 Do you have any other comments you would like to make about the proposals in this consultation document?

Comments:

I fully support the idea of extending the range of research uses to which the NPD data is put under the controlled access conditions set out in the consultation paper. Educational achievement is key to future national wellbeing and it is especially important to bring low-achieving types of pupils and schools up towards the levels attained by the best.

With the prospect of there being no more Population Censuses, the NPD has a potentially very valuable role to play in the development of substitutes, as currently being explored by the ONS's Beyond 2011 programme of research. But the data should be shared more widely than just with the ONS team.

5 Please let us have your views on responding to this consultation (e.g. the number and type of questions, whether it was easy to find, understand, complete etc.).

Comments:

Nice and straightforward.

Thank you for taking the time to let us have your views. We do not intend to acknowledge individual responses unless you place an 'X' in the box below.

Please acknowledge this reply X

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XYes

No

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Reason for confidentiality: _____

Name

[Redacted]

Organisation (if applicable)

Liverpool John Moores University

Address:

[Redacted]

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Please Specify:

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X Agree

Comments:

2 How could you or your organisation potentially use the data?

Comments:

I want to use data on body mass index as an index of eating behaviour when considering Primary and early Secondary school childrens' perceptions about the benefits or otherwise of a Mediterranean diet. BMI data and other physiological data can help us tease out perceptions or wishes from actual behaviour.

3 What do you see as the benefits of widening the purposes for which data can be shared?

Comments:

To enhance research into the well being of children and education for well being of children.

4 Do you have any other comments you would like to make about the proposals in this consultation document?

Comments:

5 Please let us have your views on responding to this consultation (e.g. the number and type of questions, whether it was easy to find, understand, complete etc.).

Comments:

Questionnaire seems fine. Formatting for editing leaves a little to be desired

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Please acknowledge this reply | |

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X Yes

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Reason for confidentiality:

Name

[REDACTED]

Organisation (if applicable) The Education Endowment Foundation

Address:

[REDACTED]

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<input type="checkbox"/> Commercial Organisation	<input type="checkbox"/> Researcher/HEI	<input type="checkbox"/> Government Organisation
<input type="checkbox"/> Other		

Please Specify: The Education Endowment Foundation (EEF). The EEF is an independent grant-making charity dedicated to raising the attainment of disadvantaged pupils in English primary and secondary schools by challenging educational disadvantage, sharing evidence and finding out what works.

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<input checked="" type="checkbox"/> Agree	<input type="checkbox"/> Disagree	<input type="checkbox"/> Not sure
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Comments:

The EEF agrees in theory with the proposal to open up access to the NPD. The NPD is a rich dataset that has the power to improve social and economic outcomes for children and families if used correctly. The current requirement that the data can only be used for the purpose of research is restrictive. There are many organisations in the education sector that would benefit from being able to access this data to better understand the populations they serve, as well as the impact of the products and services they provide.

We would particularly support the NPD being opened up to enable organisations, including charities and schools to better understand their impact on children's outcomes. However, a change in the regulations will need to be carefully managed with the correct processes and training are in place to ensure that the NPD data is used correctly. Organisations will need to be able to provide evidence that a member of staff has the ability to analyse the data correctly and that they have systems in place to store the data safely.

2 How could you or your organisation potentially use the data?

Comments:

The EEF funds projects aimed at improving the attainment of disadvantaged children in challenging schools. All of our projects are independently evaluated by a member of our panel of evaluators, largely using randomised controlled trials in large numbers of schools. Ultimately the aim of all the projects we fund is to improve children's performance in national high stakes test.

Evaluators apply to use the NPD both to check that samples are balanced at the baseline and to understand the impact of interventions on children, compared to a control group of similar children in similar schools. In addition our overarching evaluator at Durham University will be tracking all the pupils involved in our evaluations to understand the long term and cumulative impact of projects.

The EEF also uses the NPD to better understand its target group of schools and children. For example, by using regression analyses to identify schools that are better at closing the attainment gap between children on FSM and other children, when other factors such as demographics and prior attainment are controlled for.

3 What do you see as the benefits of widening the purposes for which data can be shared?

Comments:

Opening up the NPD to non-research organisations would enable them to better understand the populations that they serve and better understand the impact of the products and services they provide on children's attendance and attainment at school.

For example, the EEF is currently working with Durham University to develop guidance for schools on doing research. We want to encourage schools to become more evidence-led. An important part of this is taking evidence-based approaches to teaching and learning and then testing and adapting these new approaches in their own context. Schools can use standardised tests of literacy and numeracy to understand their outcomes, but it would also be useful for them to be able to access NPD records both of their children and similar children in similar schools in order to be able to understand the impact of any changes they make.

4 Do you have any other comments you would like to make about the proposals in this consultation document?

Comments:

The current process for applying for the NPD takes six weeks, or longer if your application is returned with requests for further information. Policy-makers are keen for the research community to speed up the time it takes to get results from research and evaluations. Streamlining the process for accessing the NPD and providing better guidance on the application process will reduce the time it takes for researchers to set up evaluations and analyse results.

5 Please let us have your views on responding to this consultation (e.g. the number and type of questions, whether it was easy to find, understand, complete etc.).

Comments:

The consultation was clear and easy to respond to. We were given lots of reminders to ensure that we responded before the deadline.

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Please acknowledge this reply X

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X Yes	<input type="checkbox"/> No
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Reason for confidentiality:

Name	<div style="background-color: black; width: 100%; height: 15px;"></div>
Organisation (if applicable)	Durham LA
Address:	<div style="background-color: black; width: 100%; height: 30px;"></div>

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<input checked="" type="checkbox"/> Agree	<input type="checkbox"/> Disagree	<input type="checkbox"/> Not sure
---	-----------------------------------	-----------------------------------

Comments: It seems a sensible suggestion to make more use of a pre-existing publicly owned asset.

2 How could you or your organisation potentially use the data?

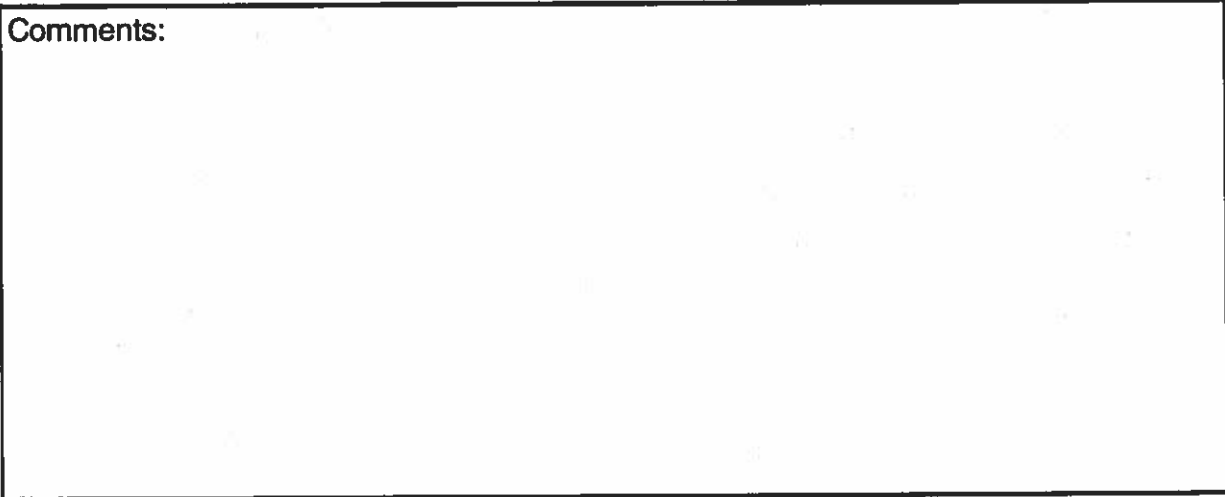
Comments: It may not have any implications for us. However, it may lead to improving our access to non-attainment data for academies in our geographical area. This would increase our ability to monitor attendance and exclusions for children in these establishments.

3 What do you see as the benefits of widening the purposes for which data can be shared?

Comments: As long as there are no risks to children, widening the purposes can only increase collective knowledge and evidence on which to base decisions.

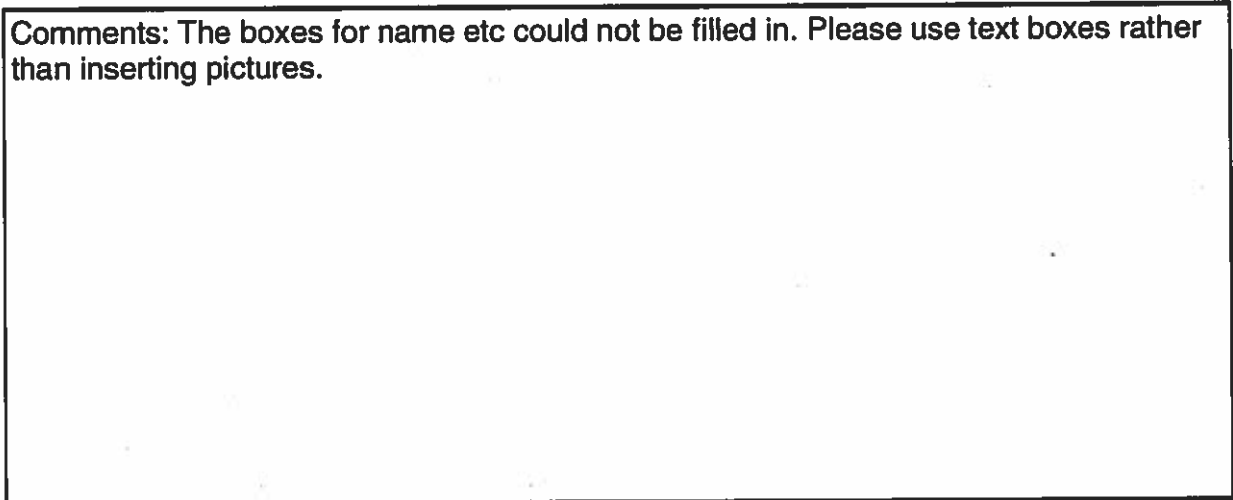
4 Do you have any other comments you would like to make about the proposals in this consultation document?

Comments:



5 Please let us have your views on responding to this consultation (e.g. the number and type of questions, whether it was easy to find, understand, complete etc.).

Comments: The boxes for name etc could not be filled in. Please use text boxes rather than inserting pictures.



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Please acknowledge this reply

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Yes

No

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Thank you for taking time to respond to this consultation.

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Proposed amendments to Individual Pupil Information Prescribed Persons Regulations

Consultation Response Form

The closing date for this consultation is: 18 December
2012

Your comments must reach us by that date.



Department
for Education

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Please tick if you want us to keep your response confidential.

Reason for confidentiality:

Name [REDACTED]

Organisation (if applicable) Diocese of York

Address: [REDACTED]

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e-mail: consultation.unit@education.gsi.gov.uk

Please mark an 'X' in the box that best describes you as a respondent.

<input type="checkbox"/> Teacher/Head teacher	<input type="checkbox"/> Parent/Carer	<input type="checkbox"/> Pupil/Student
<input type="checkbox"/> Teacher Union	<input type="checkbox"/> Voluntary Sector/Not-for-profit Organisation	<input type="checkbox"/> Local Authority
<input type="checkbox"/> Commercial Organisation	<input type="checkbox"/> Researcher/HEI	<input type="checkbox"/> Government Organisation
<input checked="" type="checkbox"/> Other		

Please Specify:

Diocese of York

1 Do you agree with the proposal to widen the purposes for which data from the National Pupil Database can be shared? Please explain the reasons for your answer.

✓ Agree

Comments:

- We feel that dioceses would benefit from having access to the National Pupil Database, as we are accountable for the performance of the schools for which we are responsible.
- If the objective is to improve outcomes for pupils, there is no obvious reason why dioceses, who have rigorous data security and who normally work within a confidential framework, should not have access to this data.
- The National Pupil Database would provide a better platform than is currently available for dioceses for assessing the performance of our schools and ensuring that the highest standards of education are being provided for all pupils.

2 How could you or your organisation potentially use the data?

Comments:

- We feel that it is essential for diocesan school development advisers to have this data to support our work in schools
- The data would be used to support our judgements in relationship to monitoring standards in the schools which we support.
- We feel that it is essential for us to understand the level of achievement of the pupils, in order to provide appropriate advice for our schools.
- As a Church of England organisation our commitment is to every individual child reaching their full potential and the highest possible standards in all areas.
- The area of our work that this would support is connected to the Section 48 inspection framework, which considers 'How well does the school, through its distinctive Christian character, meet the needs of all learners?'
- Diocesan advisers are expected to take into account 'the achievement of individuals and groups and the proportion of learners making expected levels of progress, particularly those that are vulnerable'.
- Diocesan advisers also take account of attendance and exclusion and how the school's strategies relating to this 'reflect its Christian character'.
- We would wish to make available carefully restricted but key elements of the data to our school inspectors, (Statutory Inspections of Anglican and Methodist Schools) to ensure rigorous inspections using robust data.

3 What do you see as the benefits of widening the purposes for which data can be shared?

Comments:

- In the complex area of school improvement it is essential to have common sources of information to remove discrepancies in understanding. As one governor expressed it recently, "At present it is like putting together a jigsaw with one piece missing for diocesan advisers".
- It seems to be quite inappropriate for diocesan support to be disadvantaged in comparison to local authority support, when trying to pinpoint areas for school improvement.
- The use of this rich dataset should enable dioceses to focus on the specific needs of individual schools or groups of schools.

4. Do you have any other comments you would like to make about the proposals in this consultation document?

Comments:

- We feel that this is an important issue for our diocese and we would appreciate the opportunity to have this data available as soon as possible.

5 Please let us have your views on responding to this consultation (e.g. the number and type of questions, whether it was easy to find, understand, complete etc.).

Comments:

The consultation questions are concise and relate well to the proposed amendments contained in the consultation document.

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Yes

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14 December 2012

Future Leaders Charitable Trust submission on the proposed amendments to Individual Pupil Information Prescribed Persons Regulations

Future Leaders Charitable Trust: Our mission is to eradicate educational disadvantage by developing outstanding leaders for challenging schools so that more schools can offer their pupils a better future.

Question 1: Do you agree with the proposal to widen the purposes for which the National Pupil Database can be shared?

Yes, we strongly support data being more widely accessible for the purposes of research and analysis, better targeting services and improved resource allocation.

Question 2: How could you or your organisation potentially use the data?

Increased access to the National Pupil Database would enable us to look in more detail at the impact of our Future Leaders (all of whom are senior leaders) on the children they serve in challenging schools.

Question 3: What do you see as the benefits of widening the purposes for which the data can be shared?

To inform research, to better identify need and improve service design.

Question 4: Do you have any other comments you would like to make about the proposals in this consultation document

No.

Proposed amendments to Individual Pupil Information Prescribed Persons Regulations

Consultation Response Form

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2012

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Department
for Education

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Please tick if you want us to keep your response confidential.

Reason for confidentiality:

Name

██████████

Organisation (if applicable) Marham Junior School

Address:

██████████

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Please mark an 'X' in the box that best describes you as a respondent.

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Please Specify:

1 Do you agree with the proposal to widen the purposes for which data from the National Pupil Database can be shared? Please explain the reasons for your answer.

<input type="checkbox"/> Agree	<input checked="" type="checkbox"/> Disagree	<input type="checkbox"/> Not sure
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Comments:

This is commercially valuable data, it is expensive to collect and analyse. Other users will process these data-sets and are likely to sell back information to schools and other institutions where the data sets originally came from! These data sets should not simply be given away, whilst the checks and balances are vital – commercial criteria should also be applied e.g. agreement could be obtained such that the information produced be made freely available to the supplying institutions or a fee should be paid for the data sets.

2 How could you or your organisation potentially use the data?

Comments: Probably already do

3 What do you see as the benefits of widening the purposes for which data can be shared?

Comments: I am not convinced by any of the arguments that have been put forward that there will be significant benefits under the current proposed release framework.

4 Do you have any other comments you would like to make about the proposals in this consultation document?

Comments:

5 Please let us have your views on responding to this consultation (e.g. the number and type of questions, whether it was easy to find, understand, complete etc.).

Comments:

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xYes No

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Please tick if you want us to keep your response confidential.

Reason for confidentiality:

Name

Organisation (if applicable) Ofsted

Address:

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Please Specify:

Ofsted

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<input type="checkbox"/> Agree	<input type="checkbox"/> Disagree	<input type="checkbox"/> Not sure
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Comments:

Ofsted supports the general direction of government transparency and therefore this seems a sensible step. Clearly it is vital that access to this sensitive data is very carefully managed and robust processes are essential to making this a success. It would be helpful to have assurances that the process will check how the data will assist research and that only the necessary fields will be provided. For example, in some of the examples provided in the consultation document it is difficult to see how much of the attainment data in the NPD would be relevant to the research, and it is our view that only those fields that are relevant and useful should be disclosed. It may be possible to build this into the regulations.

2 How could you or your organisation potentially use the data?

Comments:

Ofsted has a data sharing agreement with the Department for Education which ensures access to the pupil level data required to carry out our inspections, and enables us to make this information and analysis available to schools via the RAISEonline system. Ofsted is focusing on the raising the quality of education nationally and therefore our needs are met under the existing regulations. However, it is possible to envisage carrying out research, or commissioning others to carry out research on our behalf, into matters of national importance which would not be covered under the existing regulations and which would benefit from access to pupil level data. Examples might include work in the social care arena, aimed at safeguarding and protecting young people.

3 What do you see as the benefits of widening the purposes for which data can be shared?

Comments:

The quality of education and care for children in England is a national issue. Ofsted is an evidence-based organisation and over the past year has carried out much innovative analysis which shows us more about where to focus our resources and where to tackle inequality and underachievement. Data held by government should be used to its full potential to achieve the best for children in England, and high quality research which accurately identifies issues and helps us understand them better than before must underpin this aim. By making the data more widely available, the government can tap into the research expertise across the country.

4 Do you have any other comments you would like to make about the proposals in this consultation document?

Comments:

-

5 Please let us have your views on responding to this consultation (e.g. the number and type of questions, whether it was easy to find, understand, complete etc.).

Comments:

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Reason for confidentiality:

Name

[REDACTED]

Organisation (if applicable) Department of Health

Address:

[REDACTED]

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<input checked="" type="checkbox"/> Agree	<input type="checkbox"/> Disagree	<input type="checkbox"/> Not sure
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Comments:

Currently, confining use of the database to research into the educational achievements of pupils is likely to mean that the data is underused. The database is a valuable source of contact information for children and young people and is likely to be more representative than other sources because it is not limited to those who attend mainstream schools.

However, there will need to be safeguards in place to ensure that the database is not overused or that pupils decide to 'opt out' so their details are not included because of a concern that they will be contacted many times. The latter would affect the representativeness of the database.

2 How could you or your organisation potentially use the data?

Comments:

We would be interested in using the database to identify participants for health research, including surveys. This would reduce the burden on schools, which are often used to identify young people for research.

To ensure maximum value it would be important to ensure that the best quality contact information is available from the database, including accurate address information, phone numbers and possibly email addresses. If quality of information is very patchy it reduce its usefulness.

3 What do you see as the benefits of widening the purposes for which data can be shared?

Comments:

As mentioned above, young people are often sampled within schools and sampling via the NPD would reduce the burden on schools. Research is more likely to be representative as it is broader than just those that attend mainstream schools. In addition, samples would not necessarily need to be clustered by school, making results less influenced by any school effects. Overall, widening the purpose of the database should improve the quality and robustness of research findings.

Also, while a case could be made that health impacts on educational attainment, widening the purpose for which the database could be used should smooth the process in securing access to the database.

Finally, using the NPD for health research means that links can be made to educational achievement and other educational variables without the need to collect information for a second time.

4 Do you have any other comments you would like to make about the proposals in this consultation document?

Comments:

It would be important to be transparent about how information included on the database would be used but it would need to be carefully worded to minimise the risk of people choosing to opt out of providing information because of concerns about being approached to take part in a number of studies. If lots of people, or a particular type of person, opt out this would reduce the representativeness of the database and therefore its usefulness.

There would be value in making sure that contact details are collected consistently and for a high proportion of children (eg through in the school census) so that this information is less patchy.

There would also need to be a transparent and timely process for making decisions about use of the database to ensure research drawing on it meets ethical and quality standards.

5 Please let us have your views on responding to this consultation (e.g. the number and type of questions, whether it was easy to find, understand, complete etc.).

Comments:

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