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Department for
Science, Innovation
& Technology

Department for Science, Innovation and Technology
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www.gov.uk/dsit

Mr Owen Boswarva

Our reference:

FOI2024/00211

owen.boswarva@gmail.com

10 September 2024

Our response to your freedom of information request

Dear Mr Boswarva,

Thank you for your information request which we received on 12 August.

Your request

I understand from recent correspondence with the Department for Business & Trade that in April 2024 members of the House of Lords wrote a letter to Viscount Camrose, care of DSIT, requesting a review of HMG's 2016 decision on an Open Address Register.

I have attached a copy of the letter. I understand DBT does not hold information regarding the status of a reply to the House of Lords letter, or whether one was issued.

Please provide the following information, if held. My request is limited to information received or produced by DSIT since 1 January 2024. For purposes of this request, DSIT includes the Geospatial Commission.

- 1. Any reply made to the April 2024 Lords letter, including any attachments, as well as any further correspondence following from the reply.*
- 2. Any review, evaluation, business case, opinion, or position statement related to the case for an Open Address Register and/or the case for making the Postcode Address File (PAF) or other national address data available to the public as open data.*
- 3. Any representations or briefings received from civil society groups, trade organisations, the Royal Mail, the PAF Advisory Board, Ordnance Survey, GeoPlace LLP, and/or the Geospatial Commission, for or against the case for making the PAF or other national address data available as open data.*
- 4. Any email correspondence (including internal correspondence) or records of meetings related to whether the PAF or other national address data should be available as open data.*

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We have responded to your request for recorded information under the Freedom of Information Act 2000 (FOIA).

Our response

We can confirm that the Department for Science, Innovation and Technology (DSIT), holds some information in scope of your request. However, we have decided to withhold some of the requested information for the reasons outlined below.

Any reply made to the April 2024 Lords letter, including any attachments, as well as any further correspondence following from the reply.

We have attached Viscount Camrose's response to letter received from Lord Clement-Jones CBE, on behalf of Baroness Bennet, Baroness Harding, The Rt Hon Lord Maude, and Lord Watson dated the 26 April 2024.

The attached response was sent on 10 May 2024 date, following which there was no further correspondence on this matter with Viscount Camrose.

We have included both the original letter sent to Lord Camrose, and the response for completeness set out in **Annex A**.

Any review, evaluation, business case, opinion, or position statement related to the case for an Open Address Register and/or the case for making the Postcode Address File (PAF) or other national address data available to the public as open data.

There is no further assessment or evaluation been made since the work that was undertaken in 2016, and which was previously released under FOI2024/07021 (set out in **Annex B**), as the barriers identified through that work remain the same.

Any representations or briefings received from civil society groups, trade organisations, the Royal Mail, the PAF Advisory Board, Ordnance Survey, GeoPlace LLP, and/or the Geospatial Commission, for or against the case for making the PAF or other national address data available as open data.

With the exception of Royal Mail, no representations were received from any of the listed bodies within your request or any other organisations in relation to making the PAF or other national address data available as open data.

In the case of Royal Mail, the Department jointly requested with the Department for Business and Trade (DBT) information from Royal Mail in the formulation of the government response to the proposed amendment to ensure the factual accuracy of any Ministerial representations in the House. The email chains that consider this are set out in **Annex C**. These email chains contain a number of redactions within them that fall into the following areas:

- We consider some information to be exempt from release under section 40(2) of the Act. We are withholding information that includes the names, job titles and e-mail addresses of representatives of organisations and government as this is personal data that may identify a third-party individual. Section 40(2) is engaged because of the condition at section 40(3A), which concerns the personal data of third parties. The De-

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partment has obligations under data protection legislation and in law generally to protect personal data. This exempts personal data from release if disclosure would contravene any of the data protection principles in Article 5(1) of the UK General Data Protection Regulation and section 34(1) of the Data Protection Act 2018. Release would breach the first data protection principle since it would be unlawful and unfair to disclose the information. As section 40 is an absolute exemption, the department is not required to carry out a public interest test.

- Further aspects were also redacted under Section 35(1)(a) exempts information from being released if it relates to the formulation or development of government policy, the basis for which is explained below.

No additional information in relation the opening of address data was sought or provided during the period of the request.

Any email correspondence (including internal correspondence) or records of meetings related to whether the PAF or other national address data should be available as open data

The Department does hold information, and specifically internal correspondence which is included within the e-mail chains that are set out in **Annex C**.

Section 35(1)(a) exempts information from being released if it relates to the formulation or development of government policy. Some of the information you have requested relates to the formulation and development of policy regarding the access to address data. Section 35 is a 'qualified' exemption, and the department is obliged to consider the public interest arguments for withholding or releasing the information we hold.

We understand there is a public interest in information about the access to address data. Decisions that Ministers make may have a significant impact on the lives of citizens and there is a public interest in deliberations on this topic being transparent. Disclosure could provide better insight into the policy and the reasoning behind it and help the public to understand decisions which affect them.

However, policy development on the 'Open Address Register and Access to PAF Data' combines information from across all of the other workstreams above and also those requested under the previous FOI as set out in **Annex B**. Given the nature of that work and considerations and their role in informing any future policy choice, release of this information would adversely affect the options available to Ministers in the future. Ministers and officials need space in which to develop their thinking and explore different options in communications and discussions. We are continuing to use the information in question to inform the ongoing development of policy in relation to access to address data. Disclosing this information could hamper policy development and undermine ministerial decision-making. Good government depends on good decision making and this needs to be based on the best advice available and a full consideration of all the options. The removal of this safe space could lead to a "chilling effect" where both the Department and third parties are less willing to engage in exploration or pilots of new policy ideas where there is a risk of adverse public reaction should such proposals not be implemented.

We therefore conclude that the balance of the public interest lies in maintaining the exemption and withholding the information.

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Next steps

You can ask us to review our response. Please let us know in writing if you want us to carry out a review. Please do so within 40 working days. You can contact us by emailing FOI-requests@dsit.gov.uk or by post at:

Information Rights Team
Department for Science, Innovation and Technology
100 Parliament Street
London
SW1A 2BQ

Please remember to quote the reference number above in any future communications.

If we perform a review but you are still dissatisfied, you can complain to the [Information Commissioners Office](#) (ICO).

You should make complaints to the ICO within six weeks of receiving the outcome of an internal review through the ICO website: www.ico.org.uk/foicomplaints.

Your information

Our privacy notice explains what we do with the personal information which you provide to us. Our [personal information charter](#) sets out the standards you can expect from the Department for Science, Innovation and Technology when we collect, hold or use your personal information.

Yours sincerely,

Department for Science, Innovation and Technology

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Annex A – Exchange of letters between Viscount Camrose and Lord Clement Jones



LCJ letter.pdf



Annex A - Letter to
Viscount Camrose (re

Annex B - FOI2024/07021



Annex B -
FOI2024-07021 FOI R



The ODI review of
Ordnance Survey Pilo



The Executive
Summary.pdf



The Interim
Report.pdf



The Final Report.pdf

Annex C – Email exchanges



Annex C - Email
Exchanges.pdf