
RE: RoPSIR request for permission to re-use UPRN data disclosed by City of Edinburgh Council

1 message

FOI <FOI@os.uk>

22 January 2026 at 15:00

To: Owen Boswarva <owen.boswarva@gmail.com>

Cc: "support@geoplace.co.uk" <support@geoplace.co.uk>

Dear Owen

Thank you for your email of 22 December 2025, sent to both Ordnance Survey and GeoPlace. We are aware of the large number of FOI requests for Council Tax data, including addresses and UPRNs, and welcome the chance to engage with you directly on this issue. Please note that this is a joint response from Ordnance Survey and GeoPlace. We have also consulted, and obtained approval from, the Department for Science, Innovation and Technology (**DSIT**), on the content of this response. (Please note that the licensing referred to in this email is to the position in England and Wales. We are of course aware that the same FOI requests have also been made of Scottish local authorities, where the licensing position is similar, although involves the Improvement Service, with whom we have liaised so as to provide equivalent advice in relation to Scotland. We do not go into any detail on the licensing position in Scotland in this email, so as not to add further complexity.)

As you appreciate, the addressing landscape in the UK is not straightforward, with multiple parties owning intellectual property rights in the various data. As you know, there have been initiatives going back many years to create an "open data" address data. You will also recall the address-related litigation in 2019 between Ordnance Survey/GeoPlace and 77M Limited, and the more recent case involving Royal Mail and Codeberry Limited. In view of the long and complex history, and to help each of us better understand the other's position and have a face to face discussion on the general issues related to this subject, we propose a meeting (virtual or in person) between you and representatives of OS and GeoPlace. Please let me know if this is of interest to you, so that we can make the necessary arrangements; if you wish, we could also invite DSIT to attend, who will be able to give further detail as to the policy position.

In this response, we set out, first, some wider background points relating to the requests referred to above, before then responding to your specific question concerning the City of Edinburgh Council.

Background

Our working assumption is that the vast majority of Council tax address datasets will contain the intellectual property rights of Ordnance Survey, GeoPlace and Royal Mail. This will certainly be the case where the Local Authority has an integrated address management system, with the Local Land and Property (**LLPG**) at the centre, since LLPGs were created, and are updated and maintained, using data from Ordnance Survey, GeoPlace (since its creation in 2011) and Royal Mail, under the PSGA, and its predecessor agreements going back to at least the early 2000s. As a result of such third party IPR in the LLPG, Local Authorities are only able to use such LLPGs if they have a licence of Ordnance Survey's addressing datasets under the PSGA Member Licence, which of course they all do. Note Recital D from the Data Cooperation Agreement (the **DCA**), a standard agreement between GeoPlace and each Local Authority, which provides as follows:

- D Recognising local government as the primary source of new address and street information and Ordnance Survey's public task, the Local Government Association and Ordnance Survey established a joint venture (named GeoPlace LLP) on the 1st April 2011, as a vehicle to create definitive national databases of addresses and streets. GeoPlace achieves this by collecting address and street information from local authorities, in the form of Authority Updates, matching and cross referencing the Authority Updates to data which are variously owned by GeoPlace, Ordnance Survey, IDeA and other third parties. The results are stored in the GeoPlace Databases, and are used to create:
- i) Addressing Datasets which shall be licensed by Ordnance Survey to users, including under the PSGA Member Licence (which for the avoidance of doubt enables licensed use of an LLPG); and

Having said that, we do of course acknowledge that there may be a small number of Local Authorities that have address lists which are comprised wholly of Authority Owned Data. Authority Owned Data is defined in the DCA, and essentially means data not derived from/not containing IPR from Ordnance Survey, GeoPlace or Royal Mail (and, potentially, other third party data, but there is no need to reference this other third party data in this discussion). Whether address data is Authority Owned Data is a decision for each Local Authority to make; the Authority would need to be confident that it has created/maintained all the house names, numbers, street names and localities without any reference to address data licensed through the PSGA Member Licence (or a previous agreement) or data supplied to the Local Authority under the DCA.

Local Authorities' responses to the FOI request to date

In the case of Leeds City Council, in discussions between representatives from Ordnance Survey and Leeds, Leeds provided an explanation as to how their Council Tax address data had been created and maintained, i.e. that it had been held separately from its LLPG and OS address datasets, not cleansed against them, and therefore did not include intellectual property of Ordnance Survey, GeoPlace or Royal Mail. We expect that Leeds is likely to be the exception rather than the rule in this respect. We have not had such conversations with other Local Authorities, and unfortunately suspect that a significant number of those who have disclosed addresses following the FOI request may have done so in error. Indeed, following the publication of guidance by GeoPlace in relation to the FOI for Council Tax data (see attached document, for your information), a number of Local Authorities contacted GeoPlace/Ordnance Survey acknowledging their mistaken disclosure, and requesting guidance as to what they should do now. OS and GeoPlace has now drafted further guidance on this point (see the same attached document, for your information).

Separately, Ordnance Survey/GeoPlace will be following up individually with all the Local Authorities who have released their Council Tax addresses, as listed on datadaptive.com, to ensure that they understand the intellectual property and licensing position, and have not released the data in error.

Requested next steps

Where you are notified by a Local Authority that it has disclosed the addresses in error (or where we inform you of this, having communicated directly with the Local Authority ourselves), we request that you remove the addresses from datadaptive.com. Whilst we are happy for you to retain the data subject to the database rights and copyright of Ordnance Survey, GeoPlace and Royal Mail, this means that you may not reproduce, re-use, distribute, or publish it without the express permission of these three organisations. As you will probably be aware, this restriction does not apply to reasonable use for your own non-commercial research purposes, private study, or any other uses permitted under the Copyright, Designs and Patents Act 1988. We would also request that you contact any organisations or individuals who have accessed the data from datadaptive.com to inform them of the position, and post wording to the same effect on datadaptive.com. We would also request that you preserve any records evidencing where the address datasets have been accessed from datadaptive.com, e.g. names of individuals or organisations, where available, and IP addresses; this is in case Ordnance Survey, GeoPlace or Royal Mail need to investigate potential infringements of address data at a later stage.

Rationale for Ordnance Survey/GeoPlace position

We appreciate that you have a sophisticated understanding of the policy context, but summarise it here in any case for the record. Ordnance Survey is a wholly owned Government company, which provides the national mapping service, and has been established by Government to operate as a commercial organisation, generating licensing revenue in order to fund its operations and deliver its public task. Accordingly, Ordnance Survey generates revenue from the sale of its products, including the AddressBase products, and pays a royalty on such sales to GeoPlace.

We are of course aware of public interest from certain quarters in various address data being made available for free and on permissive terms (such as under the Open Government Licence), and that this has been considered by our stakeholders. The key point from our perspective is that the question as to whether publicly owned address data should be made available for free and on permissive terms is a wider policy question for Government. As you know, Ordnance Survey makes available a significant number of datasets under open or permissive terms as part of the policy known as Open MasterMap; further information on the background to this policy can be found here https://assets.publishing.service.gov.uk/media/5b21151eed915d2cd274dcf0/OSMM_narrative.pdf. The delivery of Open MasterMap is one of Ordnance Survey's obligations under the Public Sector Geospatial Agreement (PSGA), which was entered into by Ordnance Survey and the Geospatial Commission (now the Government Digital Service (GDS), within DSIT), as of 1 April 2020. All IP owners and contributors were consulted during the policy development phase of the Open MasterMap policy, which took into account the case for increasing open data, balanced with the rights and interests of IP owners. Whilst certain address-related information, in particular the UPRN and associated x,y, was made available on open terms as part of Open MasterMap, addresses were not.

We trust that the above provides sufficient explanation as to why Ordnance Survey and GeoPlace wish to ensure that the licensing framework is adhered to so as to preserve the value of the various parties' significant investments in premium address data. These investments are made so as to deliver an ongoing authoritative source of high-quality, geo-referenced address data that can be used across the public and private sector.

Edinburgh

In relation to your specific question concerning Edinburgh, we would make the following observations.

First, please note that Ordnance Survey/Improvement Service will be discussing with the City of Edinburgh Council its release of addresses, to ensure that such addresses do not include intellectual property of Ordnance Survey, the Improvement Service and/or Royal Mail. Irrespective of the outcome of such discussions, we are happy for the City of Edinburgh Council to disclose its Council Tax bands with associated UPRNs. Insofar as the UPRNs are concerned, we are happy that these are released on the terms of the OGL, in line with our UPRN policy. Please note that the City of Edinburgh Council has been informed of our position with respect to the UPRNs.

As mentioned above, we would be very happy to discuss any or all of these points with you in person; if this is of interest, please let me know.

Kind regards

[Redacted]

[Redacted]

Legal Services



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From: Owen Boswarva <owen.boswarva@gmail.com>

Sent: 22 December 2025 10:51

To: support@geoplace.co.uk; FOI <FOI@os.uk>

Subject: RoPSIR request for permission to re-use UPRN data disclosed by City of Edinburgh Council

External Email: Take care with attachments & links.

Good morning,

[Redacted]

[Redacted] the

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Thank you for your attention to this RoPSIR request.

Best regards,

Owen Boswarva

Contact details
e-mail: owen.boswarva@gmail.com

telephone: [REDACTED] or [REDACTED]
address: [REDACTED]

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Thank you for your cooperation.

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<http://www.os.uk>



Addressing FOIs - Guidance and Reactive Comms - 22.1.26.pdf

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