Statistical Disclosure Control Policy for DfE data

Office for National Statistics (ONS) Secure Research Service (SRS) and Integrated Data Service (IDS)

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Contents

Summary

This publication provides non-statutory guidance from the Department for Education. It has been produced to outline the Statistical Disclosure Control (SDC) process used by the Secure Research Service (SRS) and the Integrated Data service (IDS) to allow outputs to be removed from the secure environment and how this applied in the context of education and social care research based on data owned, or made available, by the Department for Education (DfE).

This document also provides special conditions attached to particular DfE datasets.

DfE data shares accessed through both DfE legislation and the Digital Economy Act (DEA) 2017 legislation[1] are covered within this document. Data shares are accessed through the ONS:
- Project Accreditation Service for SRS (PASS)
- People and Projects Service (PPS) - The PPS is a part of the IDS infrastructure.

Who this publication is for

This guidance is for:

- Accredited Researchers working on approved projects within the ONS SRS and IDS.

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[1] For further details on the DfE datasets available under DEA legislation please visit:
About | ONS (metadata catalogue)

Background and aims

Government departments are responsible for producing, analysing and distributing statistics about the UK's economy, society & population to support democratic debate & improve decision making. It is usually not possible to openly publish the underlying data because of the risk of disclosing information that breaches confidentiality.

Through the ONS and data owning departments allow access to unpublished data to third parties (individuals and organisations) for statistical research purposes where there is a lawful basis to do so, and the use of the data demonstrates a clear public benefit.

Accredited Researchers working on approved projects may want to remove analysis from the SRS or IDS for many reasons, including:

- to continue working on it outside the environment;
- to share results with supervisors / funders / co-workers;
- to publish within a report or equivalent.

The role of the ONS SRS and IDS Support teams is to ensure that any output removed from a secure environment is a safe output - that is, an output that is non-disclosive and maintains the confidentiality of the data used. This is achieved through the risk management process of SDC and IDS. This document will outline how the ONS Support teams use SDC when checking outputs and, in particular, how the approach is applied to research based on projects using DfE data.

DfE legislation

For DfE data being access under DfE legislation: SDC is applied to minimise the risk of individuals, businesses or other statistical units being identified from any shared or published materials.

DEA legislation

For DfE data being accessed under the DEA rather than DfE legislation: SDC is applied to ensure that individuals, businesses, or other statistical units **cannot** be identified from any shared or published materials, either by removing the risk entirely or using statistical techniques to transform them.

Statistical Disclosure Control in the SRS / IDS

In the SRS and IDS, by default all outputs are checked against a low count threshold of 10. 10 was determined to be sufficiently high to maintain confidentiality of the data across a range of datasets whilst also being operationally easy to check against for the ONS Support teams. Data owners can request to set the threshold for their data higher

or lower than 10 depending on the level of risk they are comfortable with. **The Department for Education will be applying the default position of using 10 as the low count threshold.**

The SRS and IDS operates a principles-based approach to SDC. This means that although outputs are checked against a threshold of 10, outputs that contain counts below the threshold could still potentially be removed from the environment, with data owner permission, if the researcher can justify how that low count remains without disclosure risk. Researchers should only request permission to remove outputs from the SRS or IDS which fall outside the specified threshold by exception when it is deemed vital to their research rather than as a standard request.

Statistical Disclosure Control in the context of DfE data

SDC will be applied based on the data used to construct each output. If a combination of data sources is used, the strictest set of rules applicable to the sources in scope will apply. This will be relevant for outputs including data from JISC (formally HESA) or Children in Need (CiN) / Children Looked After (CLA) which have different SDC rules to other DfE owned data.

For shares under DfE legislation, the rules applicable to a particular share will be documented within the project data schedule whereas for shares under the Digital Economy Act (DEA) the researchers will be responsible for declaring which data sources have been used to derive any statistics or tables.

General rules (for shares not including JISC / HESA or CiN / CLA)

For **counts of individuals** (pupils, learners and teachers), outputs using DfE data shall adopt the standard process of considering numbers below 10 as a low count that cannot be removed from the SRS. Unless expressly stated otherwise in the agreed data schedule for the project, **counts of zero are permitted** (this applies to both structural and actual counts of zero).

For outputs containing totals alongside the constituent values feeding into the totals, where one or more component values requires suppression, the user will be required to adjust the totals to reflect the changes to suppressed cells – the total should be the sum of the constituent values after suppression.

On occasion, education researchers may wish to publish **counts of education institutions or geographical locations** rather than counts of people. In this instance:

    A. Where a researcher has been working with an institution and the **institution has agreed to be fully identified** within the write-up of the research, this will be considered as acceptable during the SDC process. Identification of institutions is

not permitted under the DEA and therefore this will only be permitted for data shares under DfE legislation with the institutional agreement to be identified being evidenced to DfE during the data request process to ensure this is reflected in the agreed data schedule otherwise a case to release the small count will need to be made to data.sharing@education.gov.uk as set out below.

B. Where the counts are describing types of school at a national, regional or local authority level (for example 'we compared 5 academies with 5 maintained schools') then so long as the number of that type of school being defined is **either zero or not below 3**, then this will be considered as acceptable during the SDC process.

    In the event that a user wishes to take outputs based on a count of education institutions or geographical locations smaller than three out of the SRS, then a case should be made to DfE during the data request process to ensure this is reflected in the agreed data schedule otherwise a case to release the small count will need to be made to data.sharing@education.gov.uk as set out below.

C. Whilst identification of institutions is not permitted under the DEA, for data shares under DfE legislation where a user wishes to take a count of individuals aggregated to an institution level, and the institution is directly identified within the output (for example, via name, URN, LAESTAB, postcode), this will be considered as acceptable during the SDC process where **BOTH** of the following conditions apply:

- The count of individuals is based on a count of 10 individuals or more (unless expressly stated otherwise in the agreed data schedule for the project, counts of zero are permitted); and
- The requirement to identify individual institutions was approved by DfE during the data application process and is reflected in the agreed data schedule between the DfE and user.

Where either of the above do not apply, a case to release the small count or identify the individual institutions will need to be made to data.sharing@education.gov.uk as set out below.

D. If neither A, B or C are true, then a case should be made to DfE during the data request process to ensure this is reflected in the agreed data schedule otherwise a case to release the small count will need to be made to data.sharing@education.gov.uk as set out below. This is because:

    i.   The risks of identifying an organisation need to be understood – would the school expect to be identified, would it be concerned if they were identified, would identification undermine their trust in the '5 safes' principles?

ii.   Is the identification of organisations permitted under the legal gateway applicable to the share (whilst identification is permitted under DfE legislation, it is not permitted under DEA)?

iii.   The identification of a particular school could have knock on implications in terms of identification of individuals.

General rules for shares under DEA legislation

For **counts of individuals** (pupils, learners and teachers), outputs using DEA accessed, National Pupil Database (NPD) or Individual Learner Record (ILR) data only shall adopt the standard DfE policy of considering numbers below 10 as a low count that cannot be removed from the SRS.

For outputs containing totals alongside the constituent values feeding into the totals, where one or more component values requires suppression, the user will be required to adjust the totals to reflect the changes to suppressed cells – the total should be the sum of the constituent values after suppression.

For all other statistical outputs where SDC requirements are not explicitly covered by DfE rules, Statistical Support output checkers will apply SDC policy in line with the requirements under standard SRS/ IDS output checking procedure.

Identification of institutions is not permitted under the DEA. Corporate bodies (such as schools, colleges, universities, charities, Academy Trusts, pupil referral units) are treated as individual data subjects. Their identities are protected in SDC, and individual corporate bodies must not be identified in the service, or any outputs cleared through SDC.

Please note: The Individualised Learner Records (ILR) data in the Longitudinal Educational Outcomes (LEO) service is the Longitudinal ILR which is a subset drawn from the main ILR source and has increased consistency over years to support longitudinal education outcomes analysis.

Rules for shares including CiN and/or CLA data

For requests including **DfE Children in Need (CiN)** and **Looked After (CLA) data**, the following additional requirements must be followed in addition to those outlined above. These are as follows:

Children in Need (CiN)

- Any outputs including CiN (or CiN matched with NPD) figures between 1 and 5 inclusive must be suppressed and replaced with a 'c', a note 'c' in this table means the figures have been suppressed to protect confidentiality'.

- National and regional figures should be rounded to the nearest 10.

- Percentages where the numerator is between 1 and 5 inclusive or where the denominator is between 1 and 10 inclusive must be suppressed with a 'c'.

- For CiN data, zero is allowed. For CiN matched with NPD data, zero is not allowed for attainment data and should be suppressed with a 'c'.

- CIN percentages should be rounded to one decimal place. For CIN data matched with NPD – it is rounded to the same number of decimal places as in the national publications for each outcome, (so for example most KS4 data is rounded to 1dp) https://explore-education-statistics.service.gov.uk/methodology/outcomes-for-children-in-need-including-children-looked-after-by-local-authorities-in-england-methodology

- Calculated figures such as percentages or averages that would round to zero (e.g., less than 0.05%) but are not zero should be replaced with the symbol 'k' with a note that 'k' is used when a result that is not zero would appear as zero due to rounding.

- CIN data at individual school level or other establishment/institution level should not be published.

Special conditions applying to CIN data

Even if only one cell requires cell suppression, you must suppress at least one other component cell (the next smallest) to avoid calculation of suppressed values from the totals. For all other statistical outputs where SDC requirements are not explicitly covered by CIN rules, Statistical Support output checkers will apply SDC policy in line with the requirements under standard SRS / IDS output checking procedure.

The Requester shall not reproduce the data or include secondary analysis of CIN and/or CLA data within any publication without the prior written consent of the Data Controller unless such reproduction / publication is included within the Permitted Use. Consent is only valid if given in writing, in advance of reproduction or publication of the data. You must inform us of your intent to publish research, and/or analysis, 10 working days prior to publication being released. Consent will only be given within 10 working days in exceptional circumstances by writing to data.sharing@education.gov.uk.

CIN data caveat: 2008-09 to 2011-12 CIN data needs to be treated with caution due to issues around completeness

Please note the individual level children in need census was first collected in 2008-09 and in the initial year the data was only collected for 6 months (covering 1 October 2008 to 31 March 2009). The following year, 2009-10, was the first full year of data.

A number of local authorities informed DfE of problems providing complete data in the first three years of the census. As such, users of the data should be cautious interpreting findings from these early years.

In 2008-09 DfE did not publish local authority level figures. From 2009-10 to 2014-15 data confidence indicators were published alongside each local authority measure in the statistical release providing DfE's assessment of the reliability of the data.

Users of child level data should reference these indicators when interpreting any analysis.

In the associated statistics publication, we advise that comparable time series data is available from 2012-13 (see methodology page for more information).

Children Looked After (CLA) and Children with a Previously Looked After Arrangement (PLAA)

- Any outputs including CLA (or CLA/PLAA matched with NPD) figures between 1 and 5 inclusive must be suppressed and replaced with a 'c', a note 'c' in this table means the figures have been suppressed to protect confidentiality'.

- National and regional figures should be rounded to the nearest 10.

- Percentages where the numerator is between 1 and 5 inclusive or where the denominator is between 1 and 10 inclusive, must be suppressed and replaced by a 'c'.

- For CLA/PLAA data, zero is allowed. For CLA/PLAA matched with NPD data, zero is not allowed for attainment data and should be suppressed with a 'c'.

- CLA/PLAA percentages should be rounded to 0 decimal places. See CLA methodology document https://explore-education-statistics.service.gov.uk/methodology/children-looked-after-in-england-including-adoptions-methodology#content-section-3-content-5.

- For CLA/PLAA data matched with NPD – it is rounded to the same number of decimal places as in the national publications for each outcome, (so for example most KS4 data is rounded to 1dp) https://explore-education-statistics.service.gov.uk/methodology/outcomes-for-children-in-need-including-children-looked-after-by-local-authorities-in-england-methodology

- Calculated figures such as percentages or averages that would round to zero (e.g., less than 0.5%) but are not zero should be replaced with the symbol 'k' with a note that 'k' is used when a result that is not zero would appear as zero due to rounding.

- CLA data at individual school level or other establishment/institution level should not be published.

- PLAA data at individual school level or other establishment/institution level can be published but figures should be rounded to the nearest 10.

Special conditions applying to CLA/PLAA data

Even if only one cell requires cell suppression, you must suppress at least one other component cell (the next smallest) to avoid calculation of suppressed values from the totals. For all other statistical outputs where SDC requirements are not explicitly covered by CLA/PLAA rules, Statistical Support output checkers will apply SDC policy in line with the requirements under standard SRS output checking procedure.

The Requester shall not reproduce the data or include secondary analysis of CIN and/or CLA/PLAA data within any publication without the prior written consent of the Data Controller unless such reproduction / publication is included within the Permitted Use. Consent is only valid if given in writing, in advance of reproduction or publication of the data. You must inform us of your intent to publish research, and/or analysis, 10 working days prior to publication being released. Consent will only be given within 10 working days in exceptional circumstances by writing to data.sharing@education.gov.uk.

Rules for shares including JISC (formally HESA) data:

For linked data requests involving DfE data linked to data from the **Higher Education Statistics Agency (HESA) / JISC**, the default position of using 10 as the low count threshold will not be used and, instead, will require users to apply the following disclosure control policies before outputs are approved for release:

DfE data linked to data from the Higher Education Statistics Agency (HESA)

- all counts of people / individuals must be rounded to nearest multiple of 5.

- any count lower than 2.5 must be rounded to 0 (so zeros are permitted) percentages based on fewer than 22.5 individuals must be suppressed.

- unless expressly stated otherwise within the data schedule, the ONS Support teams will not query percentages displayed as a decimal although, for HESA / JISC data, it is expected that researchers will display percentages to zero decimal places unless there is a good statistical reason for using more precision.

- where numbers or percentages are being rounded, halves must be rounded upwards (for example, 15.5% to zero decimal places would be 16% rather than 15%)

- averages based on 7 or fewer individuals must be suppressed.

In the event that a user wishes to apply for an exemption to the requirements above for an output from a HESA linked data request, they must first contact data.sharing@education.gov.uk via email as early as possible to request discussion to present their case.

Rules for specific types of outputs

Regression

Regression results can be released on condition that the number of degrees of freedom is larger than 10 and that sequential regressions do not differ in counts of observations of less than 10. Any regression based solely on categorical variables or in which there is only a single observation in a category, should be raised with the researcher as a possible disclosure risk. Meeting the above requirements will also allow the release of inferential statistics typically produced alongside regression outputs such as standard errors, t-statistics and p-values.

For regression outputs / statistics including counts of observations from sources (HESA / JISC) where counts must be rounded, then the relevant SDC should be applied to the count after the regression has been completed. So, taking JISC / HESA data as an example, paragraph 14 above contains the requirement that all counts must be rounded to nearest multiple of 5 which means that prior to removing regression outputs from the SRS, the counts must be rounded to the nearest multiple of 5 as outlined below:

Regression Statistics (actual)	
Multiple R	0.7285509
R Square	0.5307864
Adjusted R Square	0.4268157
Standard Error	7.3267666
Observations	12

Regression Statistics (following SDC)	
Multiple R	0.7285509
R Square	0.5307864
Adjusted R Square	0.4268157
Standard Error	7.3267666
Observations	10

Figure 1: Rounding to multiples of 5

Residual plots

As each residual typically represents a single observation, reporting residual plots is to be actively discouraged. Researchers will be asked if they are able to describe the shape of the residual plot or the conclusions drawn from inspecting it using a combination of written descriptions or appropriate statistical tests. If a residual plot is required, ONS Support teams may ask for researchers to remove labels on the x axis to help minimise the risk of indirect identification.

Propensity Score Matching

Outputs typically produced from propensity score matching will be required to follow guidance in this document for the source used for the outputs. Particular attention should

be paid to data visualisations or statistical tables used during covariate balance diagnosis.

Exclusions from the typical rule of thumb are possible for balance diagnostic plots displaying distributions of propensity score by group, although this remains under the discretion of the ONS Support teams. Researchers are advised to provide enough contextual information such that an informed decision on disclosure risk can be made by the support team.

Measures of Central Tendency and Dispersion

Unless otherwise stated with the data schedule, the mean, median, mode, standard deviation or variance of a distribution should be reported based on 10 observations as a minimum (7 for HESA / JISC).

Minima and maxima should be raised with the researcher as a disclosure risk irrespective of the sample size used to produce them. Disclosure risk can be minimised by requiring that the reported minimum or maximum values are shared by at least 10 individuals.

If percentiles are being produced, then these percentile values should be based on a minimum of 10 observations between each percentile value reported.

Class Disclosure

Particularly within the context of frequency tables and cross-tabulations, full (for example, 100%) and empty (for example, 0%) cells are considered to pose a high risk of indirect disclosure, as information pertaining to whole groups can be released inadvertently. In most cases, researchers will be required to suppress these cells and re-calculate totals to prevent disclosure by differencing. Exceptions will be made in cases where zero or full counts are deemed to be structurally non-disclosive by both statistical output checkers.

Maps

Any data point maps produced should be flagged with the researcher as a significant disclosure risk and, if required, a case to release the map will need to be made to data.sharing@education.gov.uk. The production of choropleth or 'heat' maps is strongly encouraged if maps will be produced.

Graphs

Whilst the vast array of data visualisations used by researchers means it is not appropriate to cover all possibilities within this document, in general, researchers and ONS Support officers must check the underlying data used to produce any graph, as they are subject to the same statistical disclosure control requirements as statistical tables.

The ONS Support officer will also check the format that the graph has been provided in to ensure that there is no embedded data within the file.

Sequence Index Plots

Sequence index plots are not permissible for ONS outputs at individual (record) level; but instead, only where data has been batched such that each row represents a group at or above the agreed SDC threshold, in the most part that will be 10+ individuals.

Statistical Disclosure Control and Data Sharing Agreements

All data shares under DfE legislation will be subject to a data sharing agreement between DfE and the requester. To ensure a consistent understanding of the agreed SDC between DfE, ONS and the requester, the agreed schedule to the data sharing agreement for a particular project will outline the specifics to be applied.

This will include confirmation as to whether the project will be subject to the standard rules outlined in this policy, CiN rules as outlined in this policy, CLA rules as outlined in this policy, HESA rules as outlined in this policy (namely 'ONS standard disclosure control for DfE data (including HESA) in the SRS) or something bespoke (the details of which will be outlined in the schedule).

In addition, the schedule should also include confirmation as to whether educational establishments and / or geographical locations are permitted to be directly identified in any outputs. If this is not expressly permitted in the schedule, then this will not be approved for release by ONS without having an exemption approved by DfE.

Requesting an exception to this policy not previously agreed by DfE

In the event that a user wishes to extract outputs from the SRS or IDS based on counts not expressly permitted within this policy (or agreed previously during the application process and documented within the data schedule), or a total not adjusted to account for suppression of the constituent values, then they must first contact data.sharing@education.gov.uk via email as early as possible to request discussion to present their case. **Please ensure to include the DfE reference number in the subject title of any correspondence.**

Whilst it will be for DfE to approve exceptions to the default ONS disclosure controls, it is important that users ensure that ONS support teams or are copied in on any emails to the DfE to ensure they are sighted on progress with individual exemption requests for SRS: srs.customer.support@ons.gov.uk or for IDS: ids.customer.support@ons.gov.uk. **Please note that these considerations may take longer than the standard working**

days turnaround time and it would therefore be helpful if researchers give DfE as much notice as possible as to when they would wish to present a specific case.

Key questions the user must demonstrate when requesting an exception are:

- How can you reassure the public that this low count total does not identify any individuals – including by combining with other published statistics already in the public domain?

- Why is the removal of that small number(s) essential to the value of the research being undertaken.

For data shares under DEA - On occasion, education researchers may wish to be publishing **counts of corporate bodies (such as schools, colleges, universities, charities, Academy Trusts, pupil referral units) and/or geographical locations** rather than counts of people. In this instance:

- The identification of individual organisations is not permitted in the service/under the Digital Economy Act (part 5, chapter 5, section 64) legal gateway that this service operates under.

- Where the counts are describing types of school at a national, regional or local authority level (e.g., we compared 5 academies with 5 maintained schools) then so long as the number of that type of school being defined is at least 3, then this will be considered as acceptable during the SDC process. Where national or geographical counts are not included in the output for comparison purposes, the counts in the output will be assessed against the numbers of schools included in the most recent DfE Schools, Pupils and their Characteristics publication.

In the event that a user wishes to take outputs based on a count of education institutions or geographical locations smaller than 3 out of the SRS or IDS, or there is an instance where the rules above are not clear or sufficient for a particular case, then ONS must use their judgment & principle-based approach to determine if the output is disclosive and whether the output can be released or whether it requires suppression.

Special Conditions for DfE data shares

For CLA and CiN data, see sections above which details specific rules for sharing these datasets. Additionally, there are special conditions as detailed below need to be applied for specific datasets and academic years depending on the data sharing agreement requirements. These rules need to be applied alongside any additional specific rules as set out within the data sharing agreement which applies to the data share.

Covid impacted years for certain datasets:

The Department previously made public commitments to not hold schools and colleges to account on the basis of exams and assessment data from summer 2020 or 2021 and that the data would not be used by others to hold schools and colleges to account. In accordance with that commitment, a decision was made that DfE would not share any establishment IDs alongside KS4 or KS5 data from 2019/20 or 2020/21.

With the return of primary assessments from 2021/22, alongside inclusion of KS4 and KS5 results in the school and college performance tables, the following special conditions will apply:

Key stage 4 and Key stage 5 2019/20 and/or 2020/21

As the Department have made a commitment to not hold schools and colleges to account on the basis of exams and assessment data from summer 2020 and 2021, the Requester agrees that they will not attempt to use the KS4 and KS5 2019/20 or 2020/21 data for accountability purposes, and furthermore the Requester will not attempt to re-identify, extract or publish any 2019/20 or 2020/21 establishment level KS4 or KS5 data from the data held within the ONS SRS or IDS.

The provision of KS4 and KS5 data including school IDs has been permitted for research purposes. Requesters are able to analyse the 2019/20 and/or 2021/22 data alongside other years' KS4 and KS5 data but are not permitted to extract or publish a time series at an individual school level or other establishment/institution level.

Key stage 2 2021/22 and/or 2022/23

The provision of 2021/22 and/or 2022/23 KS2 data including school IDs alongside has been permitted for research purposes. The Requester agrees that they will not attempt to use the KS2 2021/22 and/or 2022/23 data for accountability purposes, and furthermore the Requester will not attempt to re-identify, extract or publish any establishment level data from the data held within the ONS SRS or IDS.

School Workforce Census (SWC) data

There must be no direct way that an individual teacher in the SWC dataset can be linked to a particular pupil or group of pupils (e.g., in the NPD). Attempting to do so indirectly (e.g., by comparing the subject taught within the curriculum module and against a school's exam results in that subject) is not permitted under the terms of the data sharing agreement. The only exception to this is for headteachers as they are visible figures and are publicly accountable for school-level performance (e.g., through the performance tables); therefore, headteachers in the SWC may be linked to pupil data/outcomes at an overall school-level.

Early Years Foundation Stage Profile (EYFSP) and/or Phonics

Since DfE does not publish any establishment level results for the EYFSP and/or phonics screening check in any DfE publication. Therefore, EYFSP and/or Phonics data, cannot be published or made available at an establishment level in any format.

Alternative Provision (AP) providers

The requester will not publish or make available any establishment level data in any form for individual Alternative Provision (AP) providers, including Pupil Referral Units (PRUs), AP academies, and AP free schools.

DfE / Ministry of Justice (MoJ) Matched dataset

Any amendments to Data Sharing Agreement must be agreed in advance by both DfE and MoJ, other than termination of the agreement, which can be required by either DfE or MoJ in the manner set out in the Agreement. All warranties and indemnities extended by the requester to DfE also apply to MoJ.

Both DfE and MoJ must be granted access by the requester to any written or recorded outputs that will be made available publicly (e.g., books, articles, etc.) incorporating information derived from any data access to the MoJ-DfE linked data, <u>at least two weeks (10 working days) prior to release.</u> However, the Requester is free to publish all results/findings without interference from DfE and MoJ, other than to ensure that this complies with the terms set out in this Schedule and Agreement, as well as DfE and MoJ's responsibilities under law, e.g., Data Protection Act 2018, are not breached.

Anything notified to DfE (data.sharing@education.gov.uk) must also be notified to MoJ (DataLinkingTeam@Justice.gov.uk).

DfE and MoJ reserve the right to publish a short summary of the project, including the name of the Requester.

Publication notice

The following applies generally to all DSAs, with exception to those shares where CIN and/or CLA data has been used in publications, or which use the DfE/MoJ matched dataset, or anything which has drafted specifically within the DSA, in relation to a particular project's circumstances:

> The Requester shall not reproduce the data or include secondary analysis of the data within any publication without the prior consent of the Data Controller unless such reproduction / publication is included within the Permitted Use.

> Consent is only valid if notice is given in writing, in advance of reproduction or

publication of the data. You must inform us of your intent to publish your research and/or analysis 2 working days or where that is not possible, as early as possible prior to publication being released to data.sharing@education.gov.uk

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