

13 March 2025

Dear Owen

### **Internal review of decision regarding FOI-2024-2429**

Our Reference: FOI-2024-2429

I am writing in response to your request for an internal review of your Freedom of Information (FOI) request. Your request and our response are published on our website.<sup>1</sup>

You asked for information that we may hold about the inclusion of postcodes in ONS UPRN Directory (ONSUD) and National Statistics UPRN Lookup (NSUL) products. In particular, you requested:

1. Any agreement between ONS and Ordnance Survey related to the inclusion of or use of postcodes in ONS address products or production of postcode data.
2. Any unpublished guidance or technical documents related to the inclusion or use of postcodes in ONS address products
3. Any other information that explains the currency of the postcode data included in ONS address products.

We responded:

1. There is no formal agreement regarding the inclusion or use of postcodes in ONS UPRN products. This is because:
  - a. ONS publishes UPRNs with no other attributes in line with Ordnance Survey's UPRN Open Identifiers Policy. We linked to this policy<sup>2</sup>, which also referenced the Public Sector Geospatial Agreement (PSGA).<sup>3</sup>
  - b. Postcodes allocated to the UPRN are derived from AddressBase and checked against Ordnance Survey's Code-Point Open product, so only open postcodes are published. This is in line with open data licencing.
2. We do not have any unpublished guidance or technical documentation which relates to the inclusion of the postcodes specifically. Everything we have is published on the Open Geography Portal.<sup>4</sup>

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<https://www.ons.gov.uk/aboutus/transparencyandgovernance/freedomofinformationfoi/inclusionofpostcodesintheonsudandnsulproducts>

<sup>2</sup> <https://www.ordnancesurvey.co.uk/products/open-mastermap-programme/open-id-policy>

<sup>3</sup> <https://www.ordnancesurvey.co.uk/products/open-mastermap-programme/open-id-policy>

<sup>4</sup> <https://geoportal.statistics.gov.uk/>

3. We do not have further information which explains the currency of the postcode data, other than the NSUL and ONSUD user guides already referenced in your request.

We also said that the NSUL and ONSUD are not 'address products' as described in your request.

Request for internal review:

In your request for internal review you asked for clarification on what we would consider to be address products, given our website refers to NSUL and ONSUD as address products in several places, and asked us to list what we would consider to be address products.

You also challenged our statement that we have no formal agreement regarding the inclusion or use of postcodes within the ONS's UPRN products, as your request was not restricted to formal agreements only.

## **Address products**

Firstly, our apologies that our initial response was not more clear on this point. ONS Geography defines an 'address product' as a data product that includes comprehensive address attributes, such as house number, street name, and other relevant details. Ordnance Survey and Royal Mail hold ownership of 'address products' in Great Britain.

Since the creation and subsequent open availability of UPRNs, ONS Geography classifies its ONSUD and NSUL products as UPRN products, as they contain and reference UPRN values as attributes. While acknowledging that UPRNs are unique identifiers for addresses, ONS geography prefer to differentiate the terminology to avoid confusion. UPRN products are therefore defined as those that include UPRNs as attribute but exclude all other address attributes, such as house number and street name, etc.

I have spoken with the business area regarding the terminology on our website. Unfortunately, the 'address product' references on our website are outdated, and the team will take steps to update the page to reflect terminology changes. Our apologies for any confusion on this.

## **Information not held**

I have also looked into your query whether any agreement is held regarding ONS's use of postcodes in UPRN products, as opposed to just formal agreements.

The following licences outline the terms of agreement, which were referenced in our response:

- PSGA Member Licence<sup>5</sup>
- Licence terms of Code-Point Open<sup>6</sup> (which is essentially the Open Government Licence)

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<sup>5</sup> <https://www.ordnancesurvey.co.uk/documents/licensing/psga-member-licence.pdf>

<sup>6</sup> <https://www.ordnancesurvey.co.uk/products/code-point-open#overview>

Whilst these were linked to in our original response, I appreciate our reply could have been more clear by stating we abide by the PSGA Member Licence and provide a direct link to this, rather than only linking to the Ordnance Survey Open Identifiers policy.

Other than these two published licence agreements, we do not hold any further agreements.

I appreciate you have also asked for clarification on your summary of the nature of our agreement with Ordnance Survey to use their information. I hope the information in this review provides clarity, but if you have any further queries regarding this, the ONS Geography Team are happy to advise. Feel free to get in touch with them at [ONS.Geography@ons.gov.uk](mailto:ONS.Geography@ons.gov.uk).

## Conclusions

I have found that our original response was correct and has been upheld, with acknowledgement that our response could have been clearer.

If you are unhappy with the outcome of this review, you have the right to appeal to the Information Commissioner. They can be contacted by writing to:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Yours faithfully,

[REDACTED]  
Legal Services

On behalf of:

[REDACTED]  
Internal Reviewer, UK Statistics Authority