



EURIM Personal Identity Group

Response to the NSAI Prospectus – 29th June 2005

EURIM is an all-party parliament industry group concerned with the politics of the Information Society. It has over a hundred parliamentary members (including Ministers and Front Bench Spokesmen) and over seventy corporate and associate members as well as over a hundred observers from Government Departments and the Public Sector. Over the past two years EURIM has had a very active group looking at the political issues around Personal Identity and Data Sharing, including addresses.

The EURIM personal identity group now contains 180 representatives from around 50 organisations, including those running or supplying most of the identity initiatives of central government. Many have extensive experience of the problems of running and maintaining large-scale address files and the widespread inaccuracy of existing sources of information.

They have an interest in all aspects of personal identity attributes, and therefore the NSAI initiative, on the basis that when considering personal identity and the entitlement / eligibility for services the individual's current and previous addresses play a vital role in this assessment. Clearly, in this respect, the NSAI will have a key influence on how the address is identified and utilised as part of this assessment.

The shortness of the period for input means that it has been possible only to open feedback from the most active members of the Group and there has been no opportunity to discuss with our political members. This is not therefore a formal response from EURIM as a whole, but hopefully this will provide a useful contribution towards your deliberations. The EURIM Personal Identity Group would welcome the opportunity to be further involved in the consultation process and we invite a representative of this initiative to present at one of our regular Personal Identity Group meetings where the initiative can be discussed with many of those who would wish to use it, if successful.

The EURIM Personal Identity Group is currently undertaking a significant piece of work relating to properties and their occupiers. Early indications show that there are significant anomalies in the data held across many well-recognised, property related databases. This leads us to believe that there is a requirement for a solid exercise to confirm these findings and also identify their likely causes, in a form that can be used with departments across Government.

General Points

1. What is the primary objective of the NSAI? Who are the expected users? For what purposes? What will it achieve apart from creating a single database? If it is to produce a defined set of addresses why would there be a requirement to identify an address as a flat for example?
2. Is there a high level business case to support this development?
3. Would, as an example of its use, the National ID Database only hold the NSAI unique reference number to identify the individual's address?
4. There is clearly an extensive range of property based reference numbers already in existence which are associated with a range of databases. Does any existing database already hold the complete set of property / OWPA references?
5. If not, which of the databases holds the most complete set of property references?
6. If there is an existing database that contains almost all the property references would it not be simpler to extend this existing database to incorporate the additional references?
7. Is the creation of a single database for NSAI a pre-requisite? Has consideration been given to creating a single source of the truth made up of several physical data sources?
8. There is an inherent problem in using data designed for one purpose to be a driver for another purpose e.g. the Electoral Register is constrained by issues associated with the parliamentary process.
9. With reference to OWPA's, would a houseboat be associated with a mooring number at a property reference or a PO Box associated with the marina for example?
10. Presumably the creation of a new NSAI database will create yet another unique reference number – is the further proliferation of unique reference numbers a good reason not to create a new database?
11. In order to bring together the various property references, currently held in the range of existing databases, there will be a requirement to develop a sophisticated matching routine that will eliminate the creation of duplicate property references in the NSAI database. This will be a significant piece of work – which organisation will be undertaking this task?
12. There is an objective to achieve 99% coverage – how will this be measured? Which organisation will be able to provide the 100% of property references to measure coverage against?
13. In order to ensure that a complete picture of property references is attained, it will be vital to include the many private sector organisations that deal with address related issues in the commercial world on a daily basis. This private sector input will provide: -
 - provide property details based on actual evidence of person related occupancy;
 - provide property details based on actual evidence of business related occupancy;
 - the ability to differentiate between person related entities;
 - a contribution towards the assessment of multiple occupancy;
 - additional addresses.

Multiple Occupancy

14. Identifying the occurrence of multiple occupancy is currently a major issue for many organisations. A recent exercise for an organisation with national coverage showed that a significant number of properties, regarded as single units, strongly appear to be multiple units, based upon evidence of actual occupancy.
15. How will multiple occupancy be defined? Will it be defined by virtue of their being a lock on the door and a separate mailbox?

16. Will the definition extend to potential multiple occupancy or is it just actual evidence of multiple occupancy?
17. Will the multiple occupancy definition include mixed use e.g. a public house?
18. How will the NSAI handle the 'people' elements associated with multiple occupancy in a property related database?
19. How will the multiple occupancy data be maintained in the face of high inner city churn rates?

Second / Holiday Homes

20. What is the relevance to the NSAI in whether a property is a second home or holiday home? Isn't this more an issue for the various tax authorities rather than an issue for a mapping organisation?
21. Will this categorisation require the associated 'people' data to be appended i.e. the details of the owner?
22. Will this categorisation extend to the 'pied a terre' of an MP or contract worker?
23. If someone lives in the city during the week and in the country at weekends which is the first home? Is it the one where the rest of the family live (if there is a family)?

Address Changes

24. It is assumed that address changes relate to, for example, a change from residential to business use, amalgamating houses into a single property, new properties, demolished properties.
25. How quickly will the local and central government notifications be received and updated by OS?
26. Will these changes link to CIP?
27. How will it be checked that address changes reflect physical reality and are not false?

Access

28. Will virtual access allow on-line real time access with sub second response times?
29. What additional data will be available appended to the property details e.g. holiday home and multiple occupancy flags, alias names, 'people' data?
30. What security and back up measures are envisaged? If NSAI becomes the standard for property references then if it becomes corrupted or unavailable users may not be able to undertake their normal business.

General Approach

31. The members of the EURIM Personal Identity group welcome, in principle, the development of a single national spatial address infrastructure.
32. Reference to private sector sources needs to be added.
33. The true measure of the success of NSAI will be that it is adopted as the common standard because it will be the best source of property references.

34. Will the utilisation of NSAI become a mandatory requirement? And if so, cost is likely to become a major issue.

Stakeholder Interface

35. Private sector representation is a fundamental requirement in all the groups planned.

36. Royal Mail is now one of several players and should not be taken as being fully representative.

37. It is suggested that the Management Group should include an independent expert in software development, to help manage the IT development risks. This expert could be drawn, for example, from the BCS or IEE.

38. It is recommended that the main stakeholders should jointly own the IP.

39. There is strong evidence that the most effective databases are jointly managed.

Specification

40. The approach requires the Stakeholder Partnership Group to be fully inclusive of interests equally.

41. The priorities must be accuracy, completeness and timeliness of data.

42. It is suggested that a completely rigorous specification of the data structures, relationships and algorithms be developed ahead of a contract being placed to develop any IT systems in order to eliminate any omissions, contradictions and ambiguities.

Governance

43. Private sector representation is a fundamental requirement.

Jim Lound

Chair – EURIM Personal Identity Group

29th June 2005