

Wolverhampton City Council

Response to “Making Open Data Real: A Public Consultation”

This is Wolverhampton City Council’s response to the Government’s paper “Making Open Data Real: A Public Consultation” – subsequently referred to as “the consultation paper”.

General points

This Council recognises the principles of transparency and open data, and accepts that there is potential value in greater publication of data. We already publish a range of data, including data on the democratic running of the organisation, details of Councillors’ expenses, and items of expenditure over £500. We also note the recently finalised [Code of Recommended Practice for Local Authorities on Data Transparency](#) (“the Code of Practice”), and will be working towards publishing more of the data items which that Code of Practice identifies as a minimum. In addition, a Local Information System is being developed which will make the evidence base for all major strategy documents available transparently to the public.

However, we also believe it is essential to consider the costs of transparency alongside the benefits. The emerging evidence of benefits offered in the consultation paper is largely anecdotal, and does not provide a compelling business case for investment of scarce public sector resources. Even where there are potential financial benefits, they will not always accrue to the body making the investment. It is clear from some of the suggestions in the consultation paper (e.g. in relation to the procurement of ICT systems) that the development of transparency is intended to be a long-term programme, within which the prioritisation and phasing of initiatives will be critical to its sustainability.

The Code of Practice rightly identifies, as its first principle, that publication should be demand-led. We interpret this as referring to demand from the public, not from the Government. This Council intends to prioritise investment in transparency initiatives towards developments which either respond directly to identified local demand, or offer realisable benefits to the Council in the short to medium term. We would not welcome national imposition of further specific requirements for immediate publication of data which does not meet either of those criteria.

Comments on specific consultation questions

Page 6 question 5: What would be appropriate mechanisms to encourage or ensure publication of data by public service providers?

Where there is no direct benefit to a public service provider from publication of its data, the Government could meet additional costs resulting from publication, to reflect the delivery of a wider public good for which the provider (and, where applicable, the commissioner) was not previously funded.

Page 25 question 4: What might the resource implications of an enhanced right to data be for those bodies within its scope? How do we ensure that any additional burden is proportionate to this aim?

Short-term implementation of a requirement to make most data open would have very major resource implications in terms of the need to replace ICT systems, change business processes and retrain staff. An enhanced right to data should be recognised as a long-term aspiration, and public service providers should develop their own long-term programmes for working towards that, taking account of their own cycles of system replacement and business change as well as the public demand for data.

Page 34 question 2: What factors should inform prioritisation of datasets for publication, at national, local or sector level?

For local authorities, priorities should generally be set at a local level reflecting the demand for data, the costs of publication, and potential financial benefits such as reduced administrative burdens in dealing with FoIA and similar queries. There will be scope for voluntary coordination and standardisation between local authorities, particularly in relation to specific services, but priorities should not be mandated nationally unless the Government identifies an over-riding national benefit, and in that case the Government should meet the resulting additional costs.