



Open Data Consultation
Transparency Team
Efficiency and Reform Group
Cabinet Office
1 Horse Guards Parade
London
SW1A 2HQ

26 October 2011

To whom it may concern

**BIG LOTTERY FUND (BIG) RESPONSE TO CONSULTATION
PAPER: 'MAKING OPEN DATA REAL'**

1. BIG welcomes this timely consultation on the future of open data, as an important component of the Government's open public services agenda. As a non-departmental public body, and the largest distributor of good causes cash from the National Lottery, BIG's response takes in scope our own experience and reflects on our experience of working closely with civil society organisations.
2. BIG agrees that open data presents a range of significant opportunities. Noting those six identified in the consultation document, we would particularly highlight 'quality and outcomes'.
3. The consultation states that open data can improve quality and outcomes through enabling benchmarking and 'peer-based competition, sharpened by public scrutiny'. There are certainly circumstances where this works, but there are also other circumstances where open data creates an organic, bottom-up opportunity for improvement in quality and outcomes. Open data can help service providers improve their own effectiveness, even in the absence of direct competition or benchmarking. At a recent NCVO conference for example, a "Civil Society 2.0" workshop showcased the approach taken by Essex Coalition of Disabled People (ECDP). By opening up their data, service providers like ECDP can interrogate their own evidence base; increase their user and staff engagement; consider service improvements; open dialogue with other organisations; and enable commissioners and funders to take informed decisions about their services. And by making other datasets more accessible to those same service providers, they might also be able to target their beneficiaries more effectively (e.g. using location data) or

Big Lottery Fund
1 Plough Place
London EC4A 1DE
T 020 7211 1800
F 020 7211 1750
A 0845 039 0204
www.biglotteryfund.org.uk

UK Chair
Peter Ainsworth

England Chair
Nat Sloane

UK Chief Executive
Peter Wanless CB

We are committed to bringing real
improvements to communities and
to the lives of people most in need



INVESTOR IN PEOPLE



plan better on the basis of trends and forecasts. Open data could therefore help promote quality and outcomes in different ways, not just through stimulating competition between providers. This is particularly important for civil society organisations delivering publicly-funded services at a local level, whose practice may not be as directly comparable with others, and for whom greater competition may not be seen as a benefit.

4. There are also challenges associated with the open data agenda. BIG has discussed these in a recent roundtable meeting with data companies and sector experts. We would be glad to provide more detail on the outcomes of this meeting if desired. Some of the challenges identified which are relevant to this consultation include:

- Limited capacity of some civil society organisations to manage and analyse data. Collecting data for accountability purposes is common, but many lack the skills/capacity to do deeper analysis, and few would have experience linking data or creating new applications using open data.
- Low awareness of civil society organisations of 'open data', the benefits, and how to put this into practice. Need for more success stories and examples.
- Costs for service providers of implementing open data approaches – e.g. training staff and improving ICT and data systems - difficult in context of tighter fiscal constraint and where there are no obvious savings 'downstream'.
- Much harder for smaller civil society organisations to implement open data, particularly those with limited resources or who rely heavily on volunteers.
- Data protection regulation and norms widely perceived as a barrier to data sharing.
- Risks around transparency. For 'early adopters', there are risks related to greater scrutiny from funders, competitors and the public, including potential loss of competitive advantage. However, there may be a 'tipping point' if an expectation is set around open data, where greater transparency becomes the norm and risk is reduced.
- Related to this, there needs to be an acceptance that data may highlight areas of practice where organisations are less successful. Funders need to send strong message that they support learning from what doesn't work and reflective practice, and won't jump to use open data for accountability purposes in a negative way.

5. In light of our assessment of the opportunities and challenges, BIG considers that more time and support for civil society



organisations is needed if they are to adapt to an 'open data' environment. This is partly about systems, but more to do with how people use and relate to data. To help with this, BIG is currently considering how we could support civil society organisations to make better use of their own and others' data, and how we might help showcase best practice. Our messages will likely focus on the value of data to underpin organisational learning and impact.

6. We would be glad to discuss with Government what further support might be needed if the consultation's proposed new open data requirements will take in scope civil society organisations delivering public services. If the intention is for civil society organisations to fall in scope of new requirements – whether regulatory or as a result of changes in commissioning or contracting – we agree that this would need to be phased in slowly, proportionately, and only relate to future activity. In particular, the potential burden on small organisations would need to be very carefully considered.
 7. For BIG's own part, we are conscious that organisations like ours hold vast amounts of data which could be of wider use but is not currently 'open'. This is mainly the result of legacy IT and data management systems; thus making it cost-prohibitive to act retrospectively. However, we are actively exploring how we could take a more open approach in the future and what value this could add to our funding. The rollout of BIG's new Funding Management System presents a good opportunity for any new approach to be implemented from 2013 onwards. This would complement external initiatives that BIG already supports – like the new Knowledge Portal at the British Library – to enhance learning and knowledge transfer in the sector.
-