

An enhanced right to data	Questions
----------------------------------	------------------

1. How would we establish a stronger presumption in favour of publication than that which currently exists?
Through initiatives such as Reducing the Burden and Big Society, the Government has sent out a strong message that it intends to lessen bureaucracy and give more control to local areas. A part of this is handing responsibility to local councils and elected councillors but also to allow them more freedom. This freedom should include allowing them to decide what information serves in the best interests of their local communities. This should be complimented by a very light touch Code of Practice – which offers best practice and guidance, promotes consistency and data quality, but nothing more.
2. Is providing an independent body, such as the Information Commissioner, with enhanced powers and scope the most effective option for safeguarding a right to access and a right to data?
No, because this will create an extra layer of regulation. There is a role for govt to promote consistency and compliance, but the emphasis is also on statutory internal audit teams within councils to undertake ad-hoc compliance checks in line with corporate governance – helping the council identify where improvements could be made.
3. Are existing safeguards to protect personal data and privacy measures adequate to regulate the Open Data agenda?
100% yes. There are already more than adequate protections/processes in place to safeguard open data.
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?
The resource implications would potentially be significant – which in a time of increased austerity and protection of front line services appears to negatively pull against what is really important to councils in delivering their core priorities.
5. How will we ensure that Open Data standards are embedded in new ICT contracts?
No comment.

Setting transparency standards	Questions
---------------------------------------	------------------

1. What is the best way to achieve compliance on high and common standards to allow usability and interoperability?
No comment.
2. Is there a role for government to establish consistent standards for collecting user experience across public services?
If extra resources were made available to local areas to collect user experience data then yes this would be a good idea because it would ensure consistency of information across all areas helping government to identify key trends and local areas to benchmark against each other to drive improvement.
3. Should we consider a scheme for accreditation of information intermediaries, and if so how might that best work?
No comments.

Corporate and personal responsibility	Questions
---------------------------------------	-----------

1. How would we ensure that public service providers in their day to day decision-making honour a commitment to open data, while respecting privacy and security considerations?
The self regulation agenda for local councils promotes the concept of peer review challenge both from an independent perspective and local councillors and residents. We would argue that through these mechanisms and others – including statutory / regulatory frameworks – councils are challenged about the quality and scope of data they publish. Again, it is down to local communities to best decide what open data they want to see and whether this is meaningful to them.
2. What could personal responsibility at Board-level do to ensure the right to data is being met include? Should the same person be responsible for ensuring that personal data is properly protected and that privacy issues are met?
At board level, leaders should be kept updated in respect to i) current government thinking in this area ii) how this impacts on council resources and to what degree iii) how this impacts on shaping future priorities iv) compliance issues to be addressed on an exceptions basis.
3. Would we need to have a sanctions framework to enforce a right to data?
Possibly, but only in exceptional circumstances where compliance was less than 25%. A more constructive approach would be to offer a peer challenge to organisations who were consistently in non-compliance to guide and advise them in developing their open data approach in a way that is helpful and cost effective.
4. What sectors would benefit from having a dedicated Sector Transparency Board?
One board should represent all public sector organisations centrally – in order to minimise duplication and the impact on resources. The primary role of the board should be to facilitate the sharing of guidance and best practice and to promote consistency of key messages, policy development, and data quality.

Meaningful Open Data	Questions
----------------------	-----------

1. How should public services make use of data inventories? What is the optimal way to develop and operate this?
Creating a data inventory would be relatively easy because the information will be published and therefore known to staff responsible for managing web pages. This would constitute a starting point from which a more robust inventory could be refined that would help organisations keep track of what they are publishing – set against what they are expected to publish, timescales, dependencies, and those responsible in the organisation to make it happen. www.data.gov.uk can be used to upload and maintain an inventory that can then be benchmarked against other organisations to identify gaps in provision or areas of improvement.
2. How should data be prioritised for inclusion in an inventory? How is value to be established?
An inventory should be prioritised against:- Priority 1) that which is expected of organisations to publish nationally (mandatory) Priority 2) that which an organisation is publishing as a result of local need or recommendation (guided by its customers) Priority 3) that which an organisation has decided is 'nice to have' – but that which adds value - information deemed useful, but not supported by customer feedback.
The number of webpage hits / customer complaints / compliments / comments should then be monitored to ascertain public opinion and levels of interest in the information.
3. In what areas would you expect government to collect and publish data routinely?
Levels of spending and any outcomes achieved as a result of that spending.

4. What data is collected 'unnecessarily'? How should these datasets be identified? Should collection be stopped?

There are many examples in the new Single Data List of duplication of specific statistics collected within different data sets/returns and reported to different govt departments – particularly finance statistics and Adult Social Care.

The County Council Network CCN (part of the LGA) are already undertaking some work in this area to highlight of these issues – this is being facilitated through the CECSNET group who plan to flag these up to the relevant govt department.

5. Should the data that government releases always be of high quality? How do we define quality? To what extent should public service providers 'polish' the data they publish if at all?

100% data should be of the highest quality – particularly in the public domain where managing the negative risk to reputation is important. Also, data comparisons can be made to inform strategic decisions which must be based on robust data.

Data should only be manipulated by an organisation because there are known errors (eg unavoidable human error) and where, undergoing further refinement/validation, the data becomes more robust and reliable.

Government sets the example	Questions
1. How should government approach the release of existing data for policy and research purposes: should this be held in a central portal or held on departmental portals? All policy releases should be published in one central place.	
2. What factors should inform prioritisation of datasets for publication, at national, local or sector level? No comments.	
3. What is more important: for government to prioritise publishing a broader set of data, or existing data at a more detailed level? This depends on what is important to a particular community and what benefits the dataset would add to that area by drilling down to produce more detail. For example, a community with high economic deprivation may benefit strategically from having access to a greater level of detail so as to identify areas of need and where resources should be targetted.	

Innovation with Open Data	Questions
1. Is there a role for government to stimulate innovation in the use of Open Data? If so, what is the best way to achieve this? Yes, by publishing all guidance, policy developments, examples of best practice, and available resources – for example, toolkits – in a central place / website.	