

Making Open Data Real – consultation response

The consultation questions are unclear, convoluted and somehow simultaneously too specific and too vague. So, this response below brings together the key issues from the DataBridge project, my own policy and practice experience within the voluntary sector, and wider conversations within Brighton about becoming an Open Data City.

Please see also, Chapter 4 of the DataBridge report, attached here, or available at www.databridge.org.uk

Overall I am supportive of the principle of open data and believe that there is much to be gained by publishing more and different types of data from central and local government. I also believe there are big opportunities to bring together engagement & participation work with data, including open data.

Key points for consultation response:

1. Government should be aiming to stimulate social innovation and public service improvement through the release of open data – and this will require a different approach to opening data for commercial purposes
2. Open data does not automatically equate to transparency or accountability. Open data does not automatically result in improved services. It is a means to an end.
3. Open data in its raw form is not accessible for the majority of people – therefore careful thought about what is published, in what format, to what end and to what audience.
4. Open Data is not cost free
5. Much of the work around opening data will take place at a local level – this is almost entirely absent from the consultation. Leadership on the local element is key
6. Open data and the potential benefits (and risks) are not well understood
7. We need to make better use of the data we have – and in some cases, support

people to do so. A signposting and support resource would be exceptionally useful here.

Gaps in the Government's Open Data policy thinking

There is little in the consultation document about:

- ✧ non-commercial uses of data
- ✧ how this will play out at a local level
- ✧ specifically how open data is to link with open public services

1. Government should be aiming to stimulate social innovation and public service improvement through the release of open data – and this will require a different approach to opening data for commercial purposes

Stimulating commercial markets is different to stimulating social markets. How can government support social innovation and public service improvement uses of open data?

Resource it: Obviously. Funding 'front-runners', linking with organisations like the Nominet Trust to enable public sector and third sector to test out their ideas – with strong emphasis on evaluation. Develop work such as NESTA's Make It Local.

Structural/policy levers: use ability to set the policy landscape to proactively stimulate the market for social/public service improvement uses of open data. E.g.

- ✧ explicit statement that open data is intended to contribute to public service improvement and social change as well as stimulating commercial uses
- ✧ significantly strengthen the expectations around social value (Chris White Bill, new Best Value Guidance, strengthen Duty to consider social value)
- ✧ use central & local purchasing power to shape the market for use of open data to focus on social improvement
- ✧ specifically, embed these three in local commissioning & procurement structures or frameworks
- ✧ include supporting social use of open data in new funding mechanisms such as SIBs or payment by results
- ✧ use government's connecting power to link technical people with voluntary sector

organisations with ideas

- ✧ promote the excellent examples and resource evaluation and dissemination of the exemplars
- ✧ When seeking to open data from all public service-providing organisations it is important that all suppliers are treated the same but that requirements are proportionate and reflected in funding arrangements

Additional question: How can government support the voluntary, community and social enterprise sector to make the most of open data?

- ✧ Commission a resource that both identifies (signposts) existing data sources, and provides support to users on how to make effective use of the data to underpin funding bids, demonstrate impact etc. This would support policies on devolving power to communities, in particular the Community Right to Buy, Community Right to Challenge, Neighbourhood Planning and Participatory Budgeting.

2. Open data does not automatically equate to transparency or accountability. Open data does not automatically result in improved services. It is a means to an end.

Simply publishing swathes of data will not, alone, result in transparency or accountability – the vast majority of people will not be able to use data as it is, and relying on 'people who can' to translate, interpret and share the data more widely is likely to be patchy, biased and focused on a specific interest rather than an overall objective view.

There will be a tiny percentage of 'the people who can' that will be motivated to use open data to hold government to account. This can be part of your accountability strategy, but not the sum total of it.

Open data could indeed enable better research, greater innovation and stimulate public service improvement but this may not happen simply through the publication of an increased amount of information alone, even if in machine-readable format.

The evidence from open data services at national and local level is that there is little impact as yet on mainstream public service delivery. Unless the benefits for local agencies

and services to publish their data can be better demonstrated and supported, the risk is that open data becomes identified as a duty, and not seen as providing a benefit. The evidence from small-scale pilot projects such as the [NESTA Make It Local](#) work is useful in “banging the drum” for open data, but more could be done to demonstrate the benefits in practical terms.

Different stimuli will be needed to ensure that open data can help produce public service improvement, as well as the transparency and commercial opportunities which have been focused on. See bullets under point 1. In addition there needs to be a really clear understanding of what government means when it talks about open data and accountability – including the limitations of this approach.

3. Open data in its raw form is not accessible for the majority of people – therefore careful thought about what is published, in what format, to what end and to what audience.

Presentation matters. Being clear about why you are publishing data matters.

Data users are important. The emphasis on getting large quantities of data out into the open is welcome, with notable successes being the spending data. However, there is a relatively small audience for raw data (for example, VCS groups are unlikely to be direct users of JSON or other open-format data), and it is not a given that the energies of commercial developers will go into providing tools for public service providers and/ or commissioners.

One group that should be better engaged in the open data process is “data users”, by which we mean those public (e.g. economic development teams), commercial (e.g. research organisations), academic and third sector groups who are primary users of data and information for improving services.

- ⤴ These groups provide a critical link in the chain from raw data through to service improvement – and would be able to provide additional useful input into what information exists, what is useful, and how it can be used.

4. Open data is not cost free

Open data is often touted as a no-cost solution. However although technical costs are low for publishing and hosting datasets, this radically underestimates total costs. For example, the US www.data.gov service reportedly costs \$4M per year¹, and when assessing the burden of collecting data, the LGA estimated LAs were in many cases spending more than £1M per year on collecting monitoring and regulatory data to report to central government². In other words, data is not free, even if the technology to disseminate it is effectively free. Local Authorities and other public bodies are under immense financial pressure, so may struggle to prioritise releasing open data.

The same is true in central government. From my experience working in one central government department, data will be held in hundreds of different ways, in hundreds of different formats, by hundreds of different people (who will also be constantly changing). The time and effort required to collate this information and ensure that it can be kept up to date is absolutely massive.

- ✧ Again, priorities will need to be set, and careful thought given to what is published and why before this can be tackled.

Opening up data from other public service-providing organisations. For VCS there is a big challenge around resourcing, capacity and skills – groups acknowledged that there would be extra work needed both to share or open their own data and to make good use of other published data and open data. For groups that do not already have significant data collection, management and analysis in their operational model this is likely to be the biggest challenge. And at a time of increased demand and reducing income, the benefits to the frontline delivery of any additional work need to be much clearer.

- ✧ When seeking to open data from all public service-providing organisations it is important that all suppliers are treated the same but that requirements are proportionate and reflected in funding arrangements.
- ✧ And the additional costs will need to be reflected in funding and commissioning arrangements.

5. Much of the work around opening data will take place at a local level – this is almost entirely absent from the consultation. Leadership on the local element is key.

While understanding the principle of Localism, it is extremely telling that there is little or nothing in the consultation about the local element of this, and that CLG's Guidance on Local Data Transparency came out separately to Cabinet Office's consultation.

- ✧ It is essential that CO and CLG work better together on this issue.

Areas like Brighton are embracing the open data agenda, but, more is needed on clarifying what we mean locally by open data, setting out a collective ambition and starting conversations on how to get there. We should also remember that this is not separate to existing work on understanding our local areas and neighbourhoods, and to improve services.

There is a need for local leadership to turn general commitments into a strategy that complements work on city-wide intelligence or data stores, broadening sources of data for needs assessments; uses local government leadership and purchasing power to stimulate social uses of open data, and links the VCS and communities to the tech and developer community.

- ✧ Clear and ambitious leadership from the Local Government Group, and from CLG on this is essential. SOLACE, LGIU, and other local government think tanks could also contribute.

6. Open data and the potential benefits (and risks) are not well understood

Awareness: Most of the groups we worked with on the DataBridge project were aware of the concept of open data in terms of opening-up access to additional data held by public bodies. However, there was a disconnect between this general perception, and understanding how the open data agenda might help their work specifically.

Groups tended to list all the information they believed that local government holds that would be useful to them, plus a longer list of information they wished local government held. There is a limited understanding outside of local government of what specific datasets exist within local government. Work emerging from Department of Communities and Local Government on a [Code of Recommended Practice for Local Authorities on Data Transparency](#) includes

'an expectation' of a local Inventory of Public Data.

- ⤴ Local level creation of a useable, accessible local inventory of public data will be useful, but must bear in mind a range of users and levels of technical skill.
- ⤴ This could build on existing local work e.g. the [Brighton & Hove Open Data list](#) and [Brighton & Hove Local Information Service](#). As well as listing published data, it would be helpful to list the main data-sources held internally that are not published.

Some groups were sceptical about the value of open data at all because of the problems they see with existing datasets. For example, the issue of LGBT disclosure, recording of LGBT status and consistency of approach between services.

Risks: Loss of advantage or independence – questions were raised about sharing data in a more competitive environment, especially in terms of competing with other organisations or private providers. This is made more complex by a commissioning environment which is in some cases moving towards preferring collaborative or consortia bids. In this situation, sharing data is seen by some as giving away one of their key assets and potentially risking the independence of the organisation.

7. We need to make better use of the data we have – and in some cases, support people to do so. A signposting and support resource would be exceptionally useful here.

Using what's already available - The groups we worked with on this project often struggled to find existing data sources. For example, several groups requested data on populations they work with. In many cases, they are aware that information is available, but is difficult to find (and some highlighted that it is was complex to use).

- ⤴ There is a dual need here, for better awareness of existing sources with support to use them, and for the VCS to focus more on data and analysis as part of their core business planning and management.

Local Information Systems exists in most areas as a repository of local data, but are of varying quality and in many cases do not currently serve VCS audiences very well and does not include VCS data.

Data held by VCS - each group in the project highlighted data they held that could be useful for other organisations in the city, and potentially be published. While there is the option that this can be included in any data store or platform established by the City, there will be a great many questions to be worked through in the development phase.

These will include:

- ⤴ understanding the benefit to organisations and beneficiaries (of the data being made available);
- ⤴ teasing out issues around impact on organisational independence and competitiveness (does the data provide useful information to potential competitor organisations)

There will always be differences between quality and robustness of data, but it is important for decision makers to be open to understanding and using all the data we have, especially for service planning and commissioning. For example, information on emerging or future needs is inevitably going to be less robust than historical information on service use, however both are important in the context of commissioning.

- ⤴ CLG should consider commissioning a support resource to help voluntary organisations make better use of the data and research currently available.

1 Quoted in <http://www.guardian.co.uk/news/datablog/2011/apr/05/data-gov-crisis-obama>.

2 LGA (2010). Single Data List Consultation: LGA response.

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