

LONDON BOROUGH OF REDBRIDGE COUNCIL AND CEO RESPONSE

COUNCIL RESPONSE

Our approach to open data

Our approach to open data is a commitment to publishing all (legally permissible) data to extend accountability and public engagement. We also believe that, making that public data very visible is, paradoxically perhaps, most useful to the bureaucrats and politicians. The best way to know what the organisation you are in charge of is doing is to insist that, like the Centre Pompidou in Paris, all the innards are stuck to the outside of the building for all to see. Then you start to notice it yourself.

Our core aim is to tap into the sea-change in the approach of governments worldwide to public data. This is welcome, and Redbridge has become a leading player in making previously hidden information visible to the public. Other key aims include:

- Meeting Government expectations to publish data
- Meeting public expectations for greater openness from public authorities
- Increasing openness and clarity may help to increase public trust
- Addressing public concerns about information held on citizens
- Saving time and money by streamlining/replacing multiple internal data publishing systems.
- Saving time and money by pre-empting FOIs
- Working in partnership with others to make our data publishing platform available to other local authorities and public sector organisations.

We believe that there should be a public presumption (or formal duty on public sector organisations) in favour of open publication by default, with restrictions limited to personal datasets. However, we are concerned that while the publication of multiple CSV /excel files may be welcomed by the technically adept, the format, without contextual information, may prove inaccessible to a lay user. Therefore, we have developed a new online platform for the accessible publication of all of the (un-restricted) data we collect and store. Our [DataShare](#) platform has been designed to provide a flexible schema capable of meeting the publication needs of public sector organisations with hundreds, if not thousands, of complex datasets. The application has been designed to provide users with an understandable top level structure, simple visualisations and multiple reporting options.

The Government could provide additional incentives and lead by example. As a local authority we produce over 200 separate data sets in prescriptive, sometimes

exclusive, formats for Government departments annually. If the Government were to commit to extracting the performance data they require direct at source and/or unify the required format/presentation of this data.

In respect of personal data, consideration may be given to providing greater incentives for individuals to take control of their own personal data via cloud based applications such as that developed by MyDex. Placing responsibility for access to personal data with the individual may increase public confidence.

An independent body (such as the Information Commissioner) with enhanced powers to challenge decisions not to publish data may assist in increasing the amount and range of data that is openly published. We believe such a body should also have a role in supporting/enforcing accessible standards, including formats and presentation in the publication of data.

With regards to current fees and charges in respect of FOI requests, we would suggest that a presumption in favour of the publication of all but exempted/exceptional data should result in fewer FOI requests. If this were accompanied by an understanding that where all non-exempt data is published by default, those seeking information are required to establish that it has not been published before submitting an FOI. In order for this approach to be successful, the published data sets will need to be accessible and presented within some form of context if the lay user is to find the information they require. Analysis of our FOI requests indicates that there are a number of frequently asked questions or frequently targeted categories. For example, the following are categories of high public interest, likely to be applicable across the sector:

- A detailed breakdown of the council's and schools' employees;
- A summary of children in care
- An itemised breakdown of financial information
- A breakdown of school related information
- A detailed, location-based geographical information dataset;
- A location-based council activity dataset

There are significant benefits to the public sector organisations in increasing the amount of information that may be exempt from FOI requests. Proactively publishing de-personalised information relating to frequently asked FOI's may generate significant efficiencies. It is estimated that in 2008 the cost of processing FOI requests within local government was in excess of £34m. Should the above approach be adopted, the FOIs that remain are likely to be more complex and require more time to address. This may well require a review of charging policy. Detailed proposals with regards to fees and cost limits should be the subject of further consultation.

We agree that procurement rules for future ICT contracts should ensure that data extraction is easier and cheaper. Again, an 'open by default' duty on public sector organisations will reinforce the need for data extraction clauses in ICT contracts and

may well provide incentives to demonstrate data extraction models from private sector providers.

Our [DataShare](#) application provides an online by default publishing and performance management tool capable of meeting the complex needs of local authorities and other public sector bodies. We would therefore, suggest that the solution to accessible, cost effective open data publication may not necessarily be found only in the private sector. The Open Data Corporation may have a role to play in setting appropriate standards for the publication of open data. In terms of resource issues, it may be helpful if the Government/Public Data Corporation were to endorse/champion a particular approach/set of standards.

The Data Corporation may also have a role in the development and promotion of an independent developer community, through prizes/competitions/funding of winning proposals. This could result in new, publicly accessible, tools and visualisations being created from published data sets which may increase public interest and authority accountability.

One important aspect of the Government's approach to open data, not explicitly addressed in the consultation, is the potential requirement for monitoring and evaluation systems post implementation. This might cover everything from keeping abreast of tools/visualisations created from raw data, through to the development of an ROI formula, data valuation and charging policies.

CEO RESPONSE

Dear Sir,

London Borough of Redbridge's response to Making Open Data Real consultation

We are committed to the total and transparent release of the information we hold to enhance public engagement with citizens, and increase the understanding of the authority and the services it provides.

Our Data Transparency Strategy sets out our commitment to make all the Council's appropriate data accessible and understood by the public and is underpinned by the following core principles:

- To publish all data, unless there is a compelling personal or legal reason for keeping it confidential;
- Government returns to be published directly on our website, Redbridge i;
- Data must be presented with contextual information;
- The Council must not be prescriptive in assessing the value of data;
- To facilitate public requests for data;
- That the Council becomes a leading player on this agenda.

This approach and commitment is reflected within our response to the consultation as detailed below.

General Questions

The presumption should always be to publish data, however, when a decision is being taken as to whether to make a dataset open, we believe that current legislation should be followed, e.g. Freedom of Information and Data Protection Acts. Data should not be released if it would be exempted under these Acts. Should the Government consider setting core standards on release of data, the Cabinet Office's Business Impact Level (BIL) tables on protective marking could be considered.

If the costs to publish or release data are not judged to represent value for money, we believe that the requestor should be required to pay for public service data in line with existing Freedom of Information Act provisions.

The raising of public expectations of what data should be made available to them and primary legislation are likely to be the most effective methods of ensuring publication of data by public service providers where there is resistance.

Enhanced right to data

We do not believe that the Information Commissioner would require additional powers to safeguard the right to access and right to data as the legislation they currently mandate is sufficient. Increased fines and stronger consequences of non conformity than those already in place are unlikely to force public bodies to release information. As stated above, using increased public expectations on data release will introduce a level of local accountability.

Existing safeguards to protect personal data and privacy measures are adequate to regulate the open data agenda.

There are organisational challenges and resource implications in maintaining and introducing data sets, particularly in the provision of historical and paper based records. There is also concern if a requirement was introduced to provide information we do not currently hold, as this is likely to incur costs to obtain, analyse and represent the information. This is particularly relevant to information used to compare authorities such as user satisfaction, performance etc, if it is not collected or presented in a standard format.

Embedding open data into all contracts may have a cost implication if contractors and providers do not have sufficient systems in place as they are likely to pass on any additional burdens to the commissioner within the cost of the contract.

Setting open data standards

There is a need to set common standards for all public bodies on the quality, accessibility, usability and timeliness of the data that should be released, with less prescription of the types of data.

We have set a high standard within Redbridge on how our data is made available and its usability through the internal development of our Data Share software application which is hosted on our website.

Data Share provides the following unique benefits to the public:

- It enables the public to interrogate data online, with a facility to set their own search criteria;
- The public will be able to submit their ideas and requests for data sets;
- The potential to avoid registering FOI requests and awaiting responses;
- For the software developer community to produce new applications and visualisations, for exploitation by the public and the Council.

Corporate and personal responsibility

Meeting the open data agenda requires a cultural challenge within organisations which should form part of their own internal governance.

As detailed above we have adopted a Data Transparency Strategy which sets out our commitment to make all the Council's appropriate data accessible and understood by the public. This is also underpinned by a Data Quality Strategy. Chief Officers within each Service Area are responsible for signing off the quality and release of service specific data, with the assumption that all Council data will be made public, unless there is a stated rationale for not doing so.

Any requests for exemptions or redactions (not covered by existing legal restrictions) must be referred to our Redbridge i Board, which I chair.

Directors have identified which data sets they hold and their data owners and an ongoing programme is being developed to publish these data sets. Our Management Board and Cabinet Members will receive regular reports of data set publications to ensure momentum is maintained and the publication strategy evolves in line with corporate priorities.

Meaningful open data

Using systems such as Data Share to store and publish data enables the public and other bodies to easily see what data we hold and how it can be accessed. Data is categorised and our Publication Scheme links to Data Share. Use of these systems negates the need for duplicate inventories.

The introduction of the single data list should have identified data that is unnecessarily collected.

Using data for comparison purposes between public bodies will require some set standards on timeliness, format and definitions. However, these standards should not become so prescriptive that they introduce additional costly burdens, but should be in the interest of making data available that the public can easily and intuitively make sense of. There needs to be a balance between accuracy of data and the time taken to publish it. A defined Data Quality Strategy and clear sign off arrangements should be in place.

Government sets the example

Government should store information they hold in a central portal as the public are unlikely to know what individual Government departments do in detail. However, Government do not need to hold information on behalf of local authorities. Local authorities should not be sending data to anybody. The data should be published on each Council's website in an agreed format, so that any interested party can use it. The Local Data Panel, of which I am a member, has been established to lead on these matters and has also emphasised this point.

Innovation with open data

There are a number of ways in which Government can stimulate innovation in the use of open data, including:

- Encouraging public bodies to publish their data on their own websites, removing the burden of submitting data to various bodies and Government departments;
- Encouraging the software developer community to produce new applications and visualisations, for exploitation by the public and public bodies;
- Publishing examples of good practice and innovation;
- Encouraging the public to access data and manipulate it to best meet their needs.

I hope that you find these comments useful.

ROGER HAMPSON
CHIEF EXECUTIVE

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