

## **Making Open Data Real: A Public Consultation**

### **A response from the National Institute of Adult Continuing Education to the Cabinet Office, October 2011**

The National Institute for Adult Continuing Education (NIACE) is a membership organisation whose purpose is to support more adults to learn and benefit from learning throughout their lives. Adult learning encompasses a breadth of provision from formal to informal; including learning that is embedded in, or occurs as a consequence of other activities. Whilst much of this provision happens in formal or private settings such as colleges or the workplace, a sizeable proportion is delivered by public and third sector organisations, based within community settings.

NIACE believes that the open data movement offers considerable potential for providers of learning to not only enhance, inform and improve their provision for learners, but also to enable them to provide better, more targeted and more diverse learning opportunities. It also signals a significant change in mind-set amongst those running many public services in that it should enable and support a different set of accountabilities; rather than being accountable 'upwards' towards central government, this movement is about being accountable 'outwards' towards service users, communities and stakeholders. This is a move which NIACE strongly supports and is working on in the world of adult education. Because of this, the current drive towards transparency and accountability makes it more important for organisations to engage with open data as users, creators and curators.

This move, however, will not be achieved by simply making raw data available. In order to support improvement, data must undergo the transformation from statistics, to information and ultimately to knowledge that can be used to inform public judgement. This transformation raises issues such as value, validity, accessibility, contextualisation, interoperability, comparability, and provider capacity, which must be addressed. To this end, NIACE have been working in partnership with AoC, AELP and Hoxex (with support from 157 Group and the IfL) to develop a Further Education Public Information Framework in order to contribute to the wider push to increase choice, demand and accountability.

NIACE welcomes the open data public consultation as a positive step in drawing providers closer to a state where they are competent, confident and comfortable in their ability to make appropriate use of data for their individual needs, and those of their learners and beneficiaries.

#### **Overview:**

Whilst open data offers a unique opportunity for organisations and individuals to enhance their provision, engage with their beneficiaries, and better understand and respond to the social market, there are still a number of issues which must be addressed:

#### **Consideration of the social market for open data:**

The language of the consultation document seems to address only the needs of an economic market for open data. Whilst this may be a matter of interpretation, it should be noted that a lack of consideration of the social context/market would only serve to alienate aspects of the third sector. The assumption that market forces and innovation will drive open data use is also likely to be challenged.

Providers find themselves in a climate of competition, within which protection of market intelligence and efficiency data is a default position, particularly where competition is opened up to other sectors. Therefore, unless government offers meaningful incentives such as seed funding, and promotes partnership working and resource-sharing across sectors, it is likely that the opening up of data will be considered a burden and not a benefit.

#### **The importance of proportionality:**

When considering provider responsibility in terms of open data, a 'one size fits all' approach will not breed results. The guiding principle should be that requirements are proportional, both in terms of organisational contract and their capacity to deliver. In the first instance, this might be achieved by placing greater responsibility with the principle contractor, rather than with sub-contracted providers.

#### **Support for skills-development and knowledge:**

If Open Government Data is to meet Big Society objectives, its opening up and use should be about more than simply 'availability' of that data. Genuine access requires that data is presented in a form that communities and individuals can not only acquire and download, but can also easily understand and repurpose<sup>1</sup>; ideally, this should be free at the point of use. Moreover, to be able to access even the most clearly presented data, providers will require support to present the data (skills, knowledge, and technical infrastructure) and learners will require support to access, understand and use it. Equally, efforts will need to be made to create clear understanding of data protection, in particular issues of privacy and anonymity where organisations work with vulnerable and 'at risk' groups.

#### **The importance of stimulating value construction:**

Currently, for the majority of providers and users, open data is de-contextualised. It is a requirement of transparency, but little effort has been made to support organisations to

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<sup>1</sup> For a clear picture of how this fits with Big Society, see NIACE Policy briefing: *Learning for a change: Why adult learning will make the Big Difference to the Big Society*: 5, at <http://www.niace.org.uk/policy-paper-learning-for-a-change-why-adult-learning-will-make-the-big-difference-to-the-big-socie-0> (accessed 27.10.11)

construct a value proposition. Investment should be focused upon helping organisations understand the potential value of open data both to their operations and to their beneficiaries. Engagement with open data will require targeted, community-level interventions, focused upon constructing value and changing information behaviours. Equally, efforts should be made to ensure providers embed open data principles at a strategic level. This should run alongside comprehensive awareness raising interventions, clear and accessible support materials, external input to stimulate construction of value and skills-development amongst all relevant staff to ensure that open data knowledge does not become siloed or held by one individual.

**Linking open data to public information and social accountability:**

A stronger presumption in favour of publication of open data is likely to be achieved through more explicit links between open data, open public services, public information and social accountability. By embedding open data within this wider narrative, it may be possible to support more meaningful engagement across public and third sector organisations. This should be supported by a greater drive, at the local level, towards engaging citizens, through meaningful forums and visibly responsive service providers.

**Understanding data literacy:**

Finally, in order to better understand the support organisations and individuals will need to make use of open data, it will be necessary to conduct research into what it means to be data literate, both at an organisational and social level.

However, the ultimate goal of open data should be the support of social accountability. To this end, attention needs to move *beyond* transparency, *towards* the capacity of citizens and their representative groups to *meaningfully engage* with government, understand the data and underpinning systems, and plan and negotiate change. However, such a transition requires not only an empirically-grounded understanding of the nature of capacity and capability, but also the development of social instruments that support, enable and inform that development.

## Glossary of Key Terms:

### 1. Do the definitions of the key terms go far enough or too far?

The key terms are clear and sufficient at this stage.

### 2. Where a decision is being taken about whether to make a dataset open, what tests should be applied?

#### Key Points:

- Initial expectations should be proportional based upon (a) the size of providers' contract/ sub-contract, (b) their 'capacity' (skills/knowledge, infrastructure, and margin) to make data open.
- In the cases where a subcontract is held, responsibility for 'opening' datasets should lie with principle provider (e.g. the local authority).
- Additional support should be made available to those organisations working with 'at risk' and 'vulnerable' groups to support data privacy/ anonymity.

#### Rationale:

The key consideration here is that the dataset is not judged in isolation from the context within which it is generated. The breadth and diversity of public service providers means that there is a danger that unequal expectations may be placed upon organisations. In reality, the skills and resources required in order to make a dataset open are likely, certainly in the first instance, to place considerable demands upon providers previously not subject to such requirements.

In light of this, proportionality should be the guiding principle. There should be a distinct difference between what is expected from different organisations on the basis of turnover and level of contract (for example, Adult and Community Learning providers, private training providers, local authorities, and Further Education Institutions).

In particular, where aspects of public services are sub-contracted to smaller providers, the responsibility of data curation may be disproportionate to the funding received. That is not to say, however, that smaller institutions should be any less subject to the rigours of transparency. Rather, there should be early consideration of the skills and resource requirements of smaller organisations and, until those needs are met, the locus of responsibility should rest with primary providers, such as local authorities.

Further, where organisations work with ‘at risk’ or ‘vulnerable’ groups, the potential for harm arising from data mismanagement is heightened, both in a practical and reputational context. It is critical that ongoing support be made available to aid knowledge and skills development in respect of privacy and data management practices.

**3. If the costs to publish or release data are not judged to represent value for money, to what extent should the requestor be required to pay for public services data, and under what circumstances?**

**Key Points:**

- Charging for open data excludes those who cannot afford to pay, likely to result in a ‘data divide’.
- Simply making data ‘available’ is not enough to engage disenfranchised communities. Efforts must be made to engage all aspects of society.
- Engagement with open data will require targeted, community-level interventions to focus upon constructing value and changing information behaviours.

**Rationale:**

To some extent the question assumes a level playing field. The term ‘requestor’ effectively obscures the range of individuals likely to be making use of Open Data. The danger inherent in this is that those individuals already disenfranchised within society are likely to have less capacity to pay for this information, thus raising concerns over the potential of a ‘data divide’, where only those who can afford to can access the range of data available and thereby make meaningful judgments about their public services.

Expecting that all individuals within society will see the relevance of data (or even public information) to their lives is also a flawed assumption. Relevance is constructed not only at an individual, but also a community level and is influenced by complex and compound factors.<sup>2</sup> Information poverty (defined broadly as a lack of access to information due to skills, knowledge or value deficit)<sup>3</sup> can create capacity divides within society. These divides are amplified when individuals are already alienated from spheres of society,<sup>4</sup>

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<sup>2</sup> Jaeger, P. T, and K. M. Thompson (2004) *Social information behaviour and the democratic process: Information poverty, normative behaviour, and electronic government in the United States*. Library & Information Science Research. Vol.26: 94–107

<sup>3</sup> Goulding, A. (2001). *Information poverty or overload?* Journal of Librarianship and Information Science, Vol.33: 109–111

which suggests that building capacity is unlikely to be achieved through simply making data available.

Equally, information norms, understood as the “pattern of one’s information behaviour”<sup>5</sup>, draw directly from one’s social sphere. If an individual exists solely within a sphere of information flows internal to their community, as tends to be the case within disenfranchised communities,<sup>6</sup> engagement depends upon a *reconfiguration of information behaviour*.

Further, whilst information poverty and information norms are both inhibiting factors, they are particularly amplified where they interrelate; so, individuals who experience a community within which information poverty is a norm are unlikely to transcend that state without support.

Therefore, any expectations that data ‘access’ will automatically translate to data ‘use’ needs also to consider the cultural, community and educational context within which individuals operate.<sup>7</sup> Without investment in, or support of, community-level interventions targeted at changing behaviour and constructing value, it is likely that data divisions will become deepened and entrenched.

**4. How do we get the right balance in relation to the range of organisations (providers of public services) our policy proposals apply to? What threshold would be appropriate to determine the range of public services in scope and what key criteria should inform this?**

**Key Points:**

- The setting of a threshold is critical to ensure less equipped organisations are not marginalised.
- It may be necessary to link this responsibility to a funding threshold/organisational turnover so that organisations receiving small scale funding for sub-contracted aspects of public services have commensurate responsibilities in terms of data-publishing and management.

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<sup>4</sup> Jaeger, P. T, and K. M. Thompson (2004) *Social information behaviour and the democratic process: Information poverty, normative behaviour, and electronic government in the United States*. Library & Information Science Research. Vol.26: 100

<sup>5</sup> Jaeger, P. T, and K. M. Thompson (2004) *Social information behaviour and the democratic process: Information poverty, normative behaviour, and electronic government in the United States*. Library & Information Science Research. Vol.26: 100

<sup>6</sup> *ibid*

<sup>7</sup> Jaeger & Thompson (2004); Peruzzotti (2007); ANSA-EAP (2010)

**Rationale:**

Currently, whilst the Public and Third Sectors are definitively distinct, in practice they do not stand alone. Over the past 10 years, through closer and more interwoven collaboration with government, the third sector has become a critical partner in public service modernisation and delivery,<sup>8</sup> thus becoming increasingly interwoven with public sector institutions.<sup>910</sup> In 2006/7 one quarter of voluntary sector organisations were in receipt of some level of state-funding; the majority of which related to the provision of public services<sup>11</sup>, often subcontracted from larger providers.

Subsequently, the term 'providers' is likely to represent a diversity of organisations with varying levels of funding and infrastructure, and often subject to a range of data management requirements resulting from being the recipients of multiple funding streams.

It is critically important therefore, to set a threshold in order that the same expectations are not levelled across the board. The time and resource demands of effective data creation and curation are considerable and require specific skills and technical infrastructure. As such, it may be necessary to link this responsibility to a funding threshold/organisational turnover, so that organisations receiving small scale funding for sub-contracted aspects of public services have commensurate responsibilities in terms of data-publishing and management.

Equally, locating responsibility with larger sub-contracting providers brings with it the greater likelihood of long-term consistency in terms of data generation/curation, as there is no certainty that sub-contracts with smaller providers will automatically be renewed.

## **5. What would be appropriate mechanisms to encourage or ensure publication of data by public service providers?**

**Key Points:**

- Ensure that all providers have appropriate and sustainable technical infrastructure in place.

<sup>8</sup> Clark, J., J. Dobbs D. Kane and K. Wilding (2009) *The State and the Voluntary Sector; Recent trends in government funding and public sector delivery*. [NCVO](#)

<sup>9</sup> E.g. in 2009, this investment was approximated at 12bn (though this represented only 2% of govt expenditure across all public services)

<sup>10</sup> Ibid p.10 (NCVO estimate that 75% not in receipt of govt funding)– Public service delivery has dominated the funding climate.

<sup>11</sup> Clark, J., J. Dobbs D. Kane and K. Wilding (2009) *The State and the Voluntary Sector; Recent trends in government funding and public sector delivery*. [NCVO](#) : 16-17

- Engagement with open data needs both top-down and bottom-up stimulus. Efforts need to be made to support the construction of a value proposition from within the providers themselves. This can be stimulated through external awareness raising and support.
- It is unlikely that there is currently sufficient capacity (skills, technical infrastructure, support) within the sector to meet the challenges posed by open data. Support must be offered so that a commitment to open data is addressed at a strategic level (providers' internal strategies).
- Efforts must be made to support a culture change amongst providers. Interventions to raise awareness and promote the benefits at an organisational level would help.
- There needs to be further research conducted into what it means to be 'data literate' as the skills profile is likely to be 'spiky'; both in terms of minimum and specific requirements. Understanding this would enable support for organisations to develop internal training programmes.
- There should be some recognition that individuals are uncomfortable with numbers. Casting open data as a means, rather than an end in itself would enable further engagement.
- This is not solely the work of government. Key intermediary organisations (such as NIACE) should take the lead supporting value construction and proactively promoting the use of open data.

#### Rationale:

In order to identify the appropriate mechanisms, it is helpful to consider the obstacles which might limit organisational engagement with open data. The following suggestions are grounded in NIACE's experience of supporting the development of technology-adoption amongst local authority and voluntary and community providers:

1. **The meaningful use of open data *depends upon technology***; so, a solid technical infrastructure within the sector is a necessary antecedent to organisations being able to make use of open data. Therefore, ensuring that organisations are equipped with adequate technical infrastructure is critical if open data requirements are to be met.
2. **Engagement with Open data *depends upon value construction***: Similar to the debates around the integration of technology within organisational practice of the mid 1990s, there are currently more external (expert) forces explaining the anticipated *use* of open data than there are internal thoughts about how it might actually be *useful*. Until that internal value deficit is challenged, progress is likely to be limited. Therefore, investment in helping organisations both understand the potential of open data and to



construct their own value would be a key first step to encouraging the publication of open data.

3. **Building internal capacity:** It is unlikely that there is currently sufficient capacity (skills, technical infrastructure, support) within the sector to meet the challenges posed by open data. As a value model is developed, so it is likely that resources will be allocated to meet the resulting need. In the short term, however, providers would benefit from some form of stimulus to embed data management within their organisational strategies.
4. **Likely to require a culture change:** As was the case with technology adoption, it is likely that open data will potentially require a change in culture. For example, in order to move from 'niche' to 'mainstream', technology needed to be seen as a mechanism/enabler rather than an end in itself. It is likely that this will be equally true of open data. For example, NIACE case study research into the use of shared MIS amongst organisations has indicated that principle barriers to data sharing are not necessarily technological, but relate more to protocols, ownership, and use of that data, therefore slightly out of step with notions of 'openness'.

The Open Data Master Classes<sup>12</sup> (a partnership between The University of Nottingham, NIACE, Ordnance Survey, ESRI and The Royal Geographic Society [with IBG]) sought specifically to involve the Public and Third Sectors. The post event survey suggested that participants found the context-setting to be of particular benefit. Whilst this specific intervention focussed primarily upon geographic information, it is likely that a similar programme, focussing upon datasets relevant to the sector (e.g. skills, health, etc) would help to promote the value of open data, both from the perspectives of publication and use.

5. **Likelihood of a 'spiky' skills profile:** The skills profile of a 'user' - an individual competent, confident and comfortable in the use of Open Data – is likely to be 'spiky' and require a composite set of 'literacies'. The term 'spiky' is intended to illustrate that, as with ICT skills, not everyone will require the same skills profile. In order that organisations engage fully with open data, it is important that some effort is made to understand (a) what does it mean for an individual to be fully data literate, and (b) what is the minimum level of knowledge and skills required in order to engage *meaningfully* with Open Data?
6. **Resistance to Numbers:** NIACE research and anecdotal evidence shows us that people are uncomfortable with numbers, and that they are currently comfortable in admitting this<sup>13</sup>. So, if we expect individuals and organisations to engage with open data, we must be prepared to stimulate and support a 'shift' in attitude if we are to turn the 'audience' into 'users'.

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<sup>12</sup> Open Data Master Class Handbook

<https://www.horizon.ac.uk/images/stories/open%20data%20handbook%202011.pdf>

<sup>13</sup> Niace Committee of Inquiry on Adult Numeracy Learning (2011) *Numeracy Counts*. Niace: 4

Finally, construction of value and support for sectoral development should not be a task solely for central government. Key intermediary organisations (such as NIACE) should take the lead supporting value construction and proactively promoting the use of open data.

## **An enhanced right to data:**

### **1. How would we establish a stronger presumption in favour of publication than that which currently exists?**

#### **Key Points:**

- A stronger presumption in favour of publication of open data is likely to be achieved through more explicit links between open data, open public services, public information and social accountability.

#### **Rationale:**

A stronger presumption in favour of publication of open data is likely to be achieved through more explicit links between open data, open public services, public information and social accountability.

Whilst the mechanisms for development of social accountability are complex, successful environments tend to be characterised by four pillars:<sup>14</sup>

- organized and capable citizen's groups, dependent upon motivated and informed actors (both civil society and state);
- responsive government - achieved through institutionalization of bidirectional communications between citizen and state actors, and cultivation of "horizontal and lateral relations within the state to work in concert";<sup>15</sup>
- access to and effective use of adequate and essential information; including building citizen capacity through forums and skills/knowledge/value development; and
- sensitivity to culture and context.

### **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?**

#### **Key Points:**

- It would be better to (a) support organisations learn about what regulations already

<sup>14</sup> Affiliated Network for Social Accountability in East Asia and the Pacific (ANSA-EAP) (2010) *A Manual for Trainers of Social Accountability*. Manila, Philippines: ANSA-EAP: 53

<sup>15</sup> Taeku Lee (2011) The (Im)Possibility of Mobilizing Public Opinion? In Odugbemi, S and Taeku Lee,[eds] (2011) *Accountability Through Public Opinion: From Inertia to Public Action*. Washington: World Bank: 15

exist, and (b) safeguard a right and access to open data by making use of existing bodies.

At this stage, the more pressing concern is to ensure that providers are aware of all existing regulations and infrastructure, including that emerging from the European Union, which can support them with data management. Support for privacy and anonymity should be the most pressing concern.

Whilst the establishment of an independent body would send a positive message about the government's commitment to the agenda, given the current fiscal climate and recent governmental contractions, it may be more appropriate and less costly to embed these safeguards within existing bodies and infrastructure.

**3. Are existing safeguards to protect personal data and privacy measures adequate to regulate the Open Data agenda?**

NIACE has no current position on this. However, ensuring learner/ beneficiary information and identity is protected is a critical issue, particularly in the case of vulnerable or 'at risk' groups. Debates related to data ownership and data breach are increasingly arising amongst providers.

This would be a good time to consider how best to ensure that organisations are fully up to date with (a) existing safeguards and policies, and (b) the most effective data management practices.

**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 of an enhanced right to data are highly dependent upon what data is to be defined as 'meaningful'. Whilst it is likely that organisations with a smaller margin will feel the burden more acutely than larger organisations, resource implications are likely to fall within the following categories: (a) staff time (b) staff skills (c) the need to develop knowledge at senior-management level, (d) technical infrastructure and (e) support for legal advice around data privacy.

**5. How will we ensure that Open Data standards are embedded in new ICT contracts?**

NIACE has no current position on this.

## **Setting Open Data Standards:**

**1. What is the best way to achieve compliance on high and common standards to allow usability and interoperability?**

NIACE has no current position on this.

## 2. Is there a role for government to establish consistent standards for collecting user experience across public services?

### Key Points:

- Whilst standards are important, it is more critical that mechanisms for collection of user experience visibly result in a response from services/ providers.

Developing a guidance framework for collecting user experience data would be an important first step in supporting organisations. However, this needs to be collected via multiple mechanisms. Whilst the crowd-sourcing of user experience is familiar to many, this is not necessarily a model that all individuals within society will be familiar/ comfortable with. For example, there are still 8.7 million people in the UK not online<sup>16</sup>, and given that data collection of this type tends to rely on online mechanisms, this is a potential sphere of exclusion.

Equally, whilst consistent standards are important, there is a danger that in much the same way as the push to open data has resulted in websites acting as data ‘dumps’,<sup>17</sup> this move may result in the development of unsuitable mechanisms that meet minimum standards without considering the purpose or application of that data. Further, where user data is collected, services should be visibly responsive to that data to better support social accountability.

It is more important, therefore, that mechanisms seeking to gather user experience should be responsive to a genuine need. A good example of this is The National Endowment for Science Technology and the Arts (NESTA) initiative, ‘Make it Local’.<sup>18</sup> These awards were designed to support four local authority/digital agency partnerships to use their data to create useful citizen-focused web-based services.

## 3. Should we consider a scheme for accreditation of information intermediaries, and if so how might that best work?

The development of a scheme for accreditation of information intermediaries would seem to be a high-cost, low-gain strategy and in some respects may be seen as somewhat contradictory to the notion of openness. Rather than investing in a new infrastructure, it would be more cost-effective to promote data provenance. The process of tracing and recording the movement of data can eliminate many of the potential validity/error issues arising from data that has become dislocated from its source.

<sup>16</sup> <http://raceonline2012.org/>

<sup>17</sup> Of the 434 councils in the UK, only 93 are open data councils, of which 87 are truly open - <http://openlylocal.com/councils/open> (accessed 20.10.11)

<sup>18</sup> [http://www.nesta.org.uk/areas\\_of\\_work/public\\_services\\_lab/make\\_it\\_local](http://www.nesta.org.uk/areas_of_work/public_services_lab/make_it_local)

## Corporate and Personal Responsibility:

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.

### Key Points:

- Government must step in to mitigate the associated privacy risks through stimulation of debate and clear guidance/ protocol as to how to take steps to protect anonymity of their beneficiaries/ learners.
- Training needs to run alongside (a) awareness raising amongst staff, (b) incorporation within provider strategic objectives, (c) clear and accessible support materials, (d) external input to stimulate construction of value and (e) skills-development amongst all relevant staff to ensure that open data knowledge does not become siloed.

As mentioned previously, privacy issues are particularly critical where providers work with vulnerable or 'at risk' groups. Issues of data privacy and questions such as 'who owns our data' are currently very much under debate amongst providers. The additional responsibility which accompanies the publication of social data creates a climate within which it is critical that such debates are brought to the fore and led by government. As data becomes increasingly sensitive, adherence to the data protection act becomes insufficient as a means of securing privacy. Data is increasingly dynamic, as are individual's expectations of privacy (based largely upon norms of appropriateness and norms of information flow),<sup>19</sup> and as such organisations should be able to protect sensitive data until a time that they are certain their beneficiaries/ learners are protected.

If providers are to honour a commitment to open data, government must step in to mitigate the associated privacy risks, through stimulation of debate and clear guidance/ protocol on how to take steps to protect anonymity of their beneficiaries/ learners.

In terms of ensuring providers honour a commitment to open data, as with engagement with any new responsibility, it is our experience that this requires (a) awareness raising amongst staff, (b) incorporation within provider strategic objectives, (c) clear and accessible support materials, (d) external input to stimulate construction of value and (e) skills-development amongst all relevant staff to ensure that open data knowledge does not become siloed.

<sup>19</sup> Nissenbaum, Helen (2010) *Privacy in Context: Technology, Policy, and the Integrity of Social Life*. [Stanford Law Books](#)

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?**

Efforts should be made to ensure that a commitment to open data is embedded at a strategic level. For example; through organisational strategies.

3. **Would we need to have a sanctions framework to enforce a right to data?**

**Key Points:**

- A sanction framework may send the wrong message. The approach should instead be supportive/enabling.
- The climate would benefit from a series of small incentives to stimulate good practice and innovation (preferably favouring cross-sectoral partnerships) and to prioritise engagement with the agenda.

**Rationale:**

At this stage, it is likely that the imposition of a sanctions framework would send out the wrong message to providers, particularly those for whom capacity is an issue. As previously suggested, engagement with Open Data needs to originate from amongst providers. In order for it to be seen as something worthy of investment, providers will require support and guidance in helping them both in the value-construction and the mechanics of opening up their data in a meaningful way. Equally, the climate would benefit from a series of small incentives to stimulate good practice and innovation (preferably favouring cross-sectoral partnerships) and to prioritise engagement with the agenda.

4. **What other sectors would benefit from having a dedicated Sector Transparency Board**

NIACE has no current position on this.

## **Meaningful Open Data:**

1. **How should public services make use of data inventories? What is the optimal way to develop and operate this?**

Any data inventory needs, beyond all things, to meet the need of the users and to reflect their information-seeking behaviour. Conversations with participants at the NIACE Informal Adult and Community Learning round tables suggested that a centralised approach to data would be most welcome if this was developed concurrent to a synthesis of data requirements across funders (government departments).

**How should data be prioritised for inclusion in an inventory? How is value to be established?**

NIACE has no current position on this.

**2. In what areas would you expect government to collect and publish data routinely?**

Spending, Education and Health.

**3. What data is collected “unnecessarily”? How should these datasets be identified? Should collection be stopped?**

In many respects, this is the critical issue. It is likely that what might be interpreted as *necessary* data will alter depending upon (a) the audience/ consumer/ user, and (b) the provider. One of the key matters therefore is to clarify the accountability relationship; for example, what do the beneficiaries require, in light of the practical parameters within which adjustments could be made to provision, and what data can help them to make those judgements. This is likely to be most effectively decided at the local level.

**4. 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?**

The answer to this question depends entirely upon how we define the ‘user’. If the intention is that government data is to be only of use to professional data-miners or organisations with existing high-end skill-sets, then polishing data may not be necessary. Conversely, if the expectation is that individuals within society are expected to make use of that data, then data should not only be polished, but presented in a way that is easily visually accessible.

**Government Sets the Example:**

**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?**

Currently, data is located in many different places making it difficult for users to find what they are looking for, or even to know what is available. A central portal would help.

**2. What factors should inform prioritisation of datasets for publication, at national, local or sector level?**

NIACE has no current position on this.

**3. Which is more important: for government to prioritise publishing a broader set of data, or existing data at a more detailed level?**

This is almost impossible to answer without conducting research into how data is currently being used. We are only in the early stages of open data use and we would benefit from further research being conducted into how individuals and communities make use of open data sets.

**Innovation with Open Data:**

**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?**

At this stage, the majority of developments around the use of open data amongst public and Third Sector organisations arise as a direct result of seed funding (see earlier Nesta example). Evidence shows that Open Government Data is “generally split between micro-enterprise and SME business in the private sector, local and national public sector institutions, and academic institutions, with a very limited representation of voluntary sector workers.”<sup>20</sup>

Creation of seed-funding opportunities would not only support providers to consider how their open data might be used, but it could also be used as a lever to promote cross-sectoral partnerships, thus helping to both broaden the user-based and neutralise some of concerns arising from the sector around protection of key information.

**Conclusion:**

NIACE would be pleased to supply further information and analysis about any of its responses. Please contact Ewa Luger (ewa.luger@niace.org.uk ) in the first instance.

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<sup>20</sup> Davies, Tim (2010) *Open data, democracy and public sector reform: A look at open government data use from data.gov.uk* at <http://practicalparticipation.co.uk/odi/report/wp-content/uploads/2010/08/How-is-open-government-data-being-used-in-practice.pdf> : 3 (accessed 20.10.11)