

NCVO Response to the Cabinet Office "Making Open Data Real" Consultation



October 2011

- 1 The National Council for Voluntary Organisations (NCVO) is the largest general membership body for voluntary and community organisations (VCOs) in England. Established in 1919, NCVO represents over 8400 organisations, from large 'household name' charities to small groups involved in all areas of voluntary and community action at a local level. NCVO champions voluntary action. Our vision is of a society in which people are inspired to make a positive difference within their communities. A vibrant voluntary and community sector (VCS) deserves a strong voice and the best support. NCVO works to provide that voice and support.
- 2 NCVO is responding to this consultation on behalf of our members – organisations who are keen to take advantage of the opportunities that open data offers, as well as empowering communities and citizens in being able to access a range of information that enables them to make informed choices about their lives. Our response focuses on the aspects of the consultation which have most relevance and importance for civil society rather than addressing every question asked.
- 3 NCVO believes that the emerging open data agenda offers real opportunities for voluntary and community organisations (VCOs) to improve the impact they have on their communities and beneficiaries. Opportunities exist in using data that public bodies produce and share, in using data as part of providing public services and in voluntary and community organisations sharing open data themselves.
- 4 The successful use of open data is not simply a technical process of "getting the data out there", and indeed open data is not an end in itself. A culture change is needed by the producers and consumers of data, both in terms of embracing the principles of open data and having the skills and capacity to do so. These ideas need time to embed in organisations, and a continuous two-way dialogue is needed between producers and consumers.
- 5 It is also important that the open data agenda is not seen in isolation to other government policies, such as localism and a diverse public service delivery model. Open data policies must complement these other agendas, and help voluntary organisations to play their part in them.

- 6 A number of different types of data are of use to voluntary and community organisations:
- Core administrative data, such as postcode and mapping data, allows organisations to map their operating environment and manage administrative tasks like a client database.
 - Relevant statistical data relating to need and deprivation allows organisations to improve the services they offer and target areas with the most need. An example of this is shown on the NCVO blog – Barnsley Hospice was able to better target its services by using data from the Index of Multiple Deprivation¹.
 - Data about voluntary and community organisations themselves – particularly the Charity Commission Register of Charities and other regulatory lists – which help organisations to be open and accountable to their donors, members and beneficiaries. NCVO itself is an example of this – we use the Charity Commission register to find out more about the sector and produce research like the Civil Society Almanac².

The quality of open data

- 7 Voluntary and community organisations do not have unique requirements for the quality of open data for it to be useful to them, beyond established open data principles. To maximise the value of open data for voluntary and community organisations, it needs to be:
- free to use, without restrictions on volume or scope,
 - openly licensed, enabling reuse on commercial or non-commercial terms,
 - accessible online in both human- and machine-readable format,
 - produced in standard open file formats,
 - and accompanied by clear and comprehensive metadata.
- 8 Data is most useful for voluntary and community organisations if they can reuse it and merge it with their own data sources. This will only be possible if it uses meaningful labels and values, with clear metadata, and common unique identifiers when identifying organisations and entities.

¹ <http://www.ncvo-vol.org.uk/networking-discussions/blogs/116/11/03/10/making-data-relevant-case-study>

² <http://www.ncvo-vol.org.uk/almanac>

- 9 There is a clear advantage, for example, in using a Charity Registration Number when referring to registered charities, and a Registered Company Number when referring to companies. Internal or proprietary identifiers should be avoided, and where unavoidable should be clearly explained.
- 10 Consistency of data structure and format is important for voluntary organisations. Many voluntary and community organisations, including very small ones, work across the country and interact with many different public bodies. For open data to be of most use to these organisations, allowing them to transfer best practice from one area to another, they need to be able to access consistent data from all these bodies.

Obligation to publish open data

- 11 It was suggested in the Open Public Services White Paper that organisations that provide public services through contracts with Government will be obliged to publish open data as part of their contract. NCVO supports greater transparency and accountability in all sectors, including voluntary and community organisations that provide public services.
- 12 However any proposals to oblige voluntary and community organisations to open data about the public services they provide need to be informed by proper consultation with the sector. NCVO members have expressed a number of concerns about creating an obligation, such as risks to their independence and competitiveness. Many have also commented that introducing a further mandatory requirement would increase the burden of their administrative processes.
- 13 It is important to get the right balance between accountability and regulatory burden. This area would benefit from more precise proposals about how an obligation to publish would work, and the opportunity for our organisations to respond to these. In particular, the Government should ensure that any obligations to monitor and publish data about public services are proportionate, relate to meaningful data about those services and do not damage the organisations' commitment to client confidentiality.
- 14 Additionally, any obligation to publish data about service provision should apply equally to the private and voluntary sectors, as concerns about competitive advantage relate to both. If organisations are not obliged to publish and use open data about the public services they deliver, their contracts should not prevent them from doing so on a voluntary basis.

Learning the lessons of Freedom of Information

- 15 A "right to data" is an important step in ensuring that the most relevant publically-held data is available to voluntary and community organisations.

For a right to data to work, lessons learned from Freedom of Information must be applied. Routes for applying for data must be clear and accessible, with clear guidance on the range of data collected by the public body. To maximise value, the procedure for requesting access to data and appealing decisions must be transparent and timely.

- 16 Responses to the "right to data" must adhere to open data principles outlined elsewhere, and there must be an emphasis on data opened up in this way being available to all, not just to the person or organisation who requested the data. A "right to data" request should be seen as a signal that the data is relevant and useful, and should be made available as a matter of course, rather than as a one-off request in the manner of Freedom of Information requests.
- 17 Implemented correctly, a right to data should be less adversarial than a Freedom of Information request. Requests to access data should not be automatically seen as a challenge to a public body, but instead a constructive part of a healthy working relationship.

Capacity and skills

- 18 NCVO believes that open data released by public bodies is a vital resource for voluntary and community organisations to help measure need in their service areas, to evaluate and improve their services, and to help campaign for change. However, these outcomes can only be achieved if voluntary organisations have the capacity and skills to be able to use data that government produces.
- 19 In part this can be helped by the way data is released – by using standard formats, including comprehensive metadata and explaining unusual terms used, and by keeping these consistent over time, the data becomes more accessible to those with little time or data skills. But voluntary organisations also need to be supported to be able to build up the skills needed to take advantage of open data.
- 20 Voluntary and community organisations may also need support in becoming "bridges" between the data and the public, as well as using it themselves. Voluntary and community organisations are well placed to help citizens access meaningful data that could make the difference to their lives, but may need technical help to be able to do this. The DataBridge project in Brighton has some very helpful recommendations in this area³.

³ <http://databridgeuk.wordpress.com/>

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This response has also been published as a blog on the NCVO website⁴.

⁴ <http://www.ncvo-vol.org.uk/networking-discussions/blogs/116/11/10/26/making-open-data-real-consultation-response>

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