

DCLG RESPONSE: 'MAKING OPEN DATA REAL' CONSULTATION

Cost Burden on Local Authorities

We would be happy to work-up a New Burdens Assessment (NBS) with you.

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General Comments

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b) We need to draw a line on confusing the regulatory framework e.g. putting amendments into a variety of different Acts.

c) We have been investigating the development of a map for all blue badge parking bays - but the stumbling block is the lack of consistent published data.

d) We would like to see more done to capture and showcase real-world examples making open data "real". We're learning a lot about approaches that work, with a general acceptance that it's OK to start small, and grow incrementally in line with user demand. We would be happy to feed in further info on how we approached the task of releasing the Index of Deprivation as 5-star, searchable linked data.

e) It would be good to know how this sits with other related consultations and activities. Am thinking specifically of the Growth Review, and its open-data strand - where there is a slightly sharper edge to delivering useful, valuable open data products for a specific purpose.

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h) To address the issue of data standardisation there is suggestion that such issues will be addressed by better IT systems from 2012 onwards (8.5.7, 8.7.5). I am not sure if that addresses the issue and believe that government has a key role in firstly setting out what the key data sets are they need to report on and introduce standardised classification, as they do for the Standard Chart of Accounts and Commodity reporting.

Comments on specific Para's

5.1 *Releasing all user feedback on services.* The consultation document does not mention public authorities right of redress, e.g. if user feedback is published that is libellous, incorrect or misleading, or the amount of time that may be needed to take corrective action.

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8. We already have a *board-level person* who does this - the SIRO.
There is already a sanctions framework - the ICO.

8.6.1 *All data that is not exempt to be published by default.* Determining if something is exempt or not can take considerable effort. The process would need to be repeated routinely for each item as the status of any data or information changes over time.

8.6.3 *ICO to mandate that a published dataset be made available in a given format.* The ICO may not have an appreciation for the effort involved, and in some cases data needs to be in particular formats to ensure hidden data is completely removed (e.g. the removal of 'track changes' data and metadata from Word.) Lack of definition of 'data' doesn't help!

8.6.6 *Legislating for time limit for internal reviews.* This should be acceptable, but there needs to be allowances for complex issues.

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8.8. *Publishing data of poor quality needs more consideration,* depending on the aspect that is 'poor'. If data is inaccurate, or not cleaned to remove personal data fully, it should not be published as it will be misleading at best and illegal at worst.

8.10 *Merging FOI publication schemes.* Under the Act these have to be published by each public authority. We would need to be clear that putting

them in a merged scheme met the terms of the Act, was acceptable to the ICO, and actually provided better information to the public.

Consultation Questions

8.13-15 questions

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5. Data accuracy is very important. Publishing inaccurate data can lead to loss of public confidence and to serious, unjustified reputational damage.