

OPEN DATA CONSULTATION QUESTIONS – Response by LB of Croydon

Glossary of key terms page 6

Questions for consultation:

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

The scope of definitions are pitched at the right level. We support the simplicity of these and think the use of plain language is important to make data accessible

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

We think it is important that the information accords with DPA principles so that personal data isn't being published and the Public Interest Tests ensure that there is a genuine public interest in the datasets being published. We think this is particularly important given the resource implications for local councils. For this reason we think it would be useful to include some sort of cost-effectiveness test to make sure that the datasets do not have disproportionate resource implications.

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?

Practically; yes. If there are significant resource implications (as above) but only under these circumstances.

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?

We support its application across the public sector with the normal safeguards in terms of personal or sensitive data.

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

Government could use the results of consultation and use of existing performance information to assess what information should be published as an open dataset and

establish a repository/observatory of information that all public bodies can channel their information through to enable comparison. Councils themselves can build on the work they are already doing particularly through social media and their websites to make key information available.

Section 8 - Policy Challenge questions page 25

Questions for consultation:

1. **An enhanced right to data:** how do we establish stronger rights for individuals, businesses and other actors to obtain, use and re-use data from public service providers?
2. **Setting transparency standards:** what would standards that support an enhanced right to data among public service providers look like?
3. **Corporate and personal responsibility:** how would public service providers be held to account for delivering Open Data through a clear governance and leadership framework at political, organisational and individual level?
4. **Meaningful Open Data:** how should we ensure collection and publication of the most useful data, through an approach that enables public service providers to understand the value of the data they hold and helps the public at large know what data is collected?
5. **Government sets the example:** in what ways could we make the internal workings of government and the public sector as open as possible?
6. **Innovation with Open Data:** to what extent is there a role for government to stimulate enterprise and market making in the use of Open Data?

Enhanced Right to data – Page 25

Questions for consultation:

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

We support the transparency agenda and believe a strong presumption in favour of publication would be helpful to ensure compliance.

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?

We would support this suggestion.

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

Broadly, yes. Organisations have a responsibility to ensure staff are aware of guidelines and any support that government could provide in this regard would be welcomed. i.e email alerts/central information portal. Simple guidelines that can be cascaded across organisations.

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?

By applying the tests ie. Cost effectiveness mentioned earlier in this response..

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

The suggestion made in the paper about procurement rules for ICT systems would go a long way towards this. Focus on getting it right now and moving forward rather than focus on making retrospective historic datasets more transparent is key.

Setting Open Data Set standards – page 28

Questions for consultation:

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

We support the creation of a register of those common standards and guidelines of how to achieve compliance..

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

Yes

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

We do not think this is necessary if the mechanisms mentioned above are applied,

Corporate and Personal responsibility – page 30

Questions for consultation:

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.

Mystery shopping or similar tools would be useful plus the highlighting of good practice along with monitoring progress.

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?

Local councils could have a Data Champion, preferably a chief officer. Councils should not breach data/privacy laws.

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

Yes this would be useful.

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

All sectors would benefit.

Meaningful Open Data page 31-32

Questions for consultation:

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

These should be more prescribed with a. Publication Scheme.

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

Through consultation and research, and careful review of what is subsequently requested or accessed

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

Expenditure, income and performance would be the main areas of interest in government data. All information about the area itself and the range of services available and user profiles.

4. What data is collected „unnecessarily“? How should these datasets be identified? Should collection be stopped?

It should be possible to ascertain interest by level of utilisation for individual datasets, enabling refinement over time

5. 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?

Data should be accurate, final versions that can be easily disseminated and interpreted by the public. Inaccurate or unverified data should not normally be published except under exceptional circumstances.

Government sets the example page 33-34

Questions for consultation:

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?

A central portal would be of use but public organisations would also put information on their own sites,

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

The aim should be to enhance public and business engagement, increase sense of place and also enhance public policy decisions at a local, regional and national level.

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

The aims listed above in question 2.

Innovation with open data page 36

Question for consultation:

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.

I do not think that government (local or national) needs to stimulate use of open data other than by providing it in an accessible, timely fashion.