

Making Open Data Real: A Public Consultation

Transport for Greater Manchester's Response

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

A significant behavioural and cultural change is required in the public sector for this to happen. Given the significant levels of change required, the Government should aim to make Open Data a mandatory requirement for the public sector. Requirements should be formalised and detailed within a new 'Open Data Code of Practice'. The suggested Code of Practice should detail expectations and requirements of the public sector in terms of Open Data.

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?

This would seem to fit logically into the ICO's remit. The ICO represents an independent and impartial body that is ideally located to perform this function. The ICO should be provided with sufficient resources to perform these additional functions.

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

Yes but reinforced and made explicit within the proposed Code of Practice.

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?

At a time when the public sector is making cuts and having their budgets reduced, the creation of more work and additional responsibilities will add further strain on current resources. As long as the Government recognises this and seeks to increase budgets accordingly, this should be manageable. Without any additional resources being provided, embedding an Open Data culture would be extremely difficult to achieve across the public sector in a consistent manner.

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

Procurement rules should be amended to ensure that Open Data standards are included within any new ICT contracts and specifications. This requirement alongside the necessary standards should be detailed within the proposed Code of Practice.

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

Develop an agreed set of Open Data standards/principles and make them a mandatory requirement within the proposed Code of Practice.

The Government should also look to remove restrictions that inhibit the public sector's ability to release data. One such barrier that many public sector organisations have encountered is the licensing restrictions imposed by the Ordnance Survey (OS).

A large proportion of key datasets are derived from OS mapping, yet these cannot be released under the standard Open Government Licence. Publishing organisations have to audit and analyse the source(s) of each dataset, determine which one or more of the OS OpenData, OS Free-to-Use Data, OS Derived Data and exempt dataset licences applies, and to re-capture data where the OS licence would not otherwise permit its release. The existence of these multiple 'non-standard' licences acts as a barrier, through the time required for organisations and users to audit

their implications, and through the prohibition of the release of certain types of dataset.

The Government can play a role in loosening these restrictions, thereby enabling more geographical datasets to be released and reducing the cost of doing so. Significant progress has been made in recent years, but more needs to be done otherwise many datasets may never be released.

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

The Open Data Code of Practice should specify a consistent standard for facilitating, collecting and, if appropriate, acting on user feedback.

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

Intermediaries will unnecessarily add another layer of complexity and bureaucracy to the process. The establishment of intermediaries would absorb much needed resources, which would be better used by public sector bodies to help them with open data activities. The Government should take responsibility rather than delegating to an intermediary.

9 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.

Introduce corporate responsibility at Board level to ensure that the 'right to data' agenda is represented at a senior level and is being met. Detailed guidance on privacy and security considerations should be presented through the suggested Code of Practice with the threat of sanctions for non-compliance.

- 10 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**

Board level responsibility for information governance should be established that includes both Open Data and Privacy accountabilities.

- 11 Would we need to have a sanctions framework to enforce a right to data?**

A sanctions framework is probably required to focus the minds of the public sector and to stimulate the required levels of action.

A range of sanctions should be established ranging from league tables, naming and shaming through to financial penalties.

- 12 What other sectors would benefit from having a dedicated Sector Transparency Board?**

The transport sector would benefit from having a transparency board that encourages and supports Open Data within the sector.

Transport data represents a particularly useful and valuable data resource for creating better informed commuters and other travellers, and encouraging the use of public transport, and would benefit from having such a Board.

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

Public sector bodies should be encouraged to develop and publish common, consistent and transparent data inventories outlining what datasets are held, and whether they are open or not, using agreed standards. These inventories could then be used to inform the public on data availability.

The use of data audits should be recommended as a means of informing the development of data inventories.

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

Most public bodies have a number of statutory datasets that they are obliged to collect. These mandatory datasets should represent 'priority' datasets for inclusion in an inventory.

After the inclusion of the statutory datasets within the inventory, each public sector organisation should then seek to make a local decision as to what other datasets to include, based on their perceived usefulness and availability. To aid this process, public sector bodies should look at several factors including; what members of the public most frequently request (look at FoI requests), what data can be released with little or no resources required and what are the big issues of the day. Resources can then be focused on listing, and where appropriate releasing these datasets.

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

All parts of government should be accountable and transparent therefore be expected to collect and publish open data as a matter of routine.

16 What data is collected 'unnecessarily'? How should these datasets be identified? Should collection be stopped?

The suggested data audits, followed by output analysis should help organisations to identify which data offers little/no value and is therefore being unnecessarily collected.

17 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?

Quality can be subjective but tends to have the following attributes; relevance, accuracy, detail / precision, timeliness, accessibility, interpretability and coherence.

The quality of data can be enhanced through the release of metadata. The use and release of metadata should be encouraged with every dataset that is released.

Given the levels of resources required to improve the quality of data, it would seem to make sense that the public sector should be encouraged to publish data of a lower quality in preference to holding it back, whilst seeking over time to improve the quality.

The release of low quality data can in the long-run, help to improve its quality. Releasing data makes it available to a wider audience who should be encouraged to identify any anomalies, communicate these back to the data publisher who can then work on improving the data before being re-released.

18 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?

It is acceptable to have multiple portals, so long as good quality metadata is created, and can be collated centrally, e.g. for data discovery via data.gov.uk.

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

See reply to question 14.

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

The data inventories should cover a broader set of data, whereas the data which is published should focus in detail on those topics where interest is greatest. The existence of the inventories will assist in identifying where the interest lies.

21 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?

The Government can play an important role in stimulating innovation in the use of Open Data. The Government should seek to work more closely with academic and private sectors to ensure that the skills and knowledge required to optimise the use of data are in place. This will ensure that products and services are created that are useful to the community.

Rewarding innovation based on using Open Data should also be considered maybe through an award scheme. Grants should also be made available to support innovation and development.