



# InterPARES Trust Project

## Research Report

Title:	The Role of the Records Manager in an Open Government Environment in the UK
Team & Study:	European Team EU 03
Status:	Final Report (restricted)
Version:	1.0
Date submitted:	November 5, 2014
Last reviewed:	November 5, 2014
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Research domain:	Access Domain
URL:	

## Document Control

Version history			
Version	Date	By	Version notes
1.0	20141104	E. Shepherd	
1.0	20141105	C. Rogers	Formatting

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# **The role of the records manager in an open government environment in the UK: Case Study 2014**

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## **Introduction**

The open government data and access to public sector information environment in the UK and Europe is being transformed: this raises questions about the roles and responsibilities of the professionals who might be engaged in delivering services to citizens. Recordkeeping policy on access and the legislative and regulatory frameworks need to be clarified and the role of the recordkeeper needs to be examined. Whereas the UK's Freedom of Information legislation 2000 was accompanied by official codes of practice aimed at recordkeepers and others regarding how to respond to requests for information (FOIA section 45) and the significance of effective records management in complying with freedom of information requirements in public bodies, there has been no such advice or guidance for those responsible for managing and making public sector information available in this new climate of pro-active release. This study seeks to investigate the recordkeeping requirements for operating effective and trusted proactive release within a UK context, as a contribution to comparative work looking at the recordkeeping role in Europe and beyond.

This project examines the role of the records manager in an open government environment in the UK, using a case study. It considers what the function of a records manager in the UK public sector is like in 2014, and what it ought to be in future, in the new context of open government data and the proactive release of public sector information. What is the

legislative and regulatory framework, what guidance literature or frameworks are there to guide recordkeepers in this role and in ensuring that the information provided is authentic, reliable, trustworthy and not in breach of any sensitivity concerns?

The research was carried out over the period, April to August 2014 by researcher and Masters student, Jessica Page, guided by Co-Is, Dr Andrew Flinn and Professor Elizabeth Shepherd, all at UCL, Department of Information Studies. The research project complies with UCL research ethics requirements and is registered for Data Protection, reference Z6364106/2014/07/15. The research was supported by the Information and Records Management Society, Public Sector Group (IRMS, PSG), which invited the researchers to speak to a meeting on 3 April 2014, helped to circulate a survey to the PSG membership and hosted blog posts about the research project. Data was collected using two main methods: a short survey (see Appendix 2) was circulated by email to members of the IRMS PSG in late June 2014 (135 members). Although only 7 responses were received, this provided some baseline data to help put the case study into a wider context (see Appendix 3 for survey results and analysis). The main case study carried out in July looked at the ways in which open government data are managed within one public authority (a county council) to explore the reality of practice, including what and where the different responsibilities lie.

Interviews concerning open government data were conducted on 11<sup>th</sup> and 15<sup>th</sup> July 2014 at a UK County Council. See Appendix 4 for the interview schedule, and Appendix 6 for detailed summaries of the interviews. The results and analysis of these interviews

follows, set into the context of the literature and IRMS PSG survey responses. The case study results will be structured in the following sections, according to the interview schedule: definitions (s.1.2), guidance and regulations (s.1.3), and the implementation and management of open government data (s.1.4). An explanation of interviewees' roles and responsibilities will be provided first (s.1.1) to give insight into their understanding and interaction with open government data.

### **1.1 Roles and Responsibilities**

Please refer to Appendix 7 for a structure of the Information Resilience and Transparency Team.

The Information Access Officer, the Records Manager and the Information Governance Specialist all work for the Information Resilience and Transparency Team. The team's primary objective is to facilitate and ensure the County Council's compliance with Information Governance legislation.<sup>1</sup> The Information Access Officer is the first point of contact for members of the public, who are enquiring about access to information. The Information Access Officer ensures the County Council complies with the Data Protection Act 1998, the FOI Act 2000, the Environmental Information Regulations 2004 and the Re-use of Public Sector Information Regulations 2005.<sup>2</sup> The Records Manager ensures recordkeeping systems are compliant with relevant legislation and manages the retention schedules and information asset register.<sup>3</sup> The Information Governance Specialist is responsible for the County Council's Data Protection registration and notification, FOI Publication Scheme and Asset Register. The Information Governance Specialist acts as a liaison with the ICO and provides assistance, guidance and training to

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<sup>1</sup> County Council, *Data protection policy*, (2012), p.2.

<sup>2</sup> County Council, *Information access officer job description*, (2014).

<sup>3</sup> Interview 3, *Council Records Manager*, 11 July 2014.

members of staff on all aspects of Information Governance, such as information sharing and security. The team also maintains the Information Security Incident Log and investigates alleged Data Protection breaches.<sup>4</sup>

The Business Intelligence Officer is from the Business Intelligence Team. The Information Resilience and Transparency Team Leader, the Records Manager and the Business Intelligence Officer are all part of the County Council's Open Data Working Group. The Business Intelligence Officer leads specific projects regarding the Authority's approach to open data. The Business Intelligence Team is responsible for developing specialist knowledge and expertise relating to the national and local policy arena of open data and data exploitation.<sup>5</sup>

## 1.2 Definitions

The interviews did not convey a comprehensive meaning of open government data, but common elements were articulated. The features of open government data mentioned, matched those referred to in the literature and the surveys. The County Council's website defines open government data as 'non-personal datasets we publish on our website available to everyone in a format that can be reused.'<sup>6</sup> Similar words were used in the interviews and the surveys, including 'freely available' and 're-use'. Other features, which were highlighted by the Business Intelligence Officer and the Records Manager,

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<sup>4</sup> Information Governance Specialist, *Email from information governance specialist regarding roles and responsibilities*, (2014).

<sup>5</sup> Business Intelligence Officer, *Email from business intelligence officer regarding role and responsibilities*, (2014).

<sup>6</sup> Council Open Data Website, Accessed 19 July 2014.

included data which is part of the operations of the County Council, data in a ‘machine readable format’ and data, which is used by the general public.<sup>7</sup>

The types of open government data referred to in the interviews were also similar to data mentioned in the internal Records Management and Open Data documents. The types of data referred to, included financial data, demographic data and data concerning highways. These types of data were based on FOI requests received and departments publishing open government data.<sup>8</sup> The Strategic Priority Statement 2014/2015 also provides examples of Census data and data regarding the economy, which is collected by the County Council.<sup>9</sup> On the website, available data includes Council data, financial data, education data and leisure and community data.<sup>10</sup> A document produced by the Records Manager concerning retention schedules indicates the broad range of records held by local government, which will include raw data. The retention schedule refers to ‘Insurance Policies, Education Properties, Public Transport records, Waste Management Records-Recycling’.<sup>11</sup>

A clear, comprehensive definition of open government data may develop when the Open Data Policy is circulated amongst all members of staff. The Open Data Policy for the County Council is currently in the process of being developed. A clear definition of open

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<sup>7</sup> Interview 2, *Council Business Intelligence Officer* and interview 3, 11 July 2014.

<sup>8</sup> Interview 1, *Council Information Access Officer*, interview 2, interview 3 and interview 4, *Council Information Governance Specialist*, 11 and 15 July 2014.

<sup>9</sup> County Council, Strategic and corporate services directorate, *Strategic priority statement 2014/2015*, (2014), p.5.

<sup>10</sup> Council website concerning data and information, Accessed 16 July 2014.

<sup>11</sup> County Council, *Retention schedule*, (2014)



government data helps to ‘avoid the risks of creating incompatibility between projects.’<sup>12</sup>

Overall, common features associated with open government data are gradually becoming established within the County Council, but a distinct definition is yet to be clarified.

### 1.3 Guidance and Regulations

When asked about external guidance and regulations, the Business Intelligence Officer, the Records Manager and the Information Governance Specialist all mentioned the Transparency Code. The Records Manager and the Information Governance Specialist found the Code useful for determining which data needed to be published, as did one of the survey respondents.<sup>13</sup> Two of the six surveys mentioned the Transparency Code in relation to external guidance and regulations.<sup>14</sup> One of the survey respondents found the ‘Frequently asked questions’ part of the Transparency code useful for guidance on open government data.<sup>15</sup>

However, problems with the Code were also identified, in terms of reaching the suggested standard and assuming established electronic systems. The County Council is still predominately based around a paper-record system, according to the Records Manager.<sup>16</sup> In order for a Records Manager to participate and help meet the expected standards they will therefore need to develop the necessary technical and digital expertise. However, finding the time to gain these digital skills may be challenging for the Council’s Records Manager, who is used to a paper environment and already has a

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<sup>12</sup> Laura James, Open knowledge foundation, *Defining open data* (2013), at <<http://blog.okfn.org/2013/10/03/defining-open-data/>>. Accessed 25 July 2014.

<sup>13</sup> Interview 3 and interview 4.

<sup>14</sup> Surveys 2 and 4, (2014).

<sup>15</sup> Survey 2, (2014).

<sup>16</sup> Interview 3.

number of responsibilities. The County Council are attempting to meet the standards within the Transparency Code with regards to the five star scheme, since the draft Open Data Policy states that ‘the amount of data publications that meet level 3 of the 5 Star Scheme will be monitored, as will the amount of data that fails to meet the level 3 standard.’<sup>17</sup>

Other criticisms concerning the Transparency Code included the emphasis on publishing as much data as possible, rather than considering which data will be utilised. The Code encourages publishing financial data, but the Business Intelligence Officer questioned whether members of the public would use this data.<sup>18</sup> Views over the Transparency Code reveal a tension between central government, encouraging the publication of as much data as possible and local government wanting to save resources by selecting and determining which data members of the public will use.

Interviewees were not aware of any guidance directly related to open government data. The lack of direct guidance was also conveyed in the surveys, with fifty per cent of respondents conveying no knowledge of any guidance relating to open government data.<sup>19</sup> The Business Intelligence Officer was also not aware of any further documentation or guidance from the Open Data White Paper and felt that the documentation concerning open government data focused on the needs and requirements of central government, rather than local government.<sup>20</sup>

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<sup>17</sup> County Council, *Draft Open Data Policy*, (2014), p.5.

<sup>18</sup> Interview 2.

<sup>19</sup> Surveys 3, 5 and 6, (2014).

<sup>20</sup> Interview 2.

The Records Manager felt FOI, Data Protection and Records Management guidance were suitable for an open government data environment.<sup>21</sup> Other local government authorities are evidently also referring to this guidance, since three of the surveys also mentioned the Data Protection Act, FOI Act and Protection of Freedoms Act, as well as similar related internal policies.<sup>22</sup> Data Protection and FOI legislation and guidance are associated with an open government data environment, in relation to protecting personal data and requesting datasets. However, this legislation and guidance does not address all the challenges, expertise and skills required to manage an open government data environment.

Open government data is affecting the responsibilities of a number of teams within local government. For example, one of the survey respondents highlighted that open government data was not under the official responsibility of one team but the responsibility of Information Management, Information Technology, Data and Statistics and Communications.<sup>23</sup> Local government authorities are therefore referring to a variety of legislation, regulations and guidance to fulfill the need for open government data guidance and responsibilities are being spread across departments. The Records Manager suggested direct International Standards for open government data would restrict the environment from developing.<sup>24</sup> However, the Records Manager proceeded to acknowledge that International Standards in relation to Records Management and the

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<sup>21</sup> Interview 3.

<sup>22</sup> Surveys 1,2 and 4, (2014).

<sup>23</sup> Survey 5, (2014).

<sup>24</sup> Interview 3.

improvement of reliable records would improve the accuracy of open government data as a form of output.<sup>25</sup> It is arguably too soon for the standardisation of open government data, due to the emerging and developing environment, but standards could eventually ensure the effective exchange and use of reliable data.

When discussing what guidance would be useful, the Business Intelligence Officer would like guidance to include advice on the practicalities of linking data together and the publication of data, since the Officer felt data became valuable when placed in a larger context.<sup>26</sup> The Information Access Officer felt guidance was needed to provide a clear definition of datasets, examples and case studies to set a precedent of best practice for publishing high quality, accurate and useable data.<sup>27</sup> The Information Access Officer believed this type of guidance as well as a module for open government data as part of training for staff would help to raise awareness of open government data responsibilities and aid consistency across County Councils.<sup>28</sup> The need for training to deliver effective open government data services and the publication of ‘examples of organisations, teams and individuals’ working to best practice were also encouraged in a report by Chris Yiu in 2013.<sup>29</sup> Training of staff and the recognition of good practice will help local governments to understand the importance of open government data and encourage future publications, thus helping open government data initiatives to impact and benefit society.

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<sup>25</sup> Interview 3.

<sup>26</sup> Interview 2.

<sup>27</sup> Interview 1.

<sup>28</sup> Interview 1.

<sup>29</sup> Chris Yiu, Policy Exchange, *A right to data, fulfilling the promise of open public data in the UK* (2012), at <<http://www.policyexchange.org.uk/images/publications/a%20right%20to%20data%20-%20mar%2012.pdf>>. Accessed 1 August 2014, p.14,15.

Guidance and regulations are required to ensure the accuracy and monitoring of published data. This issue was discussed with the Information Access Officer who suggested that monetary fines for not complying with legislation and providing inaccurate data, similar to those in the Data Protection and FOI Act would not necessarily be effective, since fines would impact on the quality and low resources available for local government services.<sup>30</sup> However, members of staff at the County Council are aware, through the Data Protection Policy, of the consequences of breaching the Data Protection Act with fines up to £500,000 from the ICO, thus enhancing the importance of Information Governance and compliance.<sup>31</sup> The Information Access Officer alternatively suggested that a monitoring list or audit of authorities in an open government data environment would encourage County Councils to ensure the publication of accurate data, to maintain the Council's reputation.<sup>32</sup> Performance measures and audits of local government, concerning open government data activities in terms of the level of internal support, availability of technical tools and community satisfaction could also encourage greater investment and future publication of accurate data.<sup>33</sup> The monitoring of open government data is essential, since the effective re-use of data is reliant on accurate and reliable data being provided. Accuracy and reliability are two values, which are embedded within the Council's Records Management guidance.

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<sup>30</sup> Interview 1.

<sup>31</sup> County Council, *Data protection policy*, (2012), p.2.

<sup>32</sup> Interview 1.

<sup>33</sup> Chris Yiu, Policy Exchange, *A right to data, fulfilling the promise of open public data in the UK* (2012), at <<http://www.policyexchange.org.uk/images/publications/a%20right%20to%20data%20-%20mar%2012.pdf>>. Accessed 1 August 2014, p.15, 21.

Both the Records Manager and the Information Access Officer emphasised the importance of establishing Records Management guidance and policies for ensuring accurate data and records. The Records Manager, in particular stressed the importance of Records Management policies and guidance for supporting the creation of reliable data and records.<sup>34</sup> However, Records Management documentation and responsibilities at the County Council do not currently extend to datasets. The relationship between well established Records Management and reliable open government data was also portrayed in the survey responses. One of the survey respondents argued ‘the first step is to focus on the general improvement of the whole information and records management corporate framework, whose quality is essential for the appropriate identification, treatment and access to open government data.’<sup>35</sup> The role and contributions of Records Management therefore becomes vital in an open government data environment.

The Data Protection Policy for the County Council includes principles, which are applicable to an open government data environment and encourage accurate and reliable data. These principles include retaining data ‘fairly and lawfully’, keeping data up to date and current and using appropriate measures to protect ‘against loss or destruction’.<sup>36</sup> Throughout the Information Management Manual for the County Council accuracy, authenticity, reliability and utility are strongly emphasised. The Information Management Manual explains accurate records are needed to ‘support the business function(s)’ and for liability and accountability purposes.<sup>37</sup> The Manual also addresses the need to ensure the

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<sup>34</sup> Interview 3.

<sup>35</sup> Survey 1, (2014).

<sup>36</sup> County Council, *Data protection policy*, (2012), p.3.

<sup>37</sup> County Council, *Information management manual*, (2013), p.5,6.

storage of electronic records so ‘records will remain accessible, authentic, reliable and useable.’<sup>38</sup> There is also advice within the manual to construct an audit trail for the destruction and alteration of records for accountability purposes and justification of decision-making processes.<sup>39</sup>

The Records Management Policy for the County Council also supports the Information Management Manual, in terms of encouraging the Council to create systems, which ensure ‘data, information and records which are accurate, reliable and accessible.’<sup>40</sup> In the Records Management Policy, Records Management is described as being ‘at the core of every service provided’ by the County Council.<sup>41</sup> However, this is a Records Management viewpoint, it is difficult to determine whether this opinion has Executive support within the Council and is also accepted by those responsible for creating datasets. A useful future research topic for open government data would therefore involve discussions with Executive members and creators of published data concerning their viewpoints over the relevance and importance of Records Management in an open government data environment.

The internal Action Plan for Records Management Policy - The National Archives Section 46 Workbook, which is updated by the Records Manager, conveys how Records Management has progressed within the Council. According to this document, paper Records Management is well established but there is a need for electronic records to be

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<sup>38</sup> County Council, *Information management manual*, (2013), p.11,28.

<sup>39</sup> County Council, *Information management manual*, (2013), p.40.

<sup>40</sup> County Council, *Records management policy*, (2012), p.2,7

<sup>41</sup> County Council, *Records management policy*, (2012), p.2.

‘registered, classified or indexed’.<sup>42</sup> If Records Management was to progress to the management of electronic records as well, then the relevance of Records Management in an open government data environment may become more obvious. However, there is also a need for Records Management principles and policies to be well established, to encourage the creation of authentic and reliable records, based on accurate data.

The comments within the interviews conveyed the strong need for established Records Management policies for accurate and reliable data. However, despite the guidance for policies concerning Records Management, FOI and Data Protection which are available via an intranet and mandatory for all members of staff at the County Council to read, according to the Information Governance Specialist there is currently no way of checking that members of staff have read the guidance and policies.<sup>43</sup> Therefore, to ensure Records Management and Information Governance is being fully acknowledged, for reliable open government data, the reading of this guidance needs to be audited, to encourage effective implementation. Open government data training could be added to the e-learning modules on the intranet to raise awareness of the uses of data and provide a clarified definition.

The Data Protection policy and the FOI policy outline how the legislation affects the decisions of all staff in terms of making ‘an informed judgment on when and when not to share information’ and their responsibilities to respond to FOI requests within twenty working days.<sup>44</sup> Both the Information Access Officer and the Records Manager

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<sup>42</sup> County Council, *Action plan for records management policy - the national archives section 46 workbook*, 18/06/2014, (2014), p.8.

<sup>43</sup> Interview 4.

<sup>44</sup> County Council, *Data Protection Policy*, (2012), p.2 and *Freedom of Information Policy*, (2012), p.3.



advocated for the publication of guidance, policies and legislation, since they help to promote the importance and knowledge of information governance and management throughout the Council.<sup>45</sup> One could therefore conclude that a similar framework of guidance, policies and legislation related to the management of open government data could raise awareness of the responsibilities and need for Records Managers in an open government data environment.

The Information Governance Specialist supported the need for guidance in an open government data environment due to the challenges and difficulties experienced when working with the Finance department on invoice publication three years ago.<sup>46</sup> The Information Governance Specialist suggested constructing a forum to discuss challenges with other councils, since they found discussion forums useful when addressing issues arising from the FOI Act or the Data Protection Act.<sup>47</sup> There were indications in two of the survey responses that this sort of informal support was beginning to develop with regards to open government data. One of the survey respondents mentioned an informal email list of information governance officers across the country.<sup>48</sup> Another survey respondent was not aware of any external guidance but sometimes contacted the Department for Education for help, although it was not explained why this particular Department was contacted.<sup>49</sup> Greater knowledge of these forums and informal guidance would perhaps lessen the challenges of open government data and raise awareness of its value.

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<sup>45</sup> Interview 1 and interview 3.

<sup>46</sup> Interview 4.

<sup>47</sup> Interview 4.

<sup>48</sup> Survey 2, (2014).

<sup>49</sup> Survey 5, (2014).

The promotion of information governance within the Authority through open government data guidance and regulations may lead to future enquiries for the Information Governance Specialists from departments across the Council concerning advice over which data to publish. Both the Information Access Officer and the Information Governance Specialist perceived further enquiries of which data to publish as a future impact on their roles in an open government data environment.<sup>50</sup> This will therefore add to the workload of the Information Resilience and Transparency Team. In one of the surveys, the Information Governance Team provides advice on standards and web pages with regards to publishing open government data.<sup>51</sup> The role of providing additional advice may be one of the impacts on the role of Information Governance Specialists or Records Managers. However, this is dependent on the Records Management system being decentralised and the responsibility of individual departments rather than the centralised obligation of the Records Manager. The role of the Records Manager in a decentralised Records Management system will perhaps therefore provide advice, publish guidance and audit the publication of data in an open government data environment.

The County Council draft Open Data Policy ‘will work alongside the FOI Act, which provides a right to information, by providing for the accessibility of public data and its re-use.’<sup>52</sup> However, the Information Access Officer who manages FOI requests is not involved in the development of policies surrounding open government data, as her role is more junior. The Officer felt open government data was more of a responsibility of the

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<sup>50</sup> Interview 1 and interview 4.

<sup>51</sup> Survey 2, (2014).

<sup>52</sup> County Council, *Draft Open Data Policy*, (2014), p.3.

senior members of staff, therefore portraying how responsibilities have yet to filter down to the lower levels of staff.<sup>53</sup> This also reflects how FOI and the handling of information have become routine, whereas open government data is new to local government and dealing with data is perceived as risky and therefore requires senior staff involvement. One of the survey respondents also acknowledged the need for senior members of staff involvement and support for open government data initiatives.<sup>54</sup> The responsibility of open government data activities given to senior members of staff, may affect the types of data chosen to be published and may not reflect the full extent of operations, therefore affecting the level of transparency.

The Information Access Officer, the Records Manager and the Information Governance Specialist all acknowledged the use of FOI requests as an indication of which data people are interested in and would therefore be worth publishing as open government data.<sup>55</sup> For example many requests concern potholes in the area.<sup>56</sup> Minutes from a meeting on 12 September 2012 convey how the County Council's Open Data Working Group are intending to use FOI requests as well as page views and other statistics to determine what types of data are gaining interest from the general public.<sup>57</sup> One of the survey respondents also supported the use of FOI requests as an indication for suitable data to publish.<sup>58</sup>

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<sup>53</sup> Interview 1.

<sup>54</sup> Survey 6, (2014).

<sup>55</sup> Interview 1, 3 and 4.

<sup>56</sup> Interview 1, interview 3 and interview 4.

<sup>57</sup> Open Data Working Group, *Minutes of Open Data meeting 12 September 2012*, (2012), p.2.

<sup>58</sup> Survey 2, (2014).

However, the Information Access Officer, the Records Manager and the Information Governance Specialist argued FOI requests are often specific to the individual needs.<sup>59</sup> The Records Manager identified a benefit of this, since specific requests are sometimes less time consuming than checking and publishing large datasets.<sup>60</sup> The specific nature of FOI requests is supported by other case studies, including Ben Worthy's study of a small sample of three hundred FOI requests. Worthy 'found 55 per cent were specific, with a focus on a single issue or event or location.'<sup>61</sup> Discussions surrounding the use of FOI requests therefore question the impacts of wide-ranging open government data and who will be using the data.

The Records Manager and the Information Governance Specialist were doubtful of the general public using open government data, but instead thought the press and commercial companies would exploit local government data.<sup>62</sup> Both interviewees felt the general public would not take the time to search and explore the data in depth; they would instead use an FOI request to find what they required.<sup>63</sup> This viewpoint is also reflected in other findings, where 'many officials felt despite constant attempts to promote interest, the local electorate are either uninterested or perplexed by local government.'<sup>64</sup> Potential users of open government data are therefore the press or pressure groups interpreting the data on behalf of local citizens. However, the Records Manager suggested there was

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<sup>59</sup> Interview 1, interview 3 and interview 4.

<sup>60</sup> Interview 3.

<sup>61</sup> Worthy, "Some are more open than others", p.408.

<sup>62</sup> Interview 3 and interview 4.

<sup>63</sup> Interview 3 and interview 4.

<sup>64</sup> B. Worthy, J. Amos, R. Hazell, G. Bourke, London: Constitution Unit, *Town hall transparency? The impact of freedom of information on local government in England* (2011), at <<http://www.ucl.ac.uk/constitution-unit/publications/tabs/unit-publications/155.pdf>>. Accessed 13 June 2014. p.18.

interest in crime and school data, for decisions over which schools to send their children to and where to live.<sup>65</sup> The Business Intelligence Officer also suggested there was a need for greater public interest in open government data and perhaps a way of achieving this was with the publication of success stories and the encouragement of more innovative ideas.<sup>66</sup>

The publication of open government data will not replace FOI requests but both initiatives complement and impact one another. In 2013 the ‘Information Resilience and Transparency Team managed 2010 Freedom of Information Requests’ and they expect this to rise with a higher number of requests in 2014.<sup>67</sup> The Information Governance Specialist suggested that FOI requests were rising due to stories in the press using the FOI Act and greater awareness amongst the public of their rights to access information.<sup>68</sup> Open government data initiatives ‘require political will and resources and depends, as with Freedom of Information, very much on what use is made of it.’<sup>69</sup> The publication of case studies and success stories using open government data could thus lead to greater interest and awareness.

Overall, the interviews conveyed how established Records Management policies and guidance in local government is expected to encourage reliable open government data.

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<sup>65</sup> Interview 3.

<sup>66</sup> Interview 2.

<sup>67</sup> County Council, Strategic and corporate services directorate, *Strategic priority statement 2014/2015*, (2014), p.7.

<sup>68</sup> Interview 4.

<sup>69</sup> B. Worthy, J. Amos, R. Hazell, G. Bourke, London: Constitution Unit, *Town hall transparency? The impact of freedom of information on local government in England* (2011), at <<http://www.ucl.ac.uk/constitution-unit/publications/tabs/unit-publications/155.pdf>>. Accessed 13 June 2014, p.28.

This therefore portrays the vital need for a relationship between Records Management, Information Governance, Data Protection, FOI and open government data. Currently, it is difficult to determine the impacts of open government data. FOI requests and open government data may work together to an extent, but they serve different purposes from specific individual needs to broader requirements demanding large datasets. However, ensuring data is easy to find and locate may stop people forming an FOI request to meet their research requirements. The ease of location and retrieval of open government data will require some form of data management, recordkeeping skills and expertise.

#### **1.4 Implementation**

The discussions concerning the publication and management of open government data examined the roles and responsibilities of the Open Data Working Group, publishing and managing open government data and the challenges of open government data.

The Open Data Working Group is part of the Business Intelligence Team. The group's responsibilities include: identifying standards, principles and protocols of open data, developing a transparency strategy, determining the processes of opening data and data quality standards as well as encouraging the use of open government data.<sup>70</sup> Members of staff who are part of the Open Data Working Group are from the following areas: Records Management, Information Governance, FOI and Data Protection, Customer Engagement, Contact Centre, Performance Management, Digital Services (web), Business intelligence and Partnership working (internal and external). These members of the group can also feed into other groups with open government data updates, including Social, Health and Wellbeing; Growth, Environment and Transport; Education and

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<sup>70</sup> Open Data Working Group, *Terms of Reference*, (2014), p.2.

Young People's Services and Strategic and Corporate Support, thus expanding the awareness of open government data.<sup>71</sup> The Business Intelligence Officer keeps members of the group up to date with developments via email and they have had three meetings so far.<sup>72</sup> The establishment of a working group, dedicated to open government data developments, creates a promising foundation for the management of open government data.

The Records Manager is a member of the Open Data Working Group. The Records Manager is responsible for ensuring personal data is not published and assisting with the location and risk assessment of publishing data with the information asset register.<sup>73</sup> The information asset register acts as a form of inventory, linking physical records with the internal system.<sup>74</sup> The information asset register can help with searching and locating data for open government data initiatives. If the information asset register was standardised across local government the examination of open government data across numerous councils would be easier, thus enhancing the sources available for members of the public.<sup>75</sup> The Records Manager is responsible for guaranteeing protective marking of records; this helps to establish which data cannot be published because it is confidential or contains personal data. A clear definition of personal information is provided in the Data Protection Policy for the County Council, it is defined as 'any information that

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<sup>71</sup> Business Intelligence Officer, *Email from business intelligence officer regarding the Open Data Working Group*, (2014).

<sup>72</sup> Interview 2.

<sup>73</sup> Interview 2.

<sup>74</sup> Interview 3.

<sup>75</sup> Shakespeare Review, *An independent review of public sector information* (2013), at <[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/198752/13-744-shakespeare-review-of-public-sector-information.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/198752/13-744-shakespeare-review-of-public-sector-information.pdf)>. Accessed 1 August 2014, p.50.

relates to a living individual who can be identified from the information.<sup>76</sup> The County Council is therefore aware of the relationship between open government data and information governance in order to comply with the Data Protection Act. The Records Manager however suggested that a lot of data created by the Council contains personal data and therefore cannot be published.<sup>77</sup> The restrictions on publishing data highlight tensions between local government becoming more transparent and the need to protect the privacy of individuals.

The Records Manager perceived risk management and data security as their main priority in an open government data environment, once the data is published it becomes the concern of the Corporate Communications department.<sup>78</sup> Corporate Communications agree with the department publishing the data, the retention and future access of the data.<sup>79</sup> The Records Manager's role of this County Council is therefore a protective role of the personal data held by the local authority. The 2011 Transparency Code also stresses the need for local government to 'use a risk management approach with strong internal control arrangements to reduce the risk of any payment fraud as a result of publishing public data.'<sup>80</sup> The main responsibilities and role of the Records Manager in an open government data environment is therefore not maximizing data reliability but to ensure personal data is protected.

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<sup>76</sup> County Council, *Data protection policy*, (2012), p.2.

<sup>77</sup> Interview 3.

<sup>78</sup> Interview 3.

<sup>79</sup> Interview 3.

<sup>80</sup> Department for Communities and Local Government, *The code of recommended practice for local authorities on data transparency* (2011), at

<[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/5967/1997468.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/5967/1997468.pdf)>.

Accessed 2 July 2014, p.7.



The Information Governance Specialist played a similar role when working with the Finance department at the County Council on the publication of invoices. The Information Governance Specialist was ensuring personal data in the invoices was not published.<sup>81</sup> The Information Governance Specialist has not received any further updates or work from the Finance department since the publication of invoices.<sup>82</sup> With regards to the protective measures of securing personal data, the Information Governance Specialist was aware of data redaction and the addition of annotations to notify the user of amendments.<sup>83</sup> Annotations help the user to fully understand the presented data. The redaction of data is time consuming according to the Information Governance Specialist and therefore may discourage County Councils from publishing government data.<sup>84</sup>

The role of a Records Manager in an open government data environment in the case study is therefore centered on personal data security, ensuring compliance to legislation and being involved in the early decision making stages of publishing data. The data security role is also evident in other County Council's, since one of the survey respondents explained that the Information Governance team and FOI team were responsible for ensuring the correct management of data, determining which data can be safely released to the public.<sup>85</sup> Privacy concerns have grown due to the increasing 'use and misuse of technology' leading to 'a declining sense of trust around use of personal

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<sup>81</sup> Interview 4.

<sup>82</sup> Interview 4.

<sup>83</sup> Interview 4.

<sup>84</sup> Interview 4.

<sup>85</sup> Survey 1, (2014).

data.<sup>86</sup> The role of a Records Manager is therefore vital for ensuring compliance to legislation, maintaining the reputation of the County Council and protecting the privacy of individuals. From the interviews and the surveys it seems rare that the Records Manager has complete responsibility for open government data. However, in one of the survey responses the Records Manager had moved from Information Technology to Legal Services to Corporate Policy but each time, had responsibility over open government data.<sup>87</sup> The survey response also conveyed that it was the Records Manager who took the initiative to take responsibility over open government data.<sup>88</sup> It was unclear from the survey, but perhaps the Records Manager was able to take responsibility of managing open government data because they had the necessary digital expertise, thus perhaps a future need for the profession is to adopt digital expertise to be involved in an open government data environment.

The role of a Records Manager in local government could also contribute to the management, retrieval and future access of published open government data. Some evidence exists of Records Managers and Information Governance Specialists from the County Council considering the future access and retention of digital data. For example the Information Management Manual encourages staff to consider the file format to ensure data ‘can still be accessed when systems migrate or update.’<sup>89</sup> Regular accessibility checks of every six months of electronic records are also advised, especially

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<sup>86</sup> Shakespeare Review, *An independent review of public sector information* (2013), at <[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/198752/13-744-shakespeare-review-of-public-sector-information.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/198752/13-744-shakespeare-review-of-public-sector-information.pdf)>. Accessed 1 August 2014, p.34, 36.

<sup>87</sup> Survey 4, (2014).

<sup>88</sup> Survey 4, (2014).

<sup>89</sup> County Council, *Information Management Manual*, (2013), p.8.

if they are saved on hard drives as well as ensuring the retention of data beyond seven years ‘to defend any legal challenge which may arise.’<sup>90</sup> The Records Management policy for the County Council outlines clearly that ‘it is the responsibility of each Directorate to ensure digital data, information and records which must be kept for longer than 7 years meet the requirements of the Digital Continuity Policy.’<sup>91</sup> The Records Manager therefore, through the production of relevant policies has the ability to encourage the future retention, management and access of data as well as directing responsibilities.

The Records Manager at the County Council suggested the future role of a Records Manager in an open government data environment might change in terms of certain datasets being created for the purpose of open government data initiatives, as they would need to influence the way in which they are created and managed for publication.<sup>92</sup> One of the survey respondents also supported further involvement of Records Managers, arguing that their responsibilities lead them to be involved in open government data in terms of metadata elements used to describe data and retention schedules.<sup>93</sup> The role of a Records Manager could therefore develop in terms of being more involved at the early stages of producing open government data and the management of published government data, thus developing the significance of the role in local government.

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<sup>90</sup> County Council, *Information Management Manual*, (2013), p.28, 41.

<sup>91</sup> County Council, *Records Management policy*, (2012), p.5

<sup>92</sup> Interview 3.

<sup>93</sup> Survey 1, (2014).

The Information Access Officer was aware of the Business Intelligence Department publishing open government data.<sup>94</sup> However, overall there was a lack of certainty over which specific departments are publishing data, conveying a challenge of a decentralised process, since it impinges on the awareness of open government data amongst the Information Resilience and Transparency Team. The Business Intelligence Officer listed some departments who were interested in publishing data, including the highways department and the types of data, which may be useful to publish, for example addresses and opening times for services of the Council.<sup>95</sup> Similar types of data were also listed in the survey responses but a broader range of data was provided, including registers for FOI disclosure logs, FOI datasets, statistical data, financial data, crime figures, population data and pupil demographics.<sup>96</sup> The interview responses and the surveys therefore reinforce the variety of data open government data entails.

The Information Access Officer described how the Information Resilience and Transparency Team were encouraging other teams to publish data, hoping to reduce the number of FOI requests they receive.<sup>97</sup> For example the Information Governance Specialist approached the School Admissions team about publishing data.<sup>98</sup> The increase in proactive release of data is therefore expected to decrease the number of FOI requests in order to potentially save resources, but this is perhaps unrealistic due to FOI requests and the publication of large datasets serving different purposes. Many teams within the County Council, as suggested by the Information Governance Specialist, are also

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<sup>94</sup> Interview 1.

<sup>95</sup> Interview 2.

<sup>96</sup> Surveys 1,2,3,4 and 5, (2014).

<sup>97</sup> Interview 1.

<sup>98</sup> Interview 4.

reluctant to publish data since they have concerns about available resources and whether members of the public will easily find the data.<sup>99</sup> The challenge of encouraging staff to publish government data was also identified in one of the survey responses. The survey respondent described how they were finding it difficult to convince staff of the utility of data and balancing the publication of data with their workload.<sup>100</sup> Concerns about the publication of private data have also led to the Data Protection Act being frequently used as an excuse not to share government data.<sup>101</sup> There is therefore a need to support local government departments to understand the benefits and principles of open government data by embedding them in the mindsets of local government processes.<sup>102</sup> The development of an open government data environment will thus require a change in mentality and culture, in favour of greater transparency.

The interviews and surveys also conveyed a lack of awareness of checks for the reliability, accuracy or integrity of data. Two of the survey respondents were not aware of any specific checks for accuracy of open government data.<sup>103</sup> However, two of the surveys showed some promise towards checking the accuracy of open government data. One of the survey respondents claimed the Authority was working towards checks for up to date information and set requirements for open government data.<sup>104</sup> Another survey respondent also indicated that internal procedures and policies are in place for checking

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<sup>99</sup> Interview 4.

<sup>100</sup> Survey 4, (2014).

<sup>101</sup> Shakespeare Review, *An independent review of public sector information* (2013), at <[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/198752/13-744-shakespeare-review-of-public-sector-information.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/198752/13-744-shakespeare-review-of-public-sector-information.pdf)>. Accessed 1 August 2014, p.22, 37.

<sup>102</sup> Chris Yiu, Policy Exchange, *A right to data, fulfilling the promise of open public data in the UK* (2012), at <<http://www.policyexchange.org.uk/images/publications/a%20right%20to%20data%20-%20mar%202012.pdf>>. Accessed 1 August 2014, p.5, 14.

<sup>103</sup> Surveys 1 and 3, (2014).

<sup>104</sup> Survey 4, (2014).

data before it is released.<sup>105</sup> The draft Open Data policy in the case study delegates responsibility to the Heads of Service of each department to ensure ‘that data published is as accurate and usable as possible’.<sup>106</sup> The Action Plan for the Records Management policy also states the development of an internal audit process, which will hopefully extend to open government data and encourage accuracy checks.<sup>107</sup> The introduction of Records Management as an audit function of open government data practices could be another development for the role of the Records Manager. Again the need for established Records Management procedures, encouraging the monitoring of data and records is highlighted and applicable to an open government data environment.

However, the difficulty of ensuring data accuracy across the whole of the County Council and implementing data checking procedures can be time consuming and may add to the workload of members of staff, as suggested by the Business Intelligence Officer.<sup>108</sup> The Finance Department for example checked the accuracy of the invoices being published, but as explained by the Information Governance Specialist this was a rare case, since the checks were so time consuming.<sup>109</sup> The Records Manager, as referred to before, expects the Records Management policy, which encourages monitoring of records for accountability purposes, to ensure accurate open government data.<sup>110</sup> However, enforcing implementation and ensuring Records Management procedures are being followed, they need to be monitored and audited. Senior management support for safeguarding data

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<sup>105</sup> Survey 5, (2014).

<sup>106</sup> County Council, *Draft Open Data Policy*, (2014), p.3.

<sup>107</sup> County Council, *Action plan for records management policy - the national archives section 46 workbook*, 18/06/2014, (2014), pp.26-28

<sup>108</sup> Interview 2.

<sup>109</sup> Interview 4.

<sup>110</sup> Interview 3.

quality is also required to ensure effective implementation of open government data initiatives.

The format and presentation of open government data was discussed with the Business Intelligence Officer, who explained that data was not always available in an open data format, due to the time and resources required for converting the data and encouraging members of staff to change their working patterns to using open data formats instead.<sup>111</sup>

A survey respondent also described the provision of data in additional formats as a challenge for the public body.<sup>112</sup> The presentation of the data at the County Council focuses on the needs and requirements of the user. The Business Intelligence Officer argued that raw data needed some form of alteration to ensure it was user friendly and members of the public could make sense of the data.<sup>113</sup> The Business Intelligence Team are looking into developing an internal Business Intelligence system which brings data together into one place and into categories, thus making data easier to locate and use.<sup>114</sup> The categories of data will also be determined by common search terms used by users.<sup>115</sup> However, placing open government data into set categories may restrict the searching of data and perhaps a 'bucket approach' of searching all data may be more appropriate, as suggested by the Records Manager.<sup>116</sup>

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<sup>111</sup> Interview 2.

<sup>112</sup> Survey 5, (2014).

<sup>113</sup> Interview 2.

<sup>114</sup> Interview 2.

<sup>115</sup> Interview 2.

<sup>116</sup> Interview 3.

Metadata can also aid the location and understanding of open government data. The Business Intelligence Officer was not aware of any metadata standards currently in place for open government data, but felt that there was a need for the standardisation of terminology to help with the searching and understanding of open government data.<sup>117</sup> The use of metadata standards as argued by the Records Manager would involve confronting the complexity of predicting users and helpful information for the understanding and use of open government data.<sup>118</sup> However, the application of metadata, as briefly outlined in the Information Management Manual may help with searching for data and understanding the creational context of open government data. The Information Management Manual explains that ‘metadata provides information about the content of the item. This may include the name of the author, date of creation, summary of content, size of document and key search terms.’<sup>119</sup> The users’ understanding of the data is therefore improved and they can begin to determine what purposes the data is appropriate for, from the metadata provided. These details may also help to convey the integrity of the data by portraying where the data originated. This may help to encourage users to trust open government data, thus helping to develop sustainable use of open government data.<sup>120</sup>

A lack of time and resources available to publish and check open government data were conveyed as challenges to the implementation of an open government data environment.

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<sup>117</sup> Interview 2.

<sup>118</sup> Interview 3.

<sup>119</sup> County Council, *Information management manual*, (2013), p.55.

<sup>120</sup> Antti Halonen, The Finnish Institute in London, *Being open about data: analysis of the UK open data policies and applicability of open data* (2012), at <http://www.finnish-institute.org.uk/en/articles/48-reports>. Accessed 18 June 2014, p.110.



The challenge of time constraints and resources in local government was also acknowledged in one of the survey responses.<sup>121</sup> The lack of resources available in local government may mean that not all data is published and therefore open government data is not necessarily the answer to complete transparency, as suggested by the Information Access Officer.<sup>122</sup> The Information Access Officer suggested the lack of resources might mean certain data is prioritised for publication, for this particular County Council this could be highway data or data concerning potholes, as these are the topic of many FOI requests.<sup>123</sup> However, the amount of data being published and prioritised will vary between County Councils, depending on the amount of resources available, therefore inconsistencies in the availability of open government data will arise. Antti Halonen is also concerned with the diversity between County Councils in an open government data environment, since they have ‘so far been able to decide themselves what kind of data to publish...there is still a certain lack of standardization procedures.’<sup>124</sup> The lack of resources and inconsistencies at local government level will mean comparisons are not achievable.<sup>125</sup> There needs to be the equitable release of local government data, in order for participation and accountability within local areas to be fulfilled. A greater Records Management profile within local government may help towards a more equitable release of data, with the monitoring of data management procedures and the implementation of related policies and standards.

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<sup>121</sup> Survey 2, (2014).

<sup>122</sup> Interview 1.

<sup>123</sup> Interview 1.

<sup>124</sup> Antti Halonen, The Finnish Institute in London, *Being open about data: analysis of the UK open data policies and applicability of open data* (2012), at <http://www.finnish-institute.org.uk/en/articles/48-reports>>. Accessed 18 June 2014, p.39.

<sup>125</sup> International Records Management Trust, *A workshop on accessing and preserving credible data* (2013), at <http://www.opengovernment.org.uk/accessing-and-preserving-data-workshop/>>. Accessed 15 July 2014, p.3.

The Information Access Officer, the Business Intelligence Officer and the Information Governance Specialist all expect open government data responsibilities to be added to their current workload, due to the lack of resources available.<sup>126</sup> The addition of open government data responsibilities to the current workload may mean that the management and publication of open government data is not made a priority, thus affecting the amount and quality of data being published. The Business Intelligence Officer argued open government data affects people's lives, but there is currently a lack of demand for the data and innovative ideas of ways to use the data, thus open government data initiatives are not currently a priority within the County Council.<sup>127</sup> The County Council's website explains open government data can provide a better understanding of local issues and how local government works. The website also encourages software or web developers to use the data for entrepreneurial uses or as part of a web application or mashup.<sup>128</sup> The County Council is therefore attempting to increase demand and use of the data by explaining the value of open government data. However, 'relatively few people are genuinely interested in going through vast amounts of information on government spending', therefore data users are often pressure groups using data on behalf of citizens.<sup>129</sup> The low levels of demand for open government data leads to questions over the type of data being published and whether it is of interest to the public and reinforces

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<sup>126</sup> Interview 1, Interview 2 and interview 4.

<sup>127</sup> Interview 2.

<sup>128</sup> Council Website about data and information, Accessed 16 July 2014.

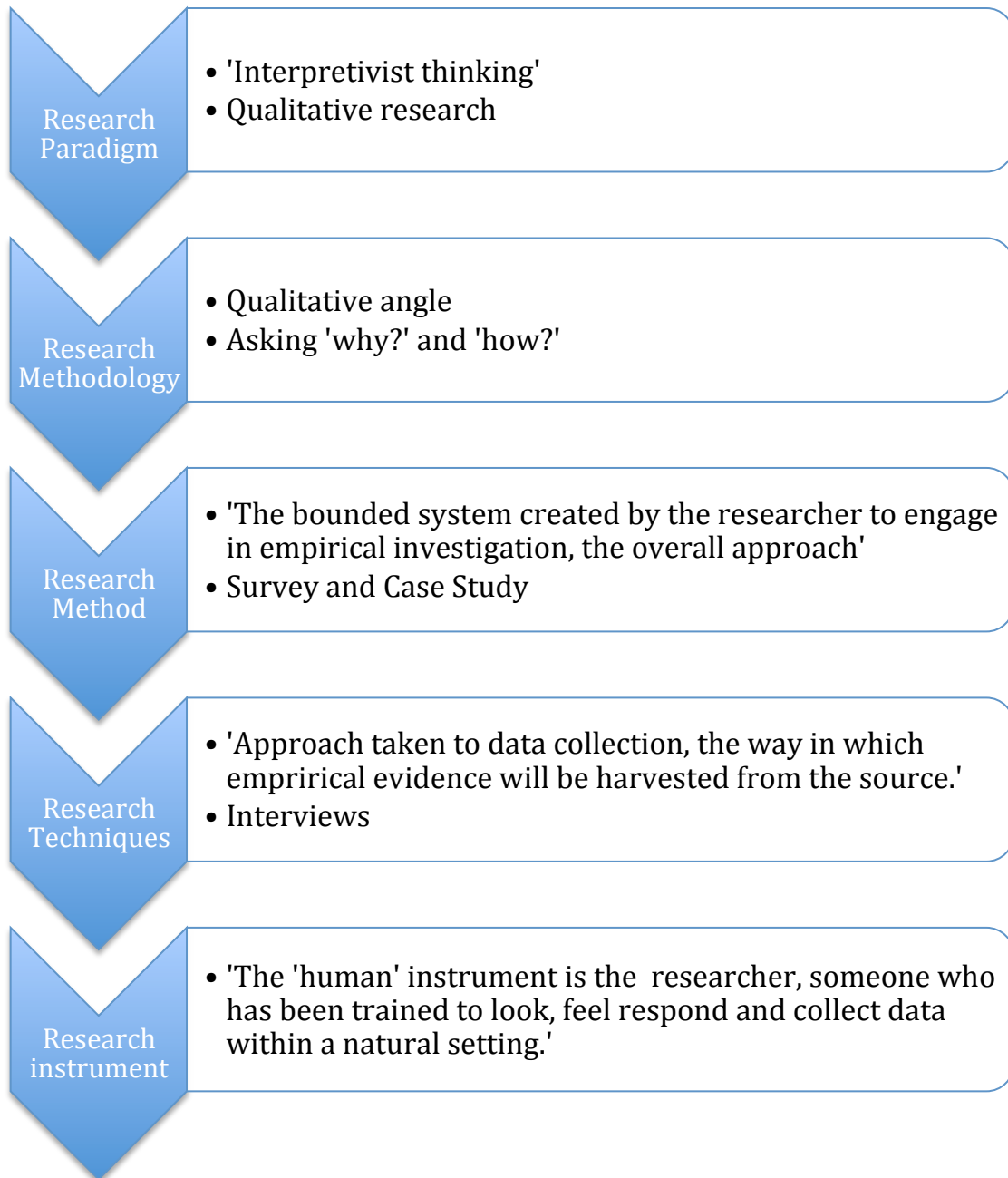
<sup>129</sup> Antti Halonen, The Finnish Institute in London, *Being open about data: analysis of the UK open data policies and applicability of open data* (2012), at <<http://www.finnish-institute.org.uk/en/articles/48-reports>>. Accessed 18 June 2014, p.78, 121.

the need for case studies using open government data, in order to portray its value to society.

Overall, the interviews, the surveys, and literature reveal that the implementation of open government data initiatives in local government require Records Management involvement in the early stages of choosing which data to publish, to ensure the security of personal data. Furthermore there is a need for well-established Records Management procedures and policies to ensure the Council is aware of what data is available and confirm personal data is marked accordingly, thus avoiding violating legislation. The time available and lack of resources appear to be two major barriers to the checking of accurate open government data. The use and value of open government data needs to be promoted, to create greater demand and awareness.

## Appendix 1: Research Hierarchy Model

Please note that the Research Hierarchy model and all quotations are referred to in Alison Jane Pickard, *Research methods in information*, (London, 2007)<sup>130</sup>



<sup>130</sup> Pickard, *Research methods*, p. xvi-xvii.

## Appendix 2: Survey



### **Team Europe Research Project 03 (2013-14): UCL**

#### **The Role of the Records Manager in an Open Government Environment in the UK**

The central aim of the project is to consider the role of recordkeepers in the context of new obligations on UK government bodies towards Open Government, Open Data and enabling greater information access to citizens. We are particularly interested in Open Government Data, specifically the proactive release of data and information by public sector organizations under the provisions of Open Government initiatives.

**Please return to Jessica Page at the following email address, [jessica.page.13@ucl.ac.uk](mailto:jessica.page.13@ucl.ac.uk).**

#### **Background information**

1. Job Title:
2. Department or Unit you work for:
3. Which of the following do you work for? Please tick appropriately

Local Government	<input type="checkbox"/>	NHS	<input type="checkbox"/>	Central Government	<input type="checkbox"/>	Other, please specify	<input type="checkbox"/>
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Please specify here:

4. Country you work within:

## Policy

1. Where is responsibility for Open Government Data located within your organization?
2. Who is responsible for managing Open Government Data initiatives in your organization? What is the scope of the work (for example advice, retention scheduling, setting standards)?
3. What Government legislation or regulations, concerning Open Government Data release, govern your organization's approach to managing Open Government Data?
4. What kinds of local policies or procedures have been issued regarding how to respond to the legislation and initiatives concerning the release of Open Government Data?
5. Are you involved in the construction of policy in relation to Open Government Data in your organization? If so please specify and explain your role.

## Operational Procedures

1. What kind of data is provided under Open Government Data processes?
2. What measures are taken by your organization to ensure the accuracy, reliability and authenticity of Open Government Data?
3. What are the main challenges you face with Open Government Data?
4. Have members of staff received training in any aspect of Open Government Data? If so please provide details of training.
5. Have you referred to any external guidance for dealing with Open Government Data, if so please provide details?

Is there anything else you would like to add? Please provide details of any relevant website addresses, which convey the nature of the Open Government initiatives within your organization?

.....  
.....  
.....  
.....

**Thank you for completing the survey. Please return the survey to Jessica Page at the following email address, [jessica.page.13@ucl.ac.uk](mailto:jessica.page.13@ucl.ac.uk)**

### Appendix 3: Survey Results and Analysis

Total number of surveys: 7. 6 of the surveys were from the **UK** and these will form the main focus of the survey analysis. 1 of the surveys was from Scotland but this will **not** be included in the analysis, as this study is focusing on the open government data environment in the **UK**.

#### Survey respondents profile:

Information Governance/Information Compliance in job title	3
Records Manager in job title	3
Working for local government	5
Working for non-ministerial public body	1
England, United Kingdom	6
Scotland	1

#### Policy:

<b>Responsibilities of open government data</b>	
Information Governance Team	2
Document and Records Management with chief executives directorate	1
Records Manager	1
Information management, IT, Data and Statistics and Communications	1
No one	1
<b>Government Legislation or regulations (some survey respondents referred to more than one piece of legislation)</b>	
Data protection Act and Freedom of Information Act	3
Transparency Code	2
Not aware of any legislation	3
<b>Local policies and procedures</b>	
Freedom of Information policy, Records Management policy and Data Protection policy	1
Not aware of any local policies or procedures	5

#### Operational procedures:

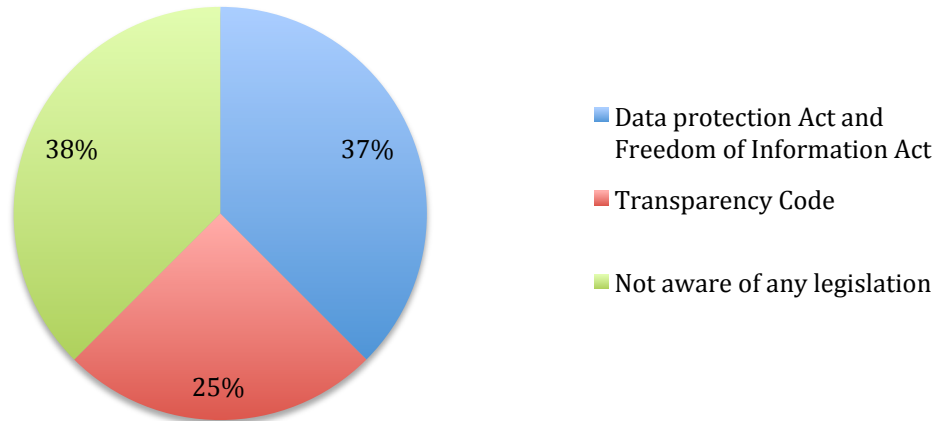
<b>Types of open government data</b>	
Registers	1
FOI disclosure logs and datasets	2
Electronic statistical information	2
Financial data-payments over £500	1
Crime figures,	1
Population data	1



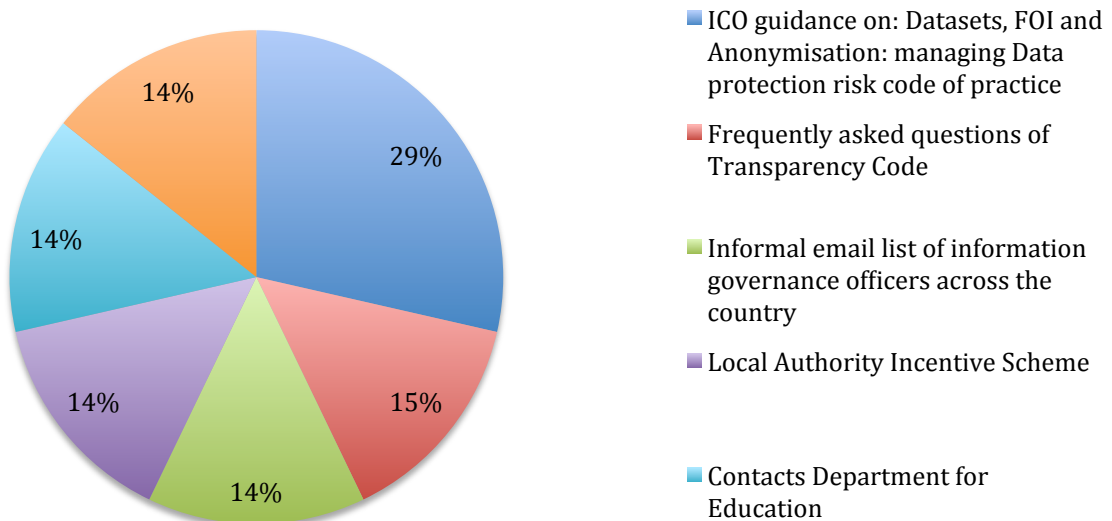
Pupil demographics	1
<b>Measures for accuracy, reliability and authenticity</b>	
Compliance with all the policies and procedures concerning the management of corporate information and records	1
Meeting requirements of Transparency Code	1
Working towards checks for up to date information and working towards legislation requirements for staff.	1
Internal procedures and policies, checking data before it is released	1
Not aware of any measures	2
<b>Challenges</b>	
Making data anonymous	1
Time constraints and resources	1
Convincing staff of utility and balancing it with other priorities	1
Providing data in additional formats at short notice	1
Not aware of any challenges	2
<b>Training for staff</b>	
Training relating to Data Protection, Freedom of Information, Information Security and Records Management	2
No training	4
<b>External Guidance (some survey respondents referred to more than one piece of guidance)</b>	
ICO guidance on: Datasets, FOI and Anonymisation: managing Data protection risk code of practice	2
Frequently asked questions of Transparency Code	1
Informal email list of information governance officers across the country	1
Local Authority Incentive Scheme	1
Contacts Department for Education	1
Not aware of any guidance	1

**Exemplifying need for direct open government data legislation, regulation and guidance:**

**Government Legislation or regulations  
(some survey respondents referred to more than one piece of legislation)**



**External Guidance**



Visualisation of top 20 words from the survey analysis tables above, with frequency in which they occur. (Daniel Steinbock, *TagCrowd* (2006), at <<http://tagcrowd.com/>>. Accessed 19 August 2014.)

aware (4) code (4) **data** (13) freedom (3)  
government (9) guidance (5)  
**information** (13) legislation (5)  
local (4) **management** (8) open (4)  
policy (8) procedures (5) protection (4)  
records (6) respondents (3) **survey** (7) training (3)  
transparency (3) working (4)

## Appendix 4: Interview Schedule

### UK County Council 11th and 15th July 2014.

#### Interviewee's role (if details not obtained prior to the interview)

1. Please can you explain your role within the County Council and the responsibilities of the department you work within?

#### Definitions

1. What do you think are the key formal elements, attributes, and nature of open government data?
2. What is meant by 'manipulated data', referred to in Minutes from an Open Data Working Group meeting on 12 Sept 2012? How is this different from 'raw data'?

#### Guidance and Regulations

1. What do you think are the obligations and regulations imposed by Central Government on the County Council in an open government environment?
2. To what extent are these responsibilities different in the new context of open government data?
3. What, if any, guidance is available for the construction and management of open government data and do you think this guidance is useful?

#### Sub Questions

1. Policies: Are there any internal and external requirements or policies in place for publishing open government data, and if so are these requirements checked before publishing and by whom?
2. How is open government data being monitored and checked against the 5 Star Scheme?
3. How are changes and alterations to open government data made and recorded?
4. Have open government initiatives impacted the number of Freedom of Information Requests, and if so in what way?
5. What descriptive or other metadata schema or standards are currently being used in the creation, maintenance and use of open government data?
6. Please explain the Data Quality Policy and Web Publishing Standards? Have Records Managers been involved in the construction and review of these policies and standards?

#### Implementation

1. What responsibilities do you have in respect of the management of open government data at the County Council?
2. What challenges have you come across in relation to the management of open government data?

3. Do you think the authenticity, reliability and accuracy of open government data at the County Council is guaranteed? And if so how?

#### Sub questions

##### Roles and Responsibilities:

1. What are the duties and tasks of the members of the Information Resilience and Transparency Team, in particular the Information Governance Specialists and the Records Manager?
2. What is the role and responsibilities of the Open Data Working Group at the County Council?
3. What are the benefits and positive aspects of open government data and how does this impact on your role?
4. Which departments of the County Council are publishing open government data? What open government data has been published so far?

##### Recordkeeping of open government data:

5. Is open government data captured in a recordkeeping system? Who is responsible for the development and maintenance of this system?
6. What is the framework (e.g., functional classification), if any, for organising open government data?
7. Is open government data linked to other media? How are the relationships made explicit?
8. In what formats is the open government data published and made accessible?
9. Has the life span and migration of systems been considered in relation to open government data and its continuing accessibility, if so who is responsible for this?

##### Staff awareness and Training:

10. Will staff at the County Council have access to the Open Data Policy and is there training for open governance and managing open government data?

##### Users of open government data:

11. Who is the open government data aimed at? How do you determine which data will be relevant to users of open government data?
12. Have you seen any evidence of open government data encouraging greater participation from members of the public in relation to decision-making processes and the improvement of services at the County Council?

#### End questions

1. What are the plans for the future in terms of the management of open government data?
2. Are there any other issues you think are important concerning open government data?



**Department of Information Studies, University College London**

**Archives and Records Management, research project being conducted by Masters student Jessica Page, [jessica.page.13@ucl.ac.uk](mailto:jessica.page.13@ucl.ac.uk)**

**The Role of the Records Manager in an Open Government Environment in the UK**

The central aim of the project is to consider the role of recordkeepers in the context of new obligations on UK government bodies towards Open Government, Open Data and enabling greater information access to citizens.

Consent form for interview respondents 11<sup>th</sup> and 15<sup>th</sup> July 2014.

- I agree that I will be interviewed for the purposes of data collection in this project.
- I agree that the data collected can be used in any reports and other outputs from the research project. I understand that the research is part of the multinational InterPARES trust project (<http://interparestrust.org/>) and the results may be published in, for example, the form of a journal article, and that the text may be made available by the University in its digital repository or in print.
- I understand that respondents will not be individually named but will be referred to by their job title in these outputs. If you wish to further anonymised please indicate here.....
- The data will be collected and stored in accordance with the Data Protection Act 1998. It will be retained for the duration of the project and for a period of up to 5 years afterwards in order to allow for re-examination of the data by the research student or his/her supervisors, and further publications.
- I understand that participation is voluntary.

Please contact the Archives and Records Management Programme Director, Doctor Andrew Flinn, at DIS UCL if you have any questions or concerns.

Many thanks for your participation.

Name of respondent:

Signed

Dated

## Appendix 6: Interview Detailed Summaries

*The detailed summaries reflect a succinct interpretation of the opinions and viewpoints of interviewees and a list of topics discussed at a UK County Council on 11<sup>th</sup> and 15<sup>th</sup> July 2014. Any direct quotes of the interviewees are provided in quotation marks.*

### Interview 1, Council Information Access Officer

#### **Track 1 [1:17:45]** [Interview with Information Access Officer 11th July 2014]:

The Information Access Officer describes their interpretation of open government data as “transparency... being able to give data to the public when they ask for it and being open about it and not hiding secrets, being fair to people about the information we hold, being open about what we spend our money on” Provides examples of open government data including invoices and spending of the Council. Discusses compliance in an open government data environment to the Freedom of Information Act, the requirement to provide information held about someone and the consequences of not providing this information. Discusses use of Freedom of Information requests as an indicator of what data needs to be published, to reduce the number of requests as members of the public can access data on the website. Variety of Freedom of Information requests received, though particularly concerning potholes, and the number of Freedom of Information requests is increasing. Restraints and limitations on data that can be published on the website, issue of resources and time available. Freedom of Information requests do not take up as much time in comparison, find the specific information requested, fewer resources required. Discussion of challenges to open government data including, resources, amount of data and software needed to publish data. “My individual perspective is that resource is a major thing on open data... it could have a negative effect, if you are taking the resource away from one area to ensure that its being so open that could have an effect on that person completing their day to day job”. [6:27] Discussions of the difference between information and data, also the Information Resilience & Transparency Team’s role of dealing with and collating Freedom of Information requests rather than dealing with open government data. Information Access Officer is not involved in drafting the policies concerning open government data this is more of a responsibility for the Information Governance Specialists. Not involved and not aware of any specific guidance concerning open government data. [9:51] Acknowledges need for relationship between Freedom of Information and open government data and need for clear guidance. Discusses need for clear definitions of datasets and the issue of guidance lacking examples and case studies to set a precedent. Guidance needed for open government data so people are aware of what their responsibilities are and provide consistency over different councils. Information Access Officer attended generic external training sessions for handling Freedom of Information Requests, also internal procedures and guidance on dealing with Freedom of Information requests. Need for generic training to include module on open government data including a clear definition and the benefits and disadvantages of open government data. [15:26] Need for awareness of open government data across the authority. Mandatory e-learning training, internal policies and guidance are available for all members of staff across the

council regarding Freedom of Information and Data Protection. Training and guidance, helped to promote awareness of team and responsibilities within the authority, leading to the transferring of more requests from other departments. [20:13] Discourse on impacts of open government data, in particular on Freedom of Information requests. Information Access Officer suggested it is easier for people to request information rather than search for the information therefore unsure whether requests will decrease. Predicts little impact from open government data environment on Information Access Officer role but perhaps more advice required from Information Governance Specialists concerning what should and should not be published, ensuring personal data is not published. [24:23] The Information Access Officer was aware of departments publishing open government data including the Business Intelligence Department. Discussion of uses of open government data, people interested in financial data and highway data, based on previous Freedom of Information requests. Wants to be aware of open government data but does not see the need for junior professional role to be involved in policies and management of open government data. Open government data environment effects more senior level roles for example, Information Governance Specialists in terms of people asking them for advice and ensuring the council is aware of their obligations and ensuring data is being proactively published. [29:38] Discussion of responsibilities and tasks of the Information Resilience and Transparency Team including information governance, safeguarding checks for adoption, fostering and child-minding, Freedom of Information, Data Protection, statistics, compliance and reports. Four Information Governance Specialists with specific areas of expertise including highways, education and social care. Data about foreign travellers is checked for any personal or sensitive data by one of the Information Governance Specialists before being published on the website. Not aware of any checks for accuracy or integrity of data before being published. Employed new members of staff and seen stability of compliance with Freedom of Information. Discusses how open government data and requests for datasets could change the workload and amount of work involved in terms of checking for accuracy and dates. [36:00] Information Access Officer perceives open government data adding to the workload and responsibilities of the team, due to the lack of resources available with cuts. Responsibilities concerning open government data are dependent on size of authority, example provided of a large authority where there are clear defined roles of Information Governance Specialists, the team leader and the Records Manager. Officers within Information Resilience and Transparency Team support Records Manager with e-learning training, but not directly involved in Records Management, aware of retention schedules and storage but not much overlap between the roles. [41:59] Discusses need for clear direction and consequences for publishing inaccurate data. Shows awareness of open government data through own research and overhearing conversations. Discusses monitoring list and audits of authorities for accurate open government data. Challenges of accessing data, not everyone has a computer, access to the Internet, updates with software and changing definitions. Need for explanation of data to understand the data and definition of accuracy, this would need to be the responsibility of operational units who have more knowledge about the data. [53:19] Records Management e-learning guidance helps with accuracy of data stating need to keep up to date and accurate records. Need for monitoring of changes to open government data. Impacts of open government data, Freedom of Information requests may become a support for open government data and



improve reputation of authority as transparent. [1.00:25] Information Access Officer felt open government data was not necessarily the answer to complete transparency as not all data can be published due to resources, most important data published first, for the authority this may be highway data and data concerning potholes due to number of requests concerning this data. Request for datasets as part of Freedom of Information Act, not able to provide dataset for request of dataset, as it was not held in a centralised way but request would be referred to Information Governance Specialists to ensure the authority had done all that was required of them in terms of responding to requests. Data needs to be managed and collated perhaps by operational units, to respond to requests and publish data in an effective way. [1:08:55] Discusses improvement of data management with internal and external guidance, training and senior managers being accountable for data management. Senior Information Risk Officer ensures the authority is compliant with new information policies to protect against security breaches. Concludes with discussion of open government data being an important issue for Information Governance Specialists and affecting the authority.

## **Interview 2, Council Business Intelligence Officer**

**Track 2 [52:20]** [Interview with Business Intelligence Officer 11<sup>th</sup> July 2014]:

Definition of open government data for local government: “ data it uses for doing its business, non personal data...and obviously for it to be open, its got to be accessible and what we would like to do is to get it into the machine readable format so that other people can actually use and re-use it”. Discusses legislation available for open government data environment, including the Transparency Code mandating the standard of data being published. Issue of data which is available on the website not necessarily being in an open data format. Transparency Code, helps with understanding what data needs to be published, the Local Government Association guidelines will be useful for understanding the standard across Local Governments. Issue of determining which data people are interested in, the Transparency Code encourages financial data but the Business Intelligence Officer was unsure whether this was what the public wanted to see published. Freedom of Information requests are very specific, not the broad data that can be published on the website. On website use GovMetrics so people can provide feedback but still difficult at the moment to determine what data people are interested in. [8:49] No guidance directly related to open government data, comes under other areas for example Freedom of Information. Not aware of any follow up guidance from Open Data White Paper and argues this focuses more on central government. Practical guidance would be useful, concerning linking and publishing data. Linking of data and use of data makes data valuable. Issue of concentrating on publishing as much data as possible or determining what people are interested in first. [13:49] No specific internal monitoring of open government data but check data being published and consider how to make data more user friendly for example using dashboards for performance measures. Discusses how raw data needs some form of work to make sense of data. Challenge of lack of resources when publishing government data, producing extra processes and justifying resources-cannot see the value of open government data, need for case studies and examples of open government data saving money. Discusses benefits of open government

data and how there is more interest in health data and district data as these affect people's lives but at local government level data may relate to services which do not affect people's everyday lives. Business Intelligence Officer predicts that it will take time for third sector groups and voluntary sector to show interest in data. [21:10] Looking into datashare, putting data into one place and into categories, to make data easier to find on the website. When looking at categories of data, looking from a user point of view in terms of search terms. Departments, which are interested and publishing data includes the highways department, education department, addresses and opening times. Checks for accuracy of data, different in each department most areas have data quality checks, but varying levels of standards of accuracy. The invoices in the Finance department are checked thoroughly before being published [28:04]. Discussion of the Open Data Working Group, different areas of the council are represented, developing an open data policy for the council. The group is aware of developments and updates for open data through emails. Open Data policy, defines what the council means by open data and looks at what kind of standard the council should be aiming for, provides overview of open data and aimed at areas where open data is a completely new concept. The policy will be available for all staff across the council and will become part of Information Governance. [31:32] Discusses the linking of data and the need to look at metadata more carefully. No metadata schemas or standards in place currently. With standards of accuracy and quality checks have to be careful of creating extra work, perhaps need for basic level but standards dependent on each department. One area where there is a need for standardisation is with terminology to help with understanding and meaning of data. [35:13] Role of Records Management in Open Data Working Group, needed for location of data and maintaining security of data by ensuring non-personal data is published. Need for checks and review of data before it is published on the website. Future cultural change in terms of people being encouraged to publish data and knowing which data to publish. More sharing and collaborative culture will develop within the council. [41:36] Expected more positive stories and interest in open government data. "I thought there might be more good stories coming out.... there has not been the surge of interest that I thought that there might be, even at a low level I thought there might be some kind of persistent groups who might actually be interested but that has not really materialised as yet but who knows you do not know who is waiting in the wings to start asking questions". Discusses the future of open government data and the number of projects in the council concerning open government data. The Business Intelligence System is in early stages but this aims to bring a lot of data together, making it easier to report and use data. Brief discussion of variety of formats used for open government data and encouraging use of open formats. [47:39] Main issue is the lack of public interest in open government data. Business Intelligence Officer feels open government data is an ongoing processes, which needs support and resources. Not aware of how open government data is being used but data does get regularly updated but there is not a performance indicator for this currently.

### **Interview 3, Council Records Manager**

**Track 3 [1:12:29] [Interview with Records Manager 11<sup>th</sup> July 2014]:**

Description of role and responsibilities: ensuring recordkeeping systems are compliant with relevant legislation, maintaining retention schedules and the information asset register. The Records Manager is part of an Information Governance team and legal services. Describes open government data as “making the data we are creating as an authority, as part of our daily business available for more general use”. Records Manager argues obligations and requirements of open government data are voluntary for local government. Discusses publishing invoices and salaries. Impacts of open government data environment: little change on professional role at the moment. Focus presently more on data being published and making it more accessible. Guidance and regulations: not aware of any directly related to open government data. Only guidance available looks at what should be published and focuses on accessibility. Internal guidance and requirements are specific to each service unit. Records Manager feels there are enough requirements in terms of constructing reliable records and data at present, if create more for open government data environment it may become too much. [7:45] Impacts on Freedom of Information requests: requests increasing and becoming more complex and people cannot find the data they need elsewhere. Requests are very specific and personal to the individual. Not all datasets have been identified as open government data, only those that have been required therefore no need for metadata schema or standard at present. Each individual unit has data quality policy manager with specific areas of expertise. Issue with policies being overarching and too generic, therefore better to have specific policies in place due to the size of the authority. [12:57] Management of open government data: responsibility of Business Intelligence team. The Records Manager is working with the team to identify information assets that need to be available. Records Manager ensures guidance is available to make employees jobs easier. Records Manger’s role is to ensure data is produced and what happens afterwards is perceived as outside of the remit of their role. Reliability and authenticity of data ensured, with strong Records Management and the need for reliable data to complete jobs properly. [19:40] Role of the Open Data Working Group have not met for a while due to open data being lower down on the agenda with organisational changes and shifts. The Council is still very much on a paper-based system, which makes it difficult to identify datasets that need to be made available. Role of Records Manager is in terms of information security and providing the information asset register. The information asset register is described as a “three-tired document”, listed by information owners and links physical records with the internal system, it is a form of inventory, which links back to the retention schedule. Role also includes ensuring protective marking of records, to guarantee personal or confidential data is not published as part of open government data initiatives. Discusses issue of nearly all-electronic records containing client-based data, which means they need to be protected and fall under the Data Protection Act. Discusses how the ICT department is responsible for conducting risk assessments and then the risk assessment reports are kept centrally with the Records Manager. Eventually will become the Information Asset Owners decision about the risks involved and publication of the data. [31:06] Variety of guidance and manuals for policies concerning Records Management, Freedom of Information and Data Protection available to staff on the intranet. Information governance e-learning module is mandatory for staff. Open government data environment like Records Management will be dealt with differently in individual local authorities depending on resources, infrastructure and priorities. The Records Management Manual

focuses on providing tools to provide all the data made available in an open government environment. Records Management Policy and Manual focuses on producing reliable, usable records and this will not change in an open government environment. [40:45] Discussion of Data Quality Policy re-iterates the need for reliable data for transparency. Also discusses external guidance and the difficulty of operations varying within each individual authority or organisation. [42:59] Published data is not the responsibility of the Records Manager; in the authority once data has been published it becomes the responsibility of Corporate Communications. Once data is in the public domain it does not need to be protected, role of the Records Manger is to look after data that needs to be protected and not published. Website and presentation of open data: standardised presentation across most authorities but still challenging to locate and find data. [47:20] Retention and future access of data, Corporate Communications will review this and agree this with the creator of the data. The Records Manager felt a “bucket approach with a search engine” would be better rather than categorising data. Metadata not available for data, published in raw format. Data may be used for the production of apps and technology but overall, hard to predict the use of data. [50:53] Impact on number of Freedom of Information Requests, may produce more requests as people become more interested in what data is held by local government. Discussion of who open government data is aimed at: Freedom of Information requests are very specific and therefore Freedom of Information requestors would probably not use large datasets produced as part of open government data. Discusses open government data used by app producers. Crime data and school data are found to be useful and used by many. Used by journalists. People unlikely to search data in depth. Open government data being driven by commercial companies who are interested in what data local government collects and how they can add value to the data. [56:09] Discussion of the Transparency Code, helps to determine what data a local government can publish, understanding what the public have a right to know and protecting privacy of individuals. Discusses International Standards regarding Records Management, argues anything that improves reliability of records will feed into reliable open government data as an output. “Freedom of Information took Records Management to the top of the agenda”. Information security and risk management will impact the role of the Records Manager in terms of when and what data should be produced. Open data will only effect Records Management role when it begins impinging on what records the local government is creating in terms of creating certain datasets for purposes of open government data and to be used by others. “Records Management is there to support the infrastructure.” [1.03:55] Open data still in very early stages but may create changes with outsourcing providers and data being managed in different ways in different areas. An electronic system is not available to extract data, therefore publishing data is currently time consuming and there is a financial cost of extracting data manually. Responsibility of extracting data needs to be someone or machine between the operating unit creating the data and the person publishing the data. Number of Freedom of Information Requests, last year (2013) was 2000 and close to 2,500 requests this year (2014). Issue of open government data potentially creating another team. Argues it is a time of cutting down on services, open government data is therefore not necessarily seen as core to the authority’s function. Central government requirements are based on the assumption of electronic systems being in place.

International Standards may restrict the open government environment, since it would not be able to develop and change as easily.

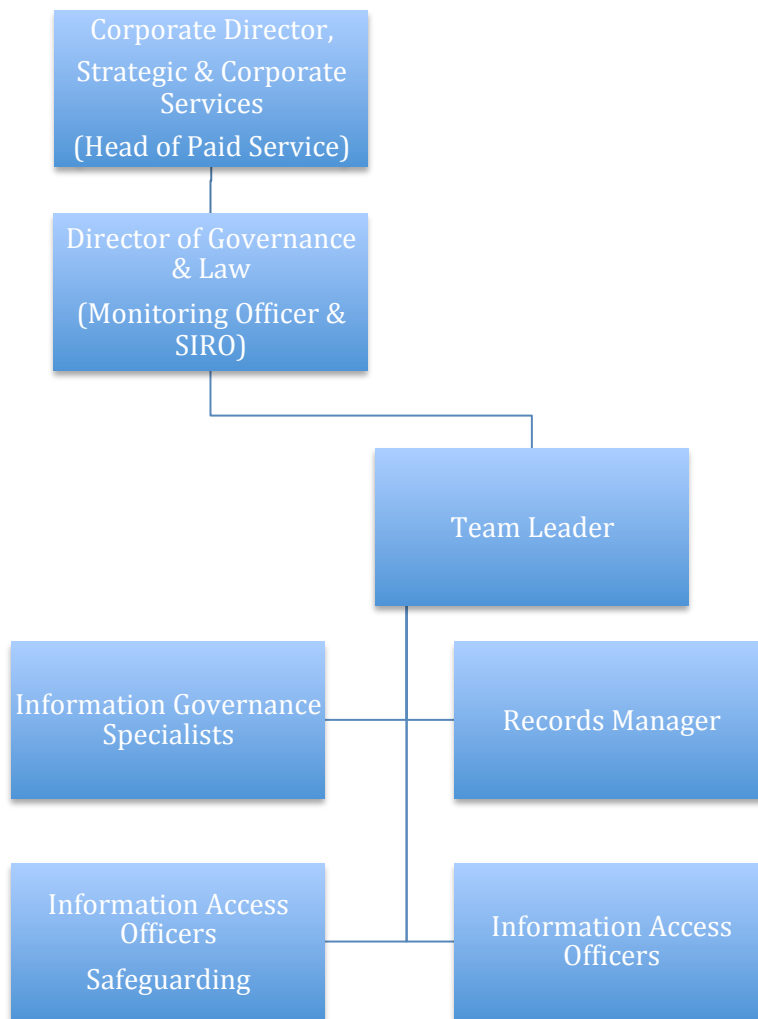
#### **Interview 4, Council Information Governance Specialist**

**Track 4 [48:29]** [Interview with Information Governance Specialist 15<sup>th</sup> July 2014]:

Definition and key aspects of open government data: “being open and transparent”. Type of data being published, for example: invoices. Discusses impacts on Freedom of Information requests: increasing but not due to data being published on the website. Involved in open government data activities with the publication of invoices, ensured consistency across directorates. The Information Governance Specialist assisted with how to get the invoices published on the website and what information to publish. A lot of the data was personal and therefore could not be published. Finance team were responsible for preparing the data to be published on the website. The County Council was publishing types of data, which were listed in the Code of Practice [Transparency Code]. Found the Transparency Codes useful in terms of determining what data to publish. Since publication of invoices, the Information Governance Specialist was not made aware of what happened afterwards but looks occasionally to check the data is on the website. Information Governance Specialist felt the major priority and concern is ensuring personal data is not published. Redacted data if it referred to individual names. Invoices were recorded and checked for accuracy of data but this was a one-off instance due to the process being time consuming, this was the responsibility of the Finance department. [10:03] Departments publishing data: Finance, Business Intelligence, publishing demographic data and all types of datasets across the authority. Discusses the members and the duties and tasks of the Information Resilience and Transparency Team: three Information Governance Specialists and team leader-they deal with complex issues around Data Protection, Freedom of Information, Data sharing and Environmental Information Regulations and Data security. All carry out training and information governance workshops. [13:58] Discusses guidance: argues similar guidance for Freedom of Information Act is needed for open government data environment, as struggled when working with Finance department on invoice publication three years ago. Found the Transparency Code useful, but challenge of reaching standards of the Code. Would have found it useful to discuss with other councils in a forum, found forums useful with the Freedom of Information and the Data Protection Act. [16:22] Discusses the impacts of open government data on their professional role. Not fully aware of whom is dealing with open government data and not involved with the team. Issue of the Information Resilience and Transparency Team having heavy work load and not being able to cope with open government data, but would like to know about the handling of open government data within the County Council: “our team probably have enough to deal with at the moment...the number of Freedom of Information requests and the number of Subject Access Requests under Data Protection are going up on a weekly basis really so I am not sure we could cope with doing much more but having said that it would have been nice to perhaps be aware of what is going on because we did have that initial involvement and now we do not get to hear of anything”. Teams within the Council ask the Information Resilience and Transparency Team for advice at the start of projects and then

do not provide follow up information on the development of the project. Information Governance is a growing industry and members of staff may not have the time to get involved in open government data. [20:44] Need for mechanism or requirement for staff to read policies with regards to Data Protection, Freedom of Information and open government data. Open government data aimed at the general public, the public is more aware of rights and what information they should have access to, which is indicated from the number of Freedom of Information requests. Issue of variety of requests and so open government data will not stop the number of Freedom of Information requests. Increase in the number of Freedom of Information requests, due to awareness in the press of the Act and legislation. [26:07] The Information Governance Specialist acknowledged a relationship between Freedom of Information and open government data but was unaware of any impacts at the moment of open government data. The Information Resilience and Transparency Team encourage other teams within the Council to publish data, so they do not have to keep responding to Freedom of Information requests but issue of resources with checks of data and changing mindsets, discusses how there are reservations about publishing data. Reservations from teams within the Council about whether published open government data will be easy to find. [31:28] Involvement in open government data: information security role and ensuring personal data was not published. The Information Governance Specialist was concerned about the Information Resilience and Transparency Team's lack of involvement in open government data, since it may mean that private data may have been published. Redaction of data is portrayed to members of the public with an annotation. The Information Governance Specialist was not aware of any accompanying metadata with open government data. [34:43] Issue of data being published, which may not be sufficient: need to consider who is using the data. The Information Governance Specialist felt it was difficult to determine who is using the data and why. Challenge of the way data is being entered into the systems, in terms of the quality of the data and the inputting of data incorrectly means that data being published and checked can be time consuming. Encouragement of Senior Information Risk Owner to approach teams to publish certain data, Information Governance Specialist approached the school admissions team, as at certain times of the year the team receives a high number of requests concerning school admission criteria, but problem of schools admission team not seeing the benefits of publishing data and perceiving the requests as individual and specific. [41:46] Important issues concerning open government data: issue of what you publish and what people will look at and considering the resources available and whether it is worth publishing the data. Discusses the publication scheme and disclosure log: publication scheme gets few hits and disclosure log gets more requests, which tends to be the press who will then ask for responses to requests. Not able to publish responses to requests, due to the time consuming process of redacting data of personal data before publishing. Issue of members of the public preferring to request and ask for data rather than look for the data. The Information Governance Specialist acknowledged the need to gain public trust and how local government's should be held accountable but not convinced open government data will be used on a regular basis and will be used by only a small number of the population. Wants to be aware of open government data, what data is being published but not necessarily involved in open government data activities.

## Appendix 7: Structure of the Information Resilience and Transparency Team



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