

Service Improvement Team

MAY 2011

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Royal Borough of Kensington and Chelsea

TRANSPARENCY POLICY

PUBLIC DATA PRINCIPLES



THE ROYAL BOROUGH OF
KENSINGTON
AND CHELSEA

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FOREWORD

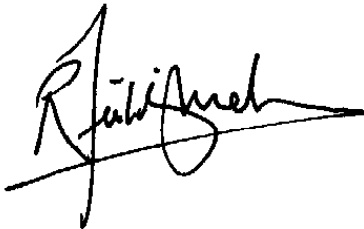
The Royal Borough is committed to being responsive and accountable to the people it serves. We have already responded positively and swiftly to the new requirements on local government to publish local spend data and senior salaries information, and our 'Transparency Portal' on the Council's website has been cited in national guidance as an example of good practice. Yet we are ambitious to do more. We want to be transparent and open in order to:

- increase our performance;
- drive out inefficiencies; and
- reassure residents that we are spending public funds wisely.

Transparency is one of the Coalition Government's central policy tenets and is at the heart of the Government's commitment to enable the public to hold politicians and public bodies to account. With the removal of much of the external assessment framework imposed on local authorities in the past, such as the Comprehensive Area Assessment, the focus of accountability has shifted away from central government and towards local people.

I am pleased to introduce the Council's Transparency Policy and Public Data Principles which reinforce the Council's commitment to be fully accountable to its residents and service users. It details the expectations the Council has for services and business groups around the transparency agenda, and describes a set of principles to be employed by all those who deal with data that is in the public domain.

I hope you find the Policy and Public Data Principles helpful.



Councillor Feilding-Mellen
Cabinet Member Civil Society

INTRODUCTION

Transparency¹ is a central tenet of the Coalition's Big Society agenda; it is at the heart of the government's commitment to enable the public to hold politicians and public bodies to account. It is also seen as a powerful means of promoting efficiency. Public bodies are now required to demonstrate openness and transparency in all areas of their business.

The Secretary of State for Communities and Local Government wrote to all local authorities in June 2010 committing them to publishing items of spend over £500 by January 2011. Local authorities must also publish contracts and tenders data as well as salary data for senior management staff along with supporting organisational and contextual information.

Local authorities have since been challenged to go further by giving easy open access to public data on councillor expenses, financial position, performance data, licensing applications, planning applications and decisions, transport information, frontline service data and hygiene reports for food outlets – the Transparency agenda affects us all!

BACKGROUND

The Council has a long standing ambition to be accountable to its residents and there are various ways in which the Council works to ensure that residents are informed about key areas of the Council's business. For example, the Council publishes accurate and timely performance information, in the form of 'Vital Signs' reports. Also, a digest of Council financial information is produced in the form of 'Vital Finances', which provides a comprehensive source of financial data presented alongside contextual information.

However, the Transparency agenda places a different emphasis on accountability. The publication of raw data is seen as an important way of enabling the public to hold public bodies to account in new ways. Whilst the Council will continue to provide performance and financial information in context to help residents understand how the Council performs, raw data will also be made available so that interested and data-literate parties are able to analyse and manipulate the data as they see fit.

PURPOSE OF THIS GUIDANCE

Detailed national guidance is already available on the publication of:

- [Contracts and tenders data](#)
- [Senior salary information](#)
- [Local spend data](#)
- [Equalities data](#)

It is not the purpose of this guidance to duplicate that which has already been published. Instead, this guidance sets out some basic guiding principles for business groups when publishing data in the public domain. These principles will help to ensure that the open data

¹ NB – definitions of underlined words can be found in the glossary on page 15.

requirements of the national guidance are met and that basic standards are understood and upheld across the Council.

A NOTE ON THE GUIDANCE

The Transparency agenda is an evolving one. The Royal Borough will respond to best practice as it develops whilst also taking a proactive approach to reviewing current practice and pursuing higher standards.

This guidance will be kept under review and will be regularly updated in order to reflect national government requirements as well as the Council's evolving approach. The most up-to-date version of this guidance can be found at:

<http://kcintranet/C2/C14/Transparency/default.aspx>

RELATED DOCUMENTS

[Data Quality Framework](#)

Currently under review

Data Governance Policy

Sets out the responsibilities of data owners, data intermediaries and publishers in relation to data on the council's external website - *to be finalised*

Devolved Web Publishing Guidance

Details the principles of web content management – *to be finalised*

[Information Sharing Policy](#)

Sets out the council's framework for the effective sharing of personal information

[Freedom of Information \(FOI\) Publication Scheme](#)

Sets out what information the local authority publishes or intends to publish as a matter of course, how this information will be published, and whether the information is available free of charge².

[Data Protection Policy](#)

Sets out best practice for handling personal data in a way that respects the privacy of individuals and complies with the Data Protection Act 1998.

² NB/ The Freedom of Information Act 2000 gives members of the public a general right of access to information held by the Council. The Environmental Information Regulations 2004 (EIR) provide an additional right of public access to environmental information.

THE OPEN GOVERNMENT LICENCE

Any published data which falls under the definition of ‘public data’ should be provided free for reuse. This enables members of the public, as well as other organisations, to interrogate and analyse the data in ways they see fit without excessive restrictions.

Public sector information is already covered by the Re-use of Public Sector Information Regulations 2005. The aim of the regulations is to encourage the re-use of public sector information by removing obstacles that stand in the way of re-use.

The Open Government Licence (OGL), published by the National Archives, has been introduced by Government to complement these regulations and to further remove obstacles to transparency. The Licence has been adopted by the Royal Borough, in relation to specific data sets provided on the Transparency Portal, to ensure that this data is made available for use and re-use in line with Government expectations.

Under the terms of the OGL data users are free to:

- copy, publish, distribute and transmit the Information;
- adapt the Information;
- exploit the Information commercially for example, by combining it with other Information, or by including it in their own product or application.

There are a number of exemptions and conditions attached to the licence – for more information visit:

<http://www.nationalarchives.gov.uk/information-management/government-licensing/about-the-ogl.htm>

THE ROYAL BOROUGH'S PUBLIC DATA PRINCIPLES

❖ **Public data should be released in its raw state where possible.**

Data is likely to be of most use in its raw format. In order for the public to be free to interrogate the available public data as they see fit, business groups and services need to ensure that the data they release part of the Transparency agenda has not been processed or manipulated unnecessarily.

❖ **Public data should be as complete and detailed as possible.**

A balance needs to be struck between providing too much data, overwhelming the user, and too little data, limiting the usefulness of that which is provided. The data that you do decide to publish should be as complete as possible.

❖ **Public data should be timely.**

Data should be released as quickly as possible after it is produced. Speed may mean that the first release may have some inaccuracies; more accurate versions should be released when available.

❖ **Public data should be accurate.**

Do not knowingly publish inaccurate data. Where errors in published data are discovered, or files are changed for other reasons (such as omissions) revised information should be published making it clear where, how and why there has been an amendment. The level of accuracy of the published data should be made explicit.

❖ **Public data should be made available through the Council's Transparency Portal.**

The Council website has a dedicated web-page, the [Transparency Portal](#), which provides an easy to use single access point for transparency data the council has published so far. The Portal should be used to publish public data which is required by national guidance and / or has been requested by members of the public and / or is considered, by service managers, to be of interest to the public.

The Transparency Portal should be used for the publication of raw data only. Raw data should not be published to service web-pages: these pages should be task focused (e.g. pay a bill, book a service) and as user friendly as possible (see the 'Data Governance Policy' and 'Devolved Web Publishing Guidance' for more information). Instead, a link should be provided on service web pages to the Transparency Portal, and vice versa, where necessary.

To publish something to the Transparency Portal contact the Service Improvement Team.

❖ **Public data should be published in reusable, machine-readable formats.**

In order to be transparent, data not only needs to be published, it also needs to be reusable and to make it reusable it needs to be machine-readable. Data should firstly be published as quickly as possible in the format which is most readily available. The same data should then be made available in machine-readable formats, for example Comma Separated Value (CSV). It should then be published as an easy to read portable document (such as PDF). See **Appendix A** for a note on machine-readable formats.

- ❖ **Public data should be released under the Open Government Licence (OGL).**
Data published on the Council’s Transparency Portal is to be made available under the Open Government Licence if appropriate. Make sure that you are familiar with the terms of the licence and understand how this applies to the data that you are publishing.
- ❖ **Local public data policy and business group practice should be clearly driven by the public who want and use the data.**
Business groups and services should seek to understand what their service users and communities want in terms of public data, and release it in a way that allows the public to analyse, interrogate and present the data as they see fit. Publication of data should be demand led.
- ❖ **Business groups and services should actively encourage the re-use of public data.**
In addition to publishing the data itself, services and business groups should provide supporting information and guidance where necessary to help people understand the published data sets, enabling them to reuse the data easily and effectively.

DATA INVENTORY

All public bodies are required to maintain and publish inventories of their data holdings. The Service Improvement Team is seeking to compile an inventory of all public data sets published by business groups as part of the Transparency agenda.

If you have recently published data in the public domain as part of the Transparency agenda, or are planning to in the near future, then please contact the Service Improvement Team so that this can be included in the inventory.

FREQUENTLY ASKED QUESTIONS

WHAT IS THE DIFFERENCE BETWEEN DATA AND INFORMATION?

Data are numbers, words or images that have yet to be organised or analysed to answer a specific question. Information is produced through processing, manipulating and organising data to answer questions, adding to the knowledge of the receiver³. The Transparency agenda is concerned with publishing data so that it can be processed by members of the public into information that is of use to them.

WHY SHOULD DATA BE PUBLISHED?

By publishing key data sets, the Council will ensure that it remains fully accountable to its residents and members of the public. The Coalition Government's Localism and devolution agendas have replaced top-down external inspection with local accountability. It is hoped that the publication of public data will enable greater transparency, greater engagement and greater efficiency by allowing inspection by residents, peer comparison and reuse of the data in applications and analysis.

The publication of public data will also highlight any inefficiency and will help to open new markets for local business, the voluntary and community sectors and social enterprises to run services or manage public assets.

WHAT DATA SHOULD BE PUBLISHED?

Public data which is specifically required by national statute and guidance should be published. This currently extends to:

- Contracts and tenders data
- Local spend data over £500
- Senior salary data and supporting contextual information
- Equalities data

The Government has also signalled that it will be pushing for greater transparency in other areas. The following data, which is already available on the Council's website, should be made available via a link on the Transparency Portal:

- Councillor allowances and expenses
- Council minutes and papers
- Council job vacancies
- Licensing applications and decisions
- Planning applications and decisions

Business groups should think about publishing data in the following areas:

- Frontline service data: including, but not limited to, rubbish and recycling rates, council tax collection rates and details of major planned projects.
- Food hygiene reports for food outlets
- Grants and payments to the voluntary sector

The publication of public data in these areas is at the discretion of service managers.

³ *Improving Information to Support Decision Making: standards for better quality data*, Audit Commission (Nov 2007).

Business groups and services should adopt a proportionate, demand-led approach to the publication of data-sets outside of these lists, responding to the needs and wishes of residents and service users where possible’.

WHEN SHOULD DATA BE PUBLISHED?

Data should be published as quickly as possible after it has been produced. For example, financial data should be published on a monthly or quarterly basis depending on the established reporting cycles and functionality of in-house systems.

WHERE SHOULD DATA BE PUBLISHED?

Raw public data, being released as part of the transparency agenda, should be published on the Transparency Portal on the Council’s external website. In most instances, processed data and performance information not specifically linked to the transparency agenda is probably better suited to individual service web-pages.

HOW SHOULD DATA BE PUBLISHED?

Initially data should be published in the most readily available format in order to ensure timeliness. Data should then be re-published in both machine-readable formats (i.e. CSV) and portable document formats (PDF). See **Appendix A** for a note on machine-readable formats.

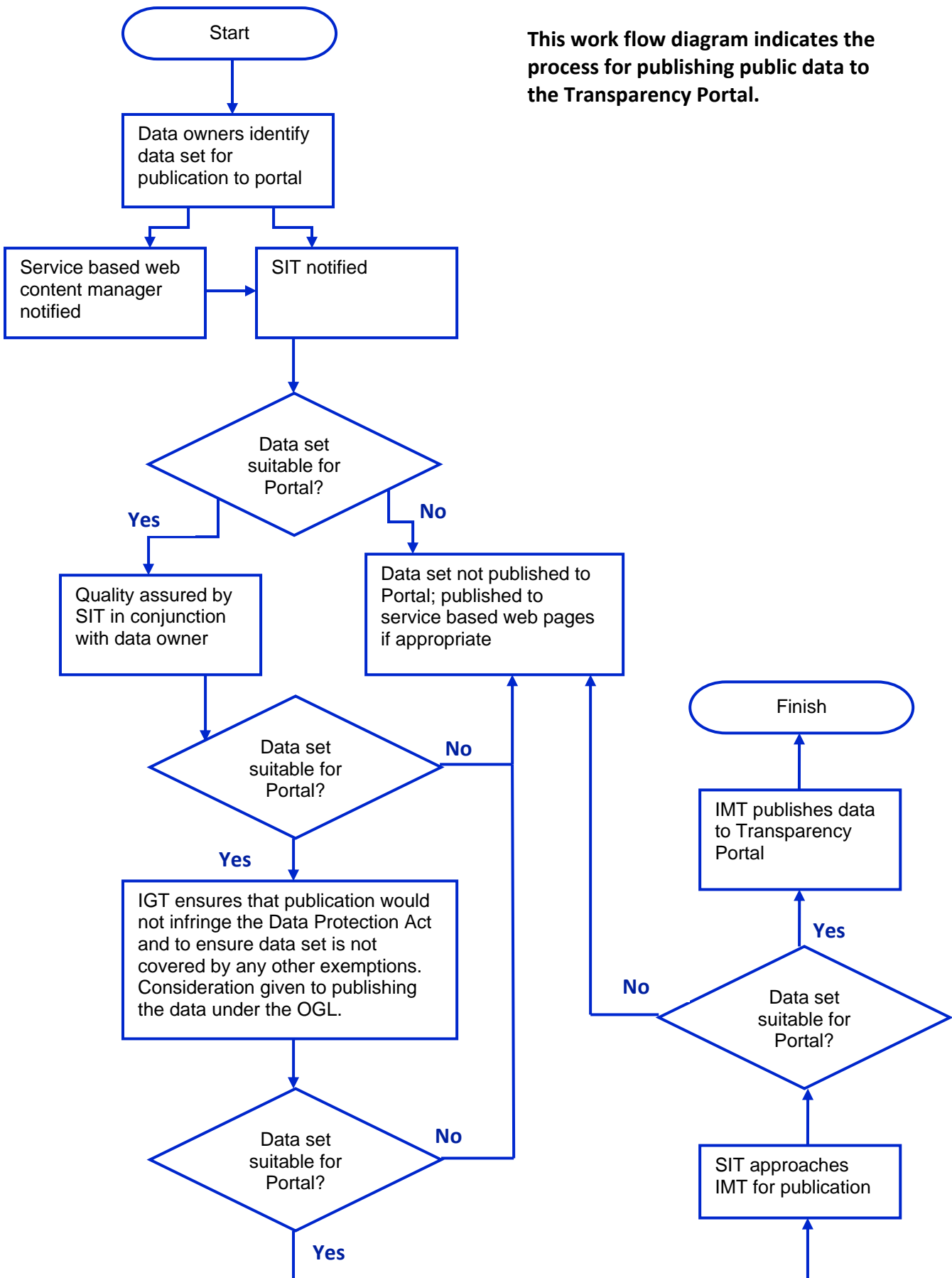
ROLES AND RESPONSIBILITIES

	ROLE / RESPONSIBILITY
<p>INTERNET AND MEDIA TEAM (IMT)</p> <p>Data Publishers</p>	<p>In consultation with data owners and data intermediaries, responsible for the inclusion, editing or removal of any data on the Council website and Transparency Portal.</p>
	<p>When discussing the publication of data with data owners, responsible for ensuring discussion of the Open Government Licence and its implications is part of the decision making process for making that specific data available on the website.</p>
	<p>Responsible for ensuring all Council related policies, standards and communication best practice is adhered to when publishing content to the Council website or Transparency Portal.</p>
	<p>Responsible for making any changes or revisions to data published on the Transparency Portal at the behest of data owners in a timely fashion, ensuring that any revisions or new versions of the same document are clearly indicated.</p>
	<p>Responsible for approving all edits on the Transparency Portal</p>
<p>SERVICE IMPROVEMENT TEAM (SIT)</p> <p>Data Intermediaries</p>	<p>Responsible for approaching IMT on the behalf of data owners to publish data to the Transparency Portal. All new data proposed for the website is reviewed with reference to the Data Quality Framework and the Transparency Policy.</p>
	<p>Responsible for approaching the Information Governance Team on behalf of data owners to ensure that publication of data sets does not infringe the Data Protection Act and to ensure data proposed for publication is not covered by any other exemptions.</p>
	<p>In consultation with data owners and IMT, decide what new content will be added to the Transparency Portal.</p>
	<p>Quality assurance – in conjunction with data owners and service based web content managers, responsible for ensuring data published on the Transparency Portal is accurate and up to date. SIT does not have a quality assurance role for data published to other areas of the Council website (even if this data can be accessed through the Portal via a link).</p>
	<p>In conjunction with data owners, responsible for ensuring that the data sets required by national government are published to the Transparency Portal in a timely manner.</p>

SERVICE BASED WEB CONTENT MANAGERS Data Intermediaries	To act as the first port of call for service based data owners who require publication of data sets.
	Responsible for referring data owners to SIT if data sets are better suited to publication on the Transparency Portal rather than service based web pages.
	Responsible for editing data sets which are published to service based web pages.
SERVICE MANAGERS Data Owners	Responsible for ensuring that data published on or through the Transparency Portal is up to date and accurate.
	Responsible for identifying appropriate data sets for publication to the Transparency Portal and approaching SIT for publication.
	Responsible for raising awareness of the Transparency Policy with other data owners within their teams.
	Responsible for communicating any changes, revisions or updates affecting data published to the Transparency Portal to IMT as soon as possible, clearly indicating: <ul style="list-style-type: none"> • the version number of the document; • the changes, amendments or revisions made; • the reasons for the changes, amendments or revisions; • the date of the change, amendment or revision.
INFORMATION GOVERNANCE TEAM (IGT) Data Experts	Responsible for ensuring that publication of data sets does not infringe the Data Protection Act and to ensure data proposed for publication is not covered by any other exemptions.
SERVICE IMPROVEMENT BOARD (SIB)	Responsible for overseeing the implementation of the Transparency agenda and to have oversight of the development of the Transparency Portal. From time to time it is likely that the SIB will receive reports and updates on the transparency agenda. The minutes of the Service Improvement Board can be found here .
PUBLIC CONFIDENCE COMMITTEE (PCC)	The Public Confidence Committee is yet to be established, but it is intended that a committee be set up in order to oversee and direct transparency work happening across the organisation.

WORK FLOW DIAGRAM

This work flow diagram indicates the process for publishing public data to the Transparency Portal.



GLOSSARY

Accuracy

Accuracy of data is the degree to which data correctly reflects the real world object or an event being described. Data should be sufficiently accurate for its intended purpose.

Examples of data accuracy:

- The address of customer in the customer database is the real address.
- The temperature recorded in the thermometer is the real temperature.

Comma Separated Value

The comma-separated values file format is a set of file formats used to store tabular data in which numbers and text are stored in plain textual form that can be read in a text editor. Lines in the text file represent rows of a table, and commas in a line separate what are fields in the table's row.

Completeness

Completeness of data is the extent to which the expected attributes of data are provided. It is possible that data is not available, but it is still considered complete, as it meets the expectations of the user.

For example, a customer data is considered as complete if:

- All customer addresses, contact details and other information are available.
- Data of all customers is available.

Data

Data are numbers, words or images that have yet to be organised or analysed to answer a specific question.

Information

Information is produced through processing, manipulating and organising data to answer questions, adding to the knowledge of the receiver.

Open data

Open data is a practice requiring that certain data be freely available to everyone, without restrictions from copyright, patents or other mechanisms of control.

Processed data

Processed data is data that has been classified, sorted, merged, recorded, retrieved, transmitted, reported or manipulated in some other way either manually or by computer.

Public data

Public data is the objective, factual, non-personal data on which public services run and are assessed, and on which policy decisions are based, or which is collected or generated in the course of public service delivery.

Raw Data

Raw data is a term for data collected on source which has not been subjected to processing or any other manipulation; it is also known as primary data. Raw data can be input to a computer program or used in manual analysis procedures such as gathering statistics from a survey.

Timely

Timeliness means that data is captured as quickly as possible after the event or activity and must be available / published within a reasonable time period.

Example of Data not being timely:

- The financial statements of a company are published one month after the year-end.
- The census data is available two years after the census is done.

Transparency

Transparency means accountability and openness. It is about public data being freely accessible in the public domain and it is acknowledging that the public have a clear right to know and a right to challenge.

USEFUL LINKS

Local Transparency: A practitioner's guide to publishing new contracts and tenders data -
<http://lgnewcontracts.readandcomment.com/files/2011/04/Local-transparency-a-practitioners-guide-to-publishing-new-contracts-110331.pdf>

Local Transparency: A practitioner's guide to publishing local spending data -
<http://localspending.readandcomment.com/files/2011/02/LocalSpendingData-APractitionersGuide-V7-10.pdf>

Local Transparency: A practitioner's guide to publishing senior salary information -
<http://localsalaries.readandcomment.com/files/2011/01/Salary-Disclosure-Guidance-v7.2.pdf>

Code of recommended practice for local authorities on data transparency (consultation) -
<http://www.communities.gov.uk/documents/localgovernment/pdf/1829193.pdf>

New public sector Equality Duty guidance -
[http://www.equalityhumanrights.com/advice-and-guidance/public-sector-equality-duty/guidance-on-the-equality-duty/#Guidance for England and non devolved bodies in Scotland and Wales](http://www.equalityhumanrights.com/advice-and-guidance/public-sector-equality-duty/guidance-on-the-equality-duty/#Guidance%20for%20England%20and%20non%20devolved%20bodies%20in%20Scotland%20and%20Wales)

The Government's Open Data website - <http://data.gov.uk/>

The Open Government Licence -
<http://www.nationalarchives.gov.uk/doc/open-government-licence/>

About the Open Government Licence -
<http://www.nationalarchives.gov.uk/information-management/government-licensing/about-the-ogl.htm>

Information Commissioners Office - Data Protection and Freedom of Information advice
<http://www.ico.gov.uk/>

For further information please contact:

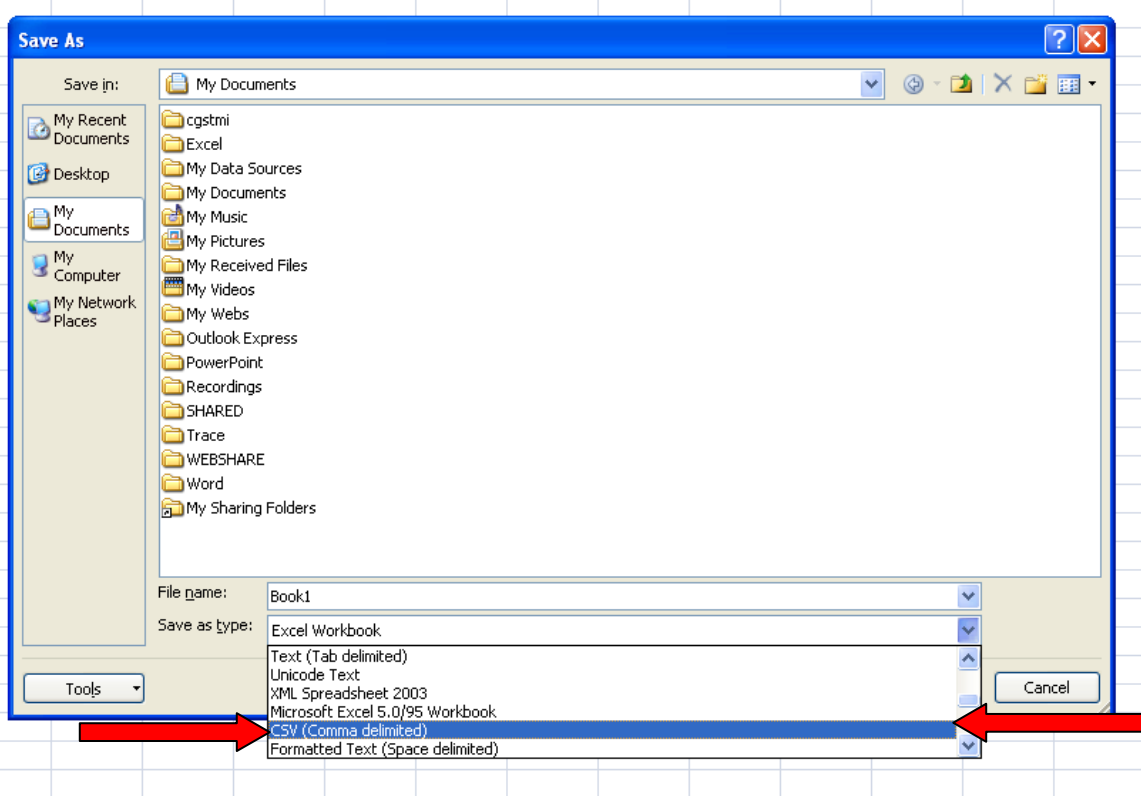
Service Improvement Team
020 7361 3691
service.improvement@rbkc.gov.uk

A NOTE ON CSV MACHINE-READABLE FORMAT

Data should be published in two main formats:

- A document in pdf format which is easy to read and printer friendly
- A spreadsheet which is machine-readable for easier reuse and analysis – the most common format is CSV.

The easiest way to do this is to convert a Microsoft Excel file to CSV. This can be achieved by using the 'save as' function, selecting 'CSV (comma delimited)' as the file type.



In a CSV file:

- there should be a single header line
- each data record should be on one line
- data fields must be separated by a comma character (only if not already in separate columns as in Excel)
- text values that contain a comma must have double quotes (") at the start and end of the value (i.e. "Kensington, London")
- there should be no comment lines, no 'total' lines and no blank lines
- '£' signs should not be included

Example

The following example applies if you are not using an Excel spreadsheet to present your data.

Year	Make	Model	Description	Price
1997	Ford	E350	Ac, abs, moon	3000.00
1999	Chevy	Venture "Extended Edition"		4900.00
1999	Chevy	Venture "Extended Edition, Very Large"		5000.00
1996	Jeep	Grand Cherokee	MUST SELL! air, moon roof, loaded	4799.00

The above table of data may be represented in CSV format as follows (i.e. in Notepad if not using an Excel spreadsheet):

```
Year,Make,Model,Description,Price
1997,Ford,E350,"ac, abs, moon",3000.00
1999,Chevy,"Venture ""Extended Edition""",",4900.00
1999,Chevy,"Venture ""Extended Edition, Very Large""",",5000.00
1996,Jeep,Grand Cherokee,"MUST SELL!
air, moon roof, loaded",4799.00
```

For more information see: http://en.wikipedia.org/wiki/Comma-separated_values

What does Transparency mean?

'.....an object that lets light through so that objects on the other side can be seen clearly'

The government requires that all local authorities provide details of every purchase over £500 therefore the new Intelligent Finance Forms require you to supply a description that will be published. Goods and services being paid for need to be described in a manner that avoids further questions and complies with data protection regulations.

To make this process more efficient the Intelligent Finance Forms contain a dedicated Publication description field.

Publication Description	Help

This should contain information that clearly states the business reason for the payment but does not contain any confidential information such as individual's names. There is no need to repeat the suppliers name or the amount as these are published with the description. Here are some examples:

This one isn't transparent and likely to lead to more questions:

Supplier: Shop to Drop Amount: £19,500.00 Description: Gift Vouchers

So this would be better as it is clear about the reason for purchase:

Supplier: Shop to Drop Amount: £19,500.00 Description: Gift Vouchers for 130 Long Service Staff £150 each.

Although a fuller description is needed, care must always be taken about information that breaches people's confidentiality.

This one goes too far:

Supplier: Sullivan Chambers Amount: £600 Description: Court costs re Mei Li Salmon of 23 Atkinson House re her eviction for non payment of rent.

This is inappropriate for publishing as it gives personal information about someone.

A better description might be:

Supplier: Sullivan Chambers Amount: £600 Description: Courts costs for council tenant's eviction.

If you have any concerns about what should be written speak to your manager or group finance.

Summary

Everyone who codes and/or approves transactions over £500 have a duty to explain why and what they are paying for, remembering that the public have a right to know how the Borough is spending public money.