



Professor David Rhind CBE
Chair of APPSI

The National Archives, Kew, Richmond, Surrey, TW9 4DU
Email:secretariatappsi@nationalarchives.gsi.gov.uk

Stephan Shakespeare
Chairman, Data Strategy Board
Department for Business, Innovation and Skills
1 Victoria Street
London SW1H 0ET

17 May 2013

Dear Stephan,

When we met yesterday at the UK Statistics Authority you asked me for APPSI's views on your Review, launched the previous day. The review will be perhaps the main item of business on the agenda for the next APPSI meeting on 18 June. But, as it happens, I feel confident that I can respond now on behalf of my colleagues, at least in regard your specific recommendations. My confidence arises from two sources: I have already discussed the recommendations with a few APPSI colleagues who are all encouraged by them. More fundamentally, they mirror closely a number of APPSI's key public statements since 2010, the more recent of which I have previously copied to your office. Given that, it would be somewhat churlish not to welcome them!

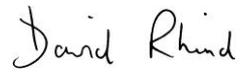
Annexed is a mapping of your recommendations to these APPSI public statements. You will see that, whilst the language used differs between us in part, the overlap in what we see as highly desirable is very considerable.

Given that, I will confine myself to enlarging on two points only. These are

1. I am confident that there is a need for a strategy of the sort you recommend. Thus far the approach has been opportunistic in developing the Open Data concept. That compares unfavourably with the way the strategy for a national physical infrastructure has been evolved. As it happens, some seven years ago I chaired the Data Forum, a group of central government departments, research councils and senior academics and we tried to create such a strategy. We made some (though not outstanding) progress but the situation now is more propitious. The new technologies available, the support of the Prime Minister and other senior figures for Open Data and even the present austerity all convince me that a realistic strategy is desirable, possible and will enable us to focus on what is important, reduce duplication and get better value for public funds. It will of course need to be accompanied by an implementation plan – as you have made clear.
2. If I have a disappointment with your recommendations, it is that address data do not make an appearance. These are, by any measure, a key component of the Core Reference Dataset you propose.

In summary, I am very confident that your recommendations will be strongly supported by APPSI and that we will offer to help with their development. I anticipate that my colleagues will collectively wish to make observations on some of your other points and expect therefore to be writing to you again after the APPSI meeting.

Yours sincerely

A handwritten signature in cursive script that reads "David Rhind".

David Rhind
APPSI Chairman

ANNEX

Comparison between Shakespeare Report on PSI and prior APPSI recommendations

Recommendation 1 *The government should produce and take forward a clear, predictable, accountable 'National Data Strategy' which encompasses PSI in its entirety.*

APPSI has been publicly urging the merits of taking a strategic approach since 2010. We however use the term 'information' rather than (raw) 'data' because there is much evidence that business needs properly cleaned and packaged 'fuel'.¹

Recommendation 2 *A National Data Strategy for publishing PSI should include a twin-track policy for data release, which recognises that the perfect should not be the enemy of the good: a simultaneous 'publish early even if imperfect' imperative AND a commitment to a 'high quality core'. This twin-track policy will maximise the benefit within practical constraints. It will reduce the excuses for poor or slow delivery; it says 'get it all out and then improve'. The high-quality core should be enshrined as National Core Reference Data. It should be defined top-down, strategically, from both a transparency and economic value point of view (and not, as now, by the departments and wider public sector bodies themselves). Within such National Core Reference Data we would also expect to find the connective tissue of place and location, the administrative building blocks of registered legal entities, the details of land and property ownership....[It] should .. (b) form the foundation for a range of other datasets, both inside and outside government, by providing points of reference and interconnection*

APPSI has long been urging the importance of identifying Core Reference Data sets by a strategic process and that these are characterised by providing a coherent and definitive framework to which other data may be fitted.

Recommendation 3 *There should be clear leadership for driving the implementation of the National Data Strategy throughout the public sector.*

APPSI's National Information Framework (NIF) paper – published in October 2012 (<http://www.nationalarchives.gov.uk/documents/nif-and-open-data.pdf>) - says, "The UK government's [White Paper] plans form valuable building blocks for the NIF. The White Paper contains a number of excellent commitments, although we do not yet see the 'glue' that will bring the initiatives together, along with an infrastructure to provide leadership. The definition of the Data Strategy Board and its scope clearly provides that body with an opportunity to become the nexus of a contemporary National Information Framework". One caveat is on the role of regulator which clearly must be independent and enable as well as constrain bad behaviour. In the IFTS we already have one of the most experienced and appropriate PSI regulatory regimes in the world.

Recommendation 4 "One would be hard-pressed to find any expert who, asked to create new structures for core reference data from scratch, would advocate the current Trading Fund model". *The overarching aim of the Trading Funds should be to deliver maximum economic value from public data assets they provide and support, by working to open up the markets their data serves. This means they should work towards opening up all raw data components, under the Open Government Licence (OGL) for use and re-use. [and four other related points]*

APPSI has made many public comments on the mismatch between Trading Funds as presently tasked and government's Open Data policies.

¹ The APPSI glossary (which is referenced in your report) defines Information as: "Interpretation and analysis of data that when presented in context represents added value, message or meaning."

Recommendation 5: *We should have a clear pragmatic policy on privacy and confidentiality that increases protections for citizens while also increasing the availability of data to external users.*

APPSI has always subscribed to the need to protect privacy whilst at the same time fostering data sharing. Your report deals with this appropriately by urging caution and control but we need practical ways of preventing 'triangulation' or 'venning' to reveal personal information.

Recommendation 6: *Building on existing activities around capability, there should be a focused programme of investment to build skill-sets in basic data science through our academic institutions*

APPSI emphasised the current shortage of skills in this area in the NIF paper by saying "There is good evidence that the skills – within governments and elsewhere – necessary to develop much greater and more effective use of Open Data, let alone build a NIF, are in short supply. We see these skills as a crucial part of the necessary infrastructure. We need to develop information management professionalism. Information management is a key resource but, unlike other key resources such as finance, information technology, human relations, property, and procurement, it does not have recognised and well-developed educational and professional underpinnings." APPSI also recently produced a draft research agenda to be addressed by universities and others and resourced by research councils.

Recommendation 7: *We should look at new ways to gather evidence of the economic and social value of opening up PSI and government data ... This evidence should be used to underpin a bold strategy of investment in an infrastructure of data*

APPSI is disappointed in the paucity of case studies in areas other than for geographic information; we discussed this lacuna with staff at ODI and will seek to identify national and international examples.

Recommendation 8: We should expect systematic and transparent use of administrative data and other types of PSI in the formulation, implementation, monitoring and adaptation of government policy and service delivery, and formally embed this in the democratic process. APPSI has not said anything very specific in public about this important point but we have been following developments such as the ONS Beyond 2011 census replacement programme, which may be based on administrative data (ONS will be presenting on this to the next APPSI meeting).

Recommendation 9: We should develop a model of a 'mixed economy' of public data so that everyone can benefit from some forms of two-way sharing between the public and the commercial sectors.

APPSI believes this is increasingly important: we identified the increasing co-mingling of public and private sector information and engagement in our NIF paper. As one indicator of the changing circumstances, we note that the CBI are trying to produce an 'industry Fol' in response to pressure for Fol to apply to private sector contractors delivering public services.