



Transparency and Open Data Policy

Change History

Version	Date	Description	Author
0.1	11/1/13	First draft	Pete Thomson, Policy Officer
0.2	23/1/13	Revised draft following comments from Anna Moore	Pete Thomson, Policy Officer
0.3	7/2/13	Revised draft following comments from Charlotte Johns	Pete Thomson, Policy Officer
0.4	15/2/13	Revised draft following comments from Glenn Wood and Martin Eades	Pete Thomson, Policy Officer
0.5	27/03/13	Revised following audit review	Anna Moore

Transparency and Open Data Policy

1. *Introduction*

- 1.1 Wolverhampton City Council is committed to engaging with local people, businesses and community organisations, being accountable to them and responsive to their needs. As part of this, the Council believes it has a duty to be transparent and share information openly, unless there are clear reasons not to do so.
- 1.2 The Council creates and collects large volumes of data in the course of its work, and aims to make the best possible use of these assets for the benefit of the city. Some of the data may be of value to others, within Wolverhampton or elsewhere - perhaps in combination with data from other sources. The Council welcomes the re-use of its information assets, and will make datasets openly available for re-use unless there are clear reasons not to do so.
- 1.3 Reasons not to publish information or make open data available will be based on the principles of the [Freedom of Information Act](#).
- 1.4 This policy document sets out the Council's principles for transparency and open data, and the roles and processes by which they will be realised. It should be read in conjunction with other related policies including the Information Governance Policy, Freedom of Information Policy, Data Protection Policy and Data Quality Policy. Transparency is intended to form an integral part of information governance within the Council.

2. *Principles*

- 2.1 The Council will comply fully with all relevant legislation, including:
 - the [Freedom of Information Act 2000](#) (including amendments made by the [Protection of Freedoms Act 2012](#));
 - the [Data Protection Act 1998](#);
 - the [Environmental Information Regulations 2004](#);
 - the [INSPIRE Regulations 2009](#).
- 2.2 The Council will also take account of relevant guidance, including:
 - the [code of recommended practice for local authorities on data transparency](#);
 - [Local Transparency - Guides to Publishing Data](#);
 - Guidance from the [Information Commissioner's Office](#), particularly that on [Publication Schemes](#) and [Freedom of Information Exemptions](#).
- 2.3 The Council will respond constructively to requests for information under the Freedom of Information Act and other similar legislation, as detailed in other policy documents. Requests for datasets, and any frequent requests for similar information, under this legislation will be

considered as evidence of demand for publication of the dataset or information.

- 2.4 The Council will pro-actively publish information and datasets where this is appropriate and:
- there is evidence of demand (through individual requests as mentioned above, or in other ways); or
 - the Council considers publication will help achieve its core purpose and strategic aims; or
 - publication of specific information or data is required under the above or any other legislation.
- 2.5 Publication will not be appropriate if it would be contrary to any legislation (e.g. the Data Protection Act), or if the material would be exempt from disclosure under the Freedom of Information Act or other applicable statutory provisions.
- 2.6 If publication would incur any appreciable cost (including staff time), the Council will seek evidence of the benefits from publication, and will consider publication inappropriate unless a sound business case is made.
- 2.7 Pro-actively published information and datasets will be included in the Council's Publication Scheme. The Council's Information Asset Register will identify which datasets have been published, and which have been judged inappropriate for publication (with an explanation as to why publication would be inappropriate). The Information Asset Register itself will be published, although it may be subject to redaction to avoid publication of inappropriate material.
- 2.8 Information and datasets will normally be published under the current version of the [Open Government Licence](#). This allows free use and re-use of the material for any purpose including commercial exploitation, but applies some conditions including acknowledging the source and avoiding misrepresentation. It also makes it clear that the information is provided "as is", without any liability for errors or omissions and without any guarantee of continuing availability.
- 2.9 Datasets will normally be published in a raw state, as produced by the Council's internal processes. They may be subject to redaction if necessary to avoid inappropriate publication (e.g. of personal data). They will not be enhanced or restructured to meet the needs of other users.
- 2.10 The quality of data will be that resulting from the Council's internal processes. This will normally be fit for the purposes for which the Council uses it. There is no guarantee that it will be fit for other purposes, and the Council will not generally undertake to improve data quality in order to make it so.
- 2.11 The Council will welcome re-use of its published information and datasets, and may wish to publicise good examples. Feedback about uses of the material, and data quality or other issues with it, will be

encouraged. As indicated above, however, this does not mean that requests for enhanced, restructured or higher quality data will necessarily be met.

2.12 This policy will be reviewed on at least an annual basis.

3. *Publication Formats and Processes*

- 3.1 All information and datasets will be published electronically on one or more appropriate websites - normally [the Council's main website](#), the [Wolverhampton in Profile](#) website, or [Wolverhampton CMIS](#). Some information may also be published in other forms.
- 3.2 Information and datasets will normally be posted directly to the appropriate website by the Council staff responsible for creating or managing the material, who will also maintain the relevant entries in the Information Asset Register.
- 3.3 Where possible, datasets will be supported with contextual information to help users understand the meaning of the data and avoid misinterpretations.
- 3.4 The Information Asset Register (possibly in redacted form) will be published, and updated at regular intervals, by the Transparency Lead Officer. The Publication Scheme will provide a central directory of the material that is published, and will be maintained by the corporate Freedom of Information function.
- 3.5 Pro-actively published information and datasets will be published as soon as possible after production. There will be an indication of the date they refer to and, if applicable, when they are expected to be updated.
- 3.6 Datasets will be published in a re-usable, machine readable format using open standards where possible. The Council will adopt the [5 star rating scheme for open linked data](#) to indicate the standard of each dataset, and will generally aim to achieve a 3 star rating.
- 3.7 Any available detailed guidance or standards for the format of particular datasets will be followed as far as practicable, to enable linking and comparison with datasets from other sources.
- 3.8 Datasets may also be published in a more person friendly readable format (e.g. PDF). Other types of information such as documents will normally be published in these formats.

4. *Roles and Responsibilities*

4.1 **All Council employees** will:

- be aware of the Council's policy on transparency;
- respond helpfully to enquiries about or requests for information and data.

4.2 **Information asset owners** will:

- know whether the information assets they are responsible for are currently published;
- if they are, ensure that updates are published at agreed intervals in agreed formats;
- if not, know whether they could be made public in response to a request, and if so respond promptly to any such request;
- maintain their entries in the Information Asset Register to agreed standards.

4.3 The **Corporate Freedom of Information function** will:

- advise on whether material is appropriate for publication, and on any need for redaction;
- maintain the Publication Scheme
- identify frequently requested information, and requests for datasets, and advise the Transparency Lead Officer of these.

4.4 The **Transparency Lead Officer** will:

- establish a plan for publication of additional information and open data, and monitor progress;
- advise on what material should be published pro-actively;
- advise on formats and schedules for publication;
- provide training on transparency issues to staff;
- arrange for the publication of the Information Asset Register;
- monitor compliance with this policy and related procedures, and report any issues to the Information Governance Board.

4.5 The **Information Governance Board** will:

- sign off this policy and subsequent reviews of it;
- sign off the plan for publication of additional information;
- receive progress reports on the plan, and on any compliance issues;
- refer issues to the Strategic Executive Board as appropriate.

5. ***Policy Review***

This policy will be reviewed at least annually or when required by changed circumstances.