



Open Government: Key Implementation Considerations

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1. INTRODUCTION

Open Government offers significant benefits and opportunities for government, business and the public including:

- making democracy stronger because when government is more open, it is more likely to be held accountable for its decisions
- giving the public a greater voice in what government does, and fostering government decisions and action that further the interests of all, not just a few
- advancing a more efficient and effective government because it is more open to public scrutiny¹
- promoting integrity in government by providing the public with the information it needs to hold government responsible for its decisions, actions and spending²
- creating economic opportunities that benefit business, government and the public

The Office of the Information and Privacy Commissioner of Ontario (IPC) is a strong supporter of Open Government and encourages institutions covered by the *Freedom of Information and Protection of Privacy Act* or the *Municipal Freedom of Information and Protection of Privacy Act* to be more open and transparent, and to engage with the public.

To help increase institutions' understanding of Open Government, the IPC published its **Open Government: Key Concepts and Benefits** paper. This paper builds on that foundation by providing institutions with an overview of important factors to consider when implementing Open Government. It can help your institution create its own implementation strategy based on its unique circumstances and strategic priorities.

2. LEARN FROM OTHERS

Open Government initiatives have been ongoing in various jurisdictions for a number of years. Understanding the trends, developments and available resources — at the international, national and local level — enables you to learn from, and build upon, the work of others.

Collaborating with other institutions can also help you understand the practical challenges of implementing Open Government and develop effective solutions. The **Open Government Partnership** is one example of how co-operation and standardization is developing globally. There are a number of pan-Canadian initiatives to guide you like the Government of Canada's

1 United States Government, Obama Administration (The White House), *The Obama Administration's Commitment to Open Government: A Status Report* (Washington, D.C.: United States Government, September 2011), 4-5, and Office of the Australian Information Commissioner (OAIC), *Guide to the Freedom of Information Act 1982* (Canberra: OAIC, November 2011), 6.

2 Helen Darbishire, World Bank Institute, *Proactive Transparency: The future of the right to information? A review of standards, challenges, and opportunities* (Washington, D.C.: World Bank Institute, March 2010), 3, 10.

strategy to harmonize Open Data activities at all levels of government by establishing common principles, standards and licensing.³

Consider creating or joining a community of practice where you can share knowledge, experiences, strategies and resources.⁴ For example, a group of Ontario municipalities, led by Guelph and Toronto, started the Open Government Community of Practice, which has grown to include government institutions from across Canada.

Facilitating co-operation and collaboration within your institution is also important as it can enhance awareness, learning and efficiencies. The City of Toronto's 2015 Open Government staff survey illustrates this point. It identified "no collaboration" as one of the barriers to openness. Survey respondents commented that there was an unwillingness of different divisions to collaborate as each had their own competing goals and timelines. In response to a survey question about what the city's next Open Government priority should be, one of the top answers was to "foster collaboration and information sharing among staff and between divisions."⁵

There are many helpful online resources and communities that can help you learn more about Open Government and what is required for its effective implementation.

3. ENSURE LEADERSHIP AND SUPPORT

Open Government requires commitment, time, resources and money. Continuing and active support of your senior decision-makers is necessary for success. Experience in other jurisdictions has shown that institutions with an Open Government champion, with a clear mandate and the authority to drive reform, are better able to promote the required cultural change than those without.⁶ For government institutions, it is important to have the support of your political leadership as well.

4. SUPPORTIVE CULTURE

Your institution's corporate culture can impact your ability to implement Open Government. Support at all levels of your institution, and a willingness to change, accept risks and adapt is vital to success. The City of Guelph noted that Open Government represents "a paradigm shift in the rules of engagement" for many institutions, and stressed the "significant cultural and process change required in order to make Open Government successful."⁷

3 Treasury Board of Canada Secretariat, *Canada's Action Plan on Open Government 2014-2016* (online) (Ottawa: Her Majesty the Queen in Right of Canada, 2014).

4 Gwanhoo Lee and Young Hoon Kwak, IBM Center for the Business of Government, *An Open Government Implementation Model: Moving to Increased Public Engagement* (Washington, D.C.: IBM Center for the Business of Government, 2011), 29.

5 Toronto City Clerk's Office, *Open Government Staff Survey* (Toronto: 2015).

6 Office of the Australian Information Commissioner (OAIC), *Open public sector information: from principles to practice* (Canberra: OAIC, February 2013), 10, 27.

7 City of Guelph and Delvinia, *Open Government Action Plan Initiative Interim Report* (Toronto: Delvinia/City of Guelph, February 27, 2014), 10.

Some in your institution may see Open Government as a great benefit, while others may see it as a risk, potentially exposing your institution to unwanted scrutiny and criticism. Common concerns include:

- loss of control over data⁸ and information⁹
- risk of revealing errors or omissions
- danger of data and information being misused or misinterpreted
- extra workload and lack of resources
- turning control of the policy agenda over to stakeholders
- decision-making being delayed or paralyzed¹⁰

These concerns can generate reluctance to actively participate in Open Government. It is important for you to identify and address apprehensions in your institution as early as possible because they can contribute to an environment that does not support your efforts.¹¹

Culture change is a significant challenge and cannot be imposed—it requires careful planning and ongoing support. Depending upon where you start, this may not be a quick or easy transition. Openness will need to be embedded into your internal business processes and performance management systems. Over time your institution’s experience can reinforce positive attitudes and facilitate change. For example, showcasing your success stories can be one effective way of changing your corporate culture because it demonstrates the benefits of your Open Government initiative.¹²

5. INTERNAL AND EXTERNAL USER ENGAGEMENT

Consider involving your users, as well as the public, in the planning, design and implementation of your Open Government program. This helps foster ongoing engagement, which is critical to the sustainability of Open Government.

Open Government is not always outward facing. While engaging the public and external users is important, you should consult with your internal users as well. Having a meaningful dialogue with all parts of your institution increases awareness and support. Also, consider how you can facilitate your institution using your own data and information to provide better programs and services.

8 Data is raw, unorganized facts and figures that need to be processed. For example, a database containing a collection of numbers.

9 Information is processed, organized data. For example, an analysis of numbers in a database that organizes that data so it is understandable and reveals its meaning and context.

10 Don Lenihan and Carolyn Bennett, *Canada 2020*, “Rebuilding Public Trust: Open Government & Open Dialogue in the Government of Canada” (online), April 28, 2015.

11 Open Knowledge Foundation, *Open Data Handbook Documentation* (Release 1.0.0) (Cambridge: Open Knowledge Foundation, November 14, 2012), 7.

12 Lee and Kwak, *An Open Government Implementation Model*, 28.

A key lesson learned from early Open Government initiatives is the importance of ensuring that the data and information you publish is relevant to your users and the public. They may lose interest if you fail to respond to their needs and input in a timely manner.¹³ Therefore, as you design your Open Government services, consider how to obtain and respond to your users' and the public's feedback.

Do not assume that people will automatically participate if you create venues for public engagement. Involve your users and the public in a variety of ways such as social media, feedback forms and surveys to determine if your program meets their needs and priorities.

6. EFFECTIVE PLANNING

Given the ongoing cost and resource requirements, careful planning is essential for effective implementation. A clear vision and plan is needed to guide your actions.

A key step is determining how to scope and prioritize your Open Government initiative according to the needs of your institution and community, and in a way that is realistic, affordable, timely and achievable. Consider aligning your Open Government objectives with your institution's existing strategic goals and priorities. Open Government programs that do not contribute to an institution's mission or mandate are unlikely to be sustainable.¹⁴

Consultation with internal and external users and the public can be very useful in the early planning stages of your Open Government initiative. The experience of other jurisdictions has shown the importance of developing your implementation plan through an open and participatory process.¹⁵ Be clear about what can and cannot be achieved with your resources and timelines. While Open Government holds tremendous potential for public engagement, government transparency and accountability, internal and external expectations need to be managed properly and realistically.¹⁶

As you increase your Open Government services, the complexity of managing them also increases. If not carefully planned and well managed, this complexity can be a major obstacle to sustainability.¹⁷ It is useful to have a defined framework with the necessary policies, processes and performance requirements clearly documented.

The type of documentation required to support your Open Government initiative will change over time. Generally, institutions start with environmental scans, business cases or other proposals to obtain approval to proceed since this type of program requires time, resources and money. It is critical to identify the specific costs and benefits for your institution, internal and external users and the public.

13 Ibid., 25.

14 Ibid., 28.

15 United Nations Department of Economic and Social Affairs (UNDESA), *Guidelines on Open Government Data for Citizen Engagement*, UN Doc ST/ESA/PAD/SER.E/177, 2013, 56.

16 Ibid., 40.

17 Lee and Kwak, *An Open Government Implementation Model*, 29.

Once approved you will need to develop an implementation plan, which may need to be evaluated and refined over time. It is beneficial to establish clear performance indicators for each defined action including specific deliverables, responsibilities and due dates. Consider making your development process transparent, allowing for public evaluation and scrutiny.¹⁸

You may find it helpful to review and adapt (with appropriate permission and attributions) the documentation prepared by other jurisdictions, particularly their Open Government frameworks and implementation plans. Many municipalities in Ontario have created extensive documentation, including the cities of **Toronto**, **Guelph**, and **Kitchener**.

7. READINESS ASSESSMENT

Implementing Open Government may not require a significant financial investment. Many institutions begin by leveraging their existing resources. However, effective planning and implementation does require a realistic assessment of your institution's capacity.

By evaluating your readiness, you can identify the strengths and weaknesses of your institution, and the gaps that need to be addressed in order to proceed. It is helpful if your goals, objectives, priorities and implementation plan are based on this assessment.

Consider your financial, human, organizational, technological and infrastructure resources — both what is currently available and what will be needed in the future. These key resources can significantly impact your institution's capacity to implement Open Government.

7.1 FINANCIAL RESOURCES

It is important for your decision-makers to understand that an Open Government initiative is not without costs. Those costs will depend upon the scope and focus of your initiative and your institution's state of readiness.

You may be able to utilize existing resources or require an investment to hire new staff, purchase or develop technology and applications, or upgrade your network infrastructure. In addition, converting data into reusable formats can be time-consuming and, therefore, costly. This can be particularly true if you use proprietary software.¹⁹

When planning how to proceed, it is important to assess your available financial resources and those required over the long term. Consider the technical implementation and operational costs, as well as training and other ongoing costs.²⁰

18 UNDESA, *Citizen Engagement*, 56, 66-67.

19 Barbara Ubaldi, Organisation for Economic Co-operation and Development, "Open Government Data: Towards Empirical Analysis of Open Government Data Initiatives," *OECD Working Papers on Public Governance*, no. 22 (2013), 32-33, doi:10.1787/5k46bj4f03s7-en.

20 UNDESA, *Citizen Engagement*, 54.

7.2 TECHNOLOGY AND INFRASTRUCTURE RESOURCES

A key part of an Open Government readiness assessment is evaluating your technological infrastructure including the information technology (IT) and communications systems you currently use for data and information collection, processing, retention and dissemination.

You may face costly technological challenges if your existing practices for record keeping, information governance and publication are not already designed for openness.²¹ Inconsistencies in file formats, limited or no inter-operability between current and legacy IT systems, lack of network connectivity or insufficient bandwidth, and inadequate integration between publication options and public engagement tools can prove to be significant roadblocks.²²

As you plan your Open Government activities, consider if your IT, **information management** (IM) and publication processes limit external and internal users' ability to access and use data and information.²³ Also, consider whether your IT resources support public engagement in a way that is accessible, easy to use, and accommodates different levels of knowledge and diverse interests.

7.3 HUMAN AND ORGANIZATIONAL RESOURCES

Human resource constraints can also have an impact. Some institutions may lack staff with relevant experience and knowledge to readily implement Open Government. If it is not possible for you to create a new unit or hire new staff, the responsibility will need to be assumed by one or more of your existing program areas.

When estimating the human resources required, consider both the short-term (what is needed to launch your initiative) and the long-term (what is needed to sustain it). For example, social media-based public engagement requires dedicated personnel to ensure continuous monitoring and maintenance. This may result in a substantial investment in terms of human resources.²⁴ You may also need to allocate sufficient resources for training, as well as for operational support over the lifetime of your program.

8. DEFINE ROLES AND RESPONSIBILITIES

Given the complexity and expansive nature of Open Government, it is beneficial to have an interdisciplinary approach with engagement from across your institution. The active involvement of the parties responsible for the relevant data and information, stakeholder engagement and communications, IM and IT, as well as your legal and privacy experts is critical. Your entire institution will need to be aware of, engaged with, and committed to Open Government for it to have traction and longevity.

21 OAIC, *Open public sector information*, 1-2.

22 Lee and Kwak, *An Open Government Implementation Model*, 24-26.

23 OAIC, *Open public sector information*, 16.

24 Lee and Kwak, *An Open Government Implementation Model*, 27-28.

Once relevant parties are identified, define the roles, responsibilities and accountability for all areas of your institution and partners involved. Having an effective governance structure and related processes can help enable continuous improvement and innovation. For example, a committee with representatives from across your institution may be a useful governance model. Consider:

- defining the required approvals for each phase of your initiative — from planning, to implementation, to ongoing maintenance including monitoring and evaluating
- developing a formal process for the identification, prioritization, publication and monitoring of data and information release, as well as for handling public feedback²⁵

9. PHASED APPROACH

Increasingly institutions are under pressure to implement some kind of Open Government program in a short period of time with limited budgets and resources. As a result, they may be tempted to implement more services than they can support. This can challenge resources, budget, technology, corporate culture and adoption by internal and external users. By stretching themselves too thin, institutions may compromise the success of their efforts.

Consider if your Open Government program would be more successful if introduced through small, achievable components, rather than as a single undertaking. By focusing on one aspect at a time, you can effectively develop infrastructure and capabilities, without overburdening your existing resources.²⁶ You can also build success and credibility for your initiative.

A phased approach can minimize the risk of failure by enabling you to conduct pilot projects to demonstrate a concept's merit. When implementing one aspect of Open Government, you can experiment with a small-scale pilot related to another component. By doing so, your transition from one phase to the next may be facilitated.²⁷

10. IDENTIFY AND ADDRESS LEGAL REQUIREMENTS

It is important to understand the legislative and other requirements governing freedom of information, privacy protection, intellectual property and other rights and restrictions related to your data and information. Your implementation plan should identify all such requirements so you can effectively design your Open Government services to meet these overarching obligations.

²⁵ *Ibid.*, 14, 27-30.

²⁶ *Ibid.*, 9-10, 27.

²⁷ *Ibid.*, 27.

11. REVIEW INTERNAL POLICIES AND PROCESSES

Openness needs to be embedded into your policies, business processes and performance management systems in order to impact your corporate culture. A review of your policies and practices, decision-making processes, training programs and governance mechanisms can help you ensure they support your Open Government goals. You may need to remove impediments, clarify guidance, and define and document new processes, roles and responsibilities.²⁸

12. ALIGN INFORMATION MANAGEMENT

Open Government is predicated on being able to find and publish high-quality, authoritative and relevant data and information. Shortcomings in IM policies, standards and practices can create significant challenges.²⁹ For example, poor IM practices can increase the cost and effort required for your institution to make its data and information available in accessible formats.³⁰

Consider reviewing your IM policies and practices early in your planning process to determine if they create any barriers to Open Government and, if so, develop a strategy to address them. An accurate, comprehensive and up-to-date inventory of your data and information assets is vital for identifying appropriate records for release and defining your publication priorities.³¹

Openness needs to be considered throughout the lifecycle of your records so they can be created or collected, retained, retrieved, redacted if necessary, and published in a way that supports your initiative. You should also ensure your staff understand the important alignment between effective IM and Open Government.

13. TRAINING AND AWARENESS

Training and awareness are important elements for success. Consider how best to familiarize staff at all levels of your institution with your Open Government priorities, services, processes, technologies and IM practices. Focussed training for specific areas may also be required. Staff turnover, as well as changes to your institution's Open Government program, will require a long-term commitment to training.

The results of the City of Toronto's 2015 staff survey about Open Government illustrate this. The City of Toronto was an early adopter of Open Government, yet the survey showed that almost half the staff surveyed were not familiar with it. The survey asked what the City's next Open Government priority should be, and the top answers included educating all staff, the public and members of council on Open Government.

28 Ibid., 24-26, 28.

29 OAIC, *Open public sector information*, 11.

30 Ubaldi, "Open Government Data," 31.

31 OAIC, *Open public sector information*, 11, 15.

14. MONITOR AND EVALUATE PROGRESS

For your Open Government initiative to be sustainable, define how you will monitor, evaluate and refresh your Open Government services to ensure they continue to have value and adapt to changing priorities and emerging technology and trends.

Consider if you should develop an ongoing process for determining if your institution's decisions and actions support your program; advance your defined goals and objectives; and meet the needs and priorities of your internal and external users and the public. This is particularly important if your institution follows an incremental approach and slowly expands your offerings and services. You may need to adjust what and how you monitor and evaluate as your initiative evolves.

Your evaluation should measure Open Government's tangible and intangible outcomes.³² Initially you may want to start with quantitative metrics that objectively measure process performance. For example, you could measure the number of datasets published or downloaded; number of communication channels; time duration of web pages viewed; and frequency of data updates.

As time progresses, you could expand your evaluation criteria and also measure outcomes and impacts, such as time and cost savings. For example, you could measure the number of visitors or followers on social media; number of messages posted by the public; number of ideas submitted by the public; and the frequency of voting and polling.

When your program matures, you may want to incorporate qualitative metrics to measure intangible outcomes such as strategic impact, public-employee satisfaction and benefits to the public. Such metrics could include the number of inter-institution collaborations; number of public-private sector collaborations; number of public-government collaborations; increase in the number of users; shared datasets and channels; and number of mobile users/platforms/applications/services developed.³³

To ensure ongoing support from senior decision-makers, you will likely need to demonstrate that your institution's continued investment is warranted. Appropriate performance measures can help you do that.

15. PUBLICLY REPORT ON PROGRESS

Publicly reporting on your institution's progress, and involving the public and your users in that assessment can enhance openness and accountability. Being transparent and learning from experience and user feedback enables you to move forward in a more informed way.

Many jurisdictions are publicly reporting on their progress, including some institutions in Ontario. For example, the City of Kitchener published its **four-year plan** to further its efforts to be more open and accountable to citizens, and is following up with **progress updates**. The City

³² Lee and Kwak, *An Open Government Implementation Model*, 14.

³³ *Ibid.*, 28.

of Guelph presented a **progress report** to its governance committee that outlined progress to date and plans for upcoming years. The City of Toronto also published its **progress report** to showcase some of its Open Government initiatives and highlight future endeavours.

16. CONCLUSION

Implementing Open Government may be a challenging undertaking as it will take time, resources and commitment on the part of your institution. We hope that by outlining key implementation considerations, this paper can help you plan your Open Government initiative. Start where you are and work incrementally towards your goals and priorities.

Key factors for success include:

- recognizing that Open Government is an ongoing program, not a short-term project
- making sure you have the leadership, commitment, governance and resources necessary to sustain your program over time
- defining the scope and deliverables in a way that is realistic and appropriate for your institution and users
- engaging your internal and external users and the public as you plan, implement and evaluate your activities and services



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Information and Privacy Commissioner of Ontario
2 Bloor Street East, Suite 1400
Toronto, Ontario
Canada M4W 1A8

Web site: www.ipc.on.ca
Telephone: 416-326-3333
Email: info@ipc.on.ca

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