

Understanding the value of public sector information in Australia, Issues Paper 2: Public consultation

The National Archives of Australia (the Archives) appreciates the exploratory nature and the complexities involved in developing a methodology for valuing public sector information.

The Consultation Paper has significant relevance to the Archives legislative responsibility to oversee Commonwealth recordkeeping by determining standards, providing advice and guidance to agencies and imposing records management obligations.

In carrying out this responsibility, the Archives has been pro-active in addressing the challenges of managing digital information in Government. As you will be aware, the Archives has primary responsibility for the implementation phase of the Government's Digital Transition Policy, and has a role and strong interest in matters relating to information management.

While the Archives interest in information management is aligned to our legislative role in overseeing record management in the Commonwealth Government, we recognise that agency compliance with sound information management practices is the best way to ensure that information is more readily available for use and re-use.

Before addressing the questions raised in the Issues paper¹, the Archives wishes to make comments which relate more generally to the terminology used and the potential for confusion about roles and responsibilities, and the need to continue the collaboration between our respective organisations when approaching agencies.

¹ Office of the Australian Information Commissioner, *Understanding the value of public sector information in Australia*, Issues Paper 2 (2011).

Terminology

The paper² blurs the meaning between information / Public Sector Information (PSI), valuing PSI / valuing the publication of PSI.

In particular, the Archives is concerned at the narrow use of the term ‘information management’. The proposed survey purports to gather:

“consistent information across government on information management practices.”³

Information management encompasses all the systems, formats and processes used within an organisation for the creation, management, storage, disposal and use of information. Information management is a broad concept, which has its own discipline and is underpinned by national and international standards. It should not be narrowly applied.

The survey questions proposed generally relate to the release of information, although some are wider. The Archives is concerned that it may confuse agencies about what is encompassed by ‘information management’, and therefore about roles and responsibilities. Agencies have expressed their confusion to the Archives in the recent past about our organisations respective roles.

It is noted that the proposed use of the information collected in the survey is, not only to develop a methodology for valuing PSI, but also for use in discussions with the Information Advisory Council in developing advice to Government on national information policy. As noted above, information management is a broad subject area which covers a range of agencies’ responsibilities. The survey in itself would appear to be too narrow for this wider use. If the proposed national information policy is to be concerned only with the publication of PSI, the terminology could be misleading. If it is

² Office of the Australian Information Commissioner, *Understanding the value of public sector information in Australia*, Issues Paper 2 (2011).

³ Office of the Australian Information Commissioner, *Understanding the value of public sector information in Australia*, Issues Paper 2 (2011) 2.

intended to be wider, then more information than that collected in the survey would be needed to inform the Information Advisory Council members.

Opportunities for collaboration

The Archives periodically surveys agencies on their information management practices. The last survey was in 2010 and another will be conducted in 2013. The 2013 survey will be used to compile the report to the Minister on agencies transition to digital information management required by the Government's Digital Transition Policy. The reporting responsibility rests principally with the Archives in consultation with your Office and the Australian Government Information Management Organisation.

The Archives would be very happy to share information gathered from the survey with your Office.

In addition, for three years agencies are required by the Digital Transition Policy to complete a Check-up 2.0 self-assessment of their records management capability. These results are gathered by the Archives for inclusion in the report to the Minister.

Consultation about such agency-wide surveys would help to maximise opportunities for cooperative approaches and reduce the risk of overloading agencies with demands for information about their information management practices.

Question 1: The ideas presented in the OAIC Issues paper: does it propose a workable approach for mapping the PSI landscape and developing a methodology for valuing PSI?

In general, the paper refers to data, data sets and information, rather than records which are the predominant entities published by the Archives. The paper contrasts value in terms of economic outcomes with cultural or social value, but does not address the evidential value of records. Examples include:

- for legal proceedings;
- to establish entitlement to a benefit or award;
- to prove that an individual is a legal resident of the country so that they can obtain a passport; or
- to help settle an historical question of the origin of a government policy.

The major issues that the Archives would like to raise are already mentioned in our submission. The foremost of these is that material from the Archives' and material produced by the Archives largely has a social or cultural or evidential value rather than an economic value. As the paper states:

“the economic value of some types such as geospatial information can be assessed quite readily. It is less appropriate to attempt to attach a dollar-value to cultural collections”⁴

The Archives would support this, emphasising that the material released by the Archives, although it may be used in commercial products, for example, school text books and documentaries, does not in itself generate a significant commercial value in the way that statistical information, spatial data and hydrological data is of immediate commercial use in specific

⁴ Office of the Australian Information Commissioner, *Understanding the value of public sector information in Australia*, Issues Paper 2 (2011) 9.

sectors. Therefore, we would assert that for the material published by the Archives, the economic value arising from its use is insignificant to the point of being unmeasurable.

Given that the value of material published by the Archives is social or cultural, or evidential, we would emphasise the point made in the paper that:

“the social value of PSI is not easily quantifiable”⁵

When the paper states:

“some significant initiatives have been undertaken in Australia to publish the holdings of cultural institutions and it would be desirable to consider their impact”⁶

The Archives would assert that the social and cultural impact of publishing of material by the Archives is not quantifiable. There are limitations to any methodology aimed at gauging the ‘impact’ of publication. Our audience for published material is extremely diverse embracing family historians, professional historians and journalists. It would be challenging to sectorise our audience to gauge the impact on a particular sector, let alone to attempt to gauge the impact on something as diffuse as the Australian public.

The Archives also cautions that the project approach as suggested in the paper will be difficult to measure and document the impact:

“...this social value is difficult to quantify and must be assessed for each project individually”⁷

⁵ Office of the Australian Information Commissioner, *Understanding the value of public sector information in Australia*, Issues Paper 2 (2011) 10.

⁶ Office of the Australian Information Commissioner, *Understanding the value of public sector information in Australia*, Issues Paper 2 (2011) 9.

⁷ Office of the Australian Information Commissioner, *Understanding the value of public sector information in Australia*, Issues Paper 2 (2011) 10.

Allowing for the submission of case studies demonstrating the impact of a project will be limited. The Archives could report on public engagement with a project such as [Mapping our Anzacs](#), for example, by reporting on the quantity of tribute material added to the site or the number of online visits, but this does not demonstrate an impact.

Essentially for any project, or release of information, the impact could only be gauged by feedback from users and that will be anecdotal, and only represent a sample of the users of the information (those who are willing to provide feedback).

The Archives would support the conclusion:

“it is simpler and in some contexts, more appropriate to quantify the output of an initiative than it is to quantify the impact”⁸

This would apply to all the publication of material from the Archives. It would not be possible to quantify the impact, and would be a challenge to gauge its impact.

In terms of publication and use of the material, the Archives would have to fall back on reporting aspects such as:

- The quantity of material available on the website;
- The accessibility of its format;
- The licence conditions under which it is released;
- The visits by the public to sections of the website; and
- The level of engagement by the public in terms of material added to projects.

⁸ Office of the Australian Information Commissioner, *Understanding the value of public sector information in Australia*, Issues Paper 2 (2011) 12.

Overall it would be difficult for the Archives to provide data on the impact of the release of information beyond the sort of information sought in the initial survey.

Question 2: The draft survey form in the Appendix to the paper: is the survey form appropriately framed to address the right issues and gather useful information?

The survey is expressed exclusively in terms of 'data' and 'information', there is no recognition that the Archives make available records which have evidential value. Essentially, the Archives currently publishes static reproductions of paper records, not datasets that can be reformatted, or electronically manipulated.

There is a need in the survey and in the development of the framework to identify the cost of supporting the move to more open access. This will enable an assessment of what the costs are and measure those against the tangible and intangible benefits of open PSI.

This data will help Australia to measure the cost of its framework (not just the benefits derived) against the international community and benchmark its performance.

Question 3: The literature survey in Part 4 of the paper: does the survey adequately cover the field, and are there gaps or limitations in the existing research?

The Archives has no comment on whether the survey adequately covers the field and if there are gaps in the existing research.