



## VICTORIAN SPATIAL COUNCIL

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Office of the Australian Information Commissioner Issues Paper  
GPO Box 2999  
Canberra ACT 2601

Dear Sir/Madam

### **SUBMISSION IN RESPONSE TO ISSUES PAPER NO.1 – TOWARDS AN AUSTRALIAN GOVERNMENT INFORMATION POLICY**

The Victorian Spatial Council (VSC) is pleased to make the following submission to the *Towards an Australian Government Information Policy Issues Paper*.

The VSC is Victoria's peak body for spatial information policy and management; it also facilitates opportunities for a strategic focus on its development through greater partnership building, collaboration, cooperation and education.

Its members come from all sectors of government, the private sector, the professions and academia.

The Council has a particular interest in providing an environment in which spatial information is available and able to be used.

It also has a focus on developing frameworks, particularly in developing policy for spatial information management and availability.

It has been estimated that more than 80% of information used by government has spatial characteristics – meaning that it can be related to a geographic location.

In recent years this location based information has been increasingly recognised as a key resource for government.

The popularity of the spatial@gov conferences run by the Australian Government and its partners has provided demonstrated the demand to know more about how spatial information can be accessed and used, as well as an opportunity to showcase the application of that information to a wide variety of government services.

One of the key characteristics of the digitisation of information and the capacity to deliver it on-line via the internet, is that data from many sources can be more readily combined to support analysis and decision making.

The Victorian Spatial Council recognises that the value of spatial information lies in its being used to deliver products and services, and address environmental, social and economic goals. Therefore it must not only be accessible, but also appropriately managed so that its value is enhanced.

The VSC is developing information policy for all sectors of the spatial information community in Victoria, including government, to realise these goals.

Its approach is to develop a framework that allows for a distributed network of data custodians and managers to act autonomously according to consistent principles and requirements while retaining full control of their respective information resources, and responding to their own particular circumstances.

The Council is addressing the same issues in developing a coherent and effective information policy that the Commissioner has identified in the Issues Paper, ie:

- Ensuring a coordinated approach to government information management
- Ensuring smooth interaction between key agencies and committees
- Bringing agencies along with new information policy developments and making sure they are well equipped to implement change
- Keeping pace with international developments and innovations on public sector information and government information management
- Driving the momentum on open and reuseable public sector information

The Council supports the Issues Paper's aim to provide a principles-based approach to information management.

We support the remarks in the Paper that principles embody the values and goals that drive information policy, and that they can be flexible and adjusted to the activities and responsibilities of agencies.

In regard to the 10 principles set out in the Issues Paper, the Council has the following responses.

Further context for these responses is contained in the Council's Spatial Information Management Framework for Victoria, which can be accessed at

<http://victorianspatialcouncil.org/page/resources/spatial-information-management-framework>.

#### *1. Open access to information – a default position*

Supported, with qualifications

If data is to be provided at no cost, Government needs to clearly signal the value placed on it by appropriately funding its ongoing management and provision. Past experience in jurisdictions providing spatial information at no cost has shown that quality declines as the supplier agencies progressively shift funding and resources away from a function that appears to be of little or no value.

The Council has noted also that, where agencies have adopted full or partial cost recovery as part of their management approach, they have also developed a stronger customer and results focus to their activities, to the benefit of all concerned.

The loss of the discipline provided by a cost recovery approach (whether full or partial) can also result in data fragmentation and duplication. The prime example of where this has occurred is the United States, which provides Government data at no cost, but has not been able to develop a national address product because agencies simply dump uncoordinated and incompatible data onto the open market. The result has been that the private sector combines disparate components together to produce competing and conflicting national address datasets. The public and industry then purchase these data products from the providers, because the cost of processing the 'free' Government data is too great.

An added disadvantage is that these competing products are incompatible, resulting in conflicts and inconsistencies when information is exchanged.

The net result is that the data is not free, and the value of the information is reduced.

The Council also believes there should be a wide definition of 'openness' or 'accessibility'. Thus it should also cover such things as:

- Knowing what data exists (awareness)
- Being able to find ('discover') it
- Identifying who is responsible for it
- Data being available
- Being able to assess its fitness for purpose, share it, and choose from multiple ways of accessing and distributing it (including technical solutions that encourage accessibility).

This wider approach has been adopted as the policy position for spatial information in Victoria.

The principle is that information must be available, accessible, accurate, complete, current and consistent, and users must know it exists.

In particular, the fundamental requirement for core spatial information, which is known as 'Framework information', is that it be accessible and available to all members of the community: barriers such the extent of data coverage should not limit access to it (for example, data coverage being limited to major population centres).

## *2. Effective information governance*

Supported

## *3. Robust information asset management frameworks*

Supported

Victoria has already such an approach for spatial information through its Spatial Information Management Framework.

The VSC acknowledges the Office of the Information Commissioner's focus on principles that encourage public sector information to be made available to the public and supports this principle that an information management framework needs to underpin them.

## *4. Findable information*

Supported

The Council believes AGLS is necessary (to support integration and interoperability with the Australian Government and others) but only part of the answer. There are other, specialised metadata domains for many areas. For example, metadata records for spatial information are created under the ISO 19115 standard, which has a link to AGLS.

## *5. Sound decision making processes*

Supported

Victoria's Spatial Information Management Framework sets out the requirements for addressing privacy related matters.

There should also be recognition that some sensitive data may not be openly accessible. While the existence of data should be published, custodians must be allowed to decide who has access in particular circumstances.

As part of their roles and responsibilities, custodians of the information specify any access restrictions that apply, for example due to the sensitivity of a location's biodiversity or cultural heritage. Custodians may determine that access is only through direct negotiation between themselves and the interested user.

Access requirements are set out in the metadata that is published in directories for spatial information.

#### *6. Transparent complaints processes*

Supported

#### *7. Open and accessible formats online*

Supported

#### *8. Appropriate charging for access*

Supported, with some qualifications

Discussions regarding pricing of information seem to be based on the notion that information products have high fixed costs and low marginal costs. There is significant emphasis on the cost of supplying information to additional users being low once it has been collected. This is more likely to be true for material such as reports.

In the case of spatial information however, there are often significant costs to maintain it and keep it up to date. Data such as property, address, and transport are highly dynamic and require constant updating as new subdivisions, addresses and roads are created.

While the management of this information is a State responsibility, these matters would impact on the Australian Government's access to that information.

There are also substantial costs in developing and maintaining the high availability discovery and access infrastructure jurisdictions have developed to bring the information to users, and which must deal with large, resource intensive datasets and services.

The Council does argue however, that any revenue obtained from distributing spatial information must be used to develop it and maintain the quality standards required by users.

#### *9. Clear reuse rights*

The VSC supports the principle that value adding to government data be facilitated under fit for purpose terms and conditions, whether under open access licences or other reseller licence.

#### *10. Engaging the community*

Supported

The ten principles set out in the Paper 'focus [on] the publication of public sector information by government agencies'.

As demonstrated by our remarks above, the Victorian Spatial Council also believes, particularly in relation to spatial information, that principles/practices around management and sharing the information should be a key part of an Australian Government Information Policy.

While principles 3, 4 and 7 contain elements of an information management approach, there are a number of key aspects that should be further emphasised.

One of these is the capacity to share and exchange information between Government agencies.

This is in line with the reasons for the Office's establishment to 'provide advice to government on policy and practice on how government collects, stores, manages, uses and discloses information'.

Sharing should be facilitated not only via consistent management practices, but also infrastructure that supports publishing data, and enabling its discovery and access to it.

The VSC welcomes the Australian Government's focus on information management principles.

We would also strongly encourage it to work with the jurisdiction governments to create a nationally consistent framework.

In relation to spatial information, the jurisdictions are the primary source for much of the data that is produced and used; therefore their engagement will be fundamental to ensuring such information is available to all sectors at a national level as well as within State and Local Government boundaries.

To that end, the Council would welcome the opportunity to discuss our approach further to enable a truly national approach to information management.

Yours faithfully

A handwritten signature in cursive script, reading "Olaf Hedberg".

**Olaf Hedberg, AM**  
**Independent Chair**