



Place Matters - The Location Strategy for the United Kingdom

Comments by the Association of Geographic Information (AGI)

Summary

AGI welcomes the publication of the UK Location Strategy (UKLS) and believes the Strategy has the potential to deliver tremendous benefits to the public sector, private sector and the citizen. We recognise that implementation of the UKLS is now a challenge for all stakeholders.

AGI believes that the implementation of the Strategy is the most critical future aspect and hopes that the activities of the Location Council and its supporting bodies will be effective in this. AGI is committed to contributing to the process, and wishes to provide its support, expertise and input when and wherever possible. This can include, for example, a national discovery metadata service and formal standards, where we have specific expertise and experience, and stakeholder engagement and benefits realisation, through access to our diverse membership.

AGI has been very pleased to have contributed to the work of the GI Panel and the significance of the Strategy is recognised widely within the AGI community. The AGI, as a cross sectoral body, with membership from all areas of GI interests, would like to see the engagement of all these areas, including not only public sector bodies, but also the private sector, academia and citizens as the Strategy is implemented.

1.0 Introduction

The Association for Geographic Information (AGI) is the umbrella organisation for those with an interest in geographic information (GI). Membership comprises both individuals and organisations, including government departments and agencies, local authorities, other national organisations, educational institutions, utilities, commercial software companies and data suppliers. The mission of the AGI is **to maximise the use of GI for the benefit of the citizen, commerce and good governance**. AGI has sought a UK geographic information strategy for many years and believes the Location Strategy signifies many achievements and can take the exploitation of GI and the maximisation of its use and benefit in the right direction.

Upon publication of the UK Location Strategy (UKLS) by Communities and Local Government (CLG) following the work of the GI Panel (GIP), Defra, the appointed UKLS lead agency requested comments on the document. AGI is pleased to take this opportunity to provide feedback and gratefully acknowledges contributions made by individual AGI members and AGI groups including the AGI Standards Committee, the INSPIRE Action Working Group and the AGI System & Service Suppliers SIG.

2.0 General comments on the UKLS

- 2.1 The Strategy aims to be of benefit to public, private and other sectors through a shared and integrated framework. AGI welcomes this initiative and it has been recognised that the AGI, as part of the Locational User Group (LUG para 63.2) will be able to provide a platform to and from its private and public sector members. As the Strategy is a governmental one, the role of the commercial sector e.g. software vendors, systems integrators, data suppliers and consultants will be an important one in the delivery of the required systems and services.
- 2.2 It is not entirely clear whether this is a Strategy for the public sector or for the wider UK economy. The title suggests it is inclusive of all sectors, including the private, voluntary



and academic communities. However, it states (para 11) “It will be a cooperative effort owned by central, local and devolved government ...”. If it is in fact a *public sector strategy that will also impact other parts of the economy*, then it would help if this were stated explicitly.

- 2.3 In particular, the commercial software vendors and professional services companies – many of them UK based – have a vital role to play in implementing INSPIRE and the UKLS. This ranges from cross-departmental and cross-agency real time ‘mash-ups’ to integration of geographic information into the fabric of the IT infrastructure of the largest organisations.
- 2.4 AGI is additionally concerned at the limited scope of the UKLS when compared to other nations. Geoconnections in Canada is an SDI which, for example, has a very broad stakeholder model.
- 2.5 The AGI is concerned that the UKLS actions are expressed in the form “should do” rather more than “will do” and has an absence of timescales.
- 2.6 The Digital National Framework (DNF) has been cited as an ‘industry standard’ within the Appendix 6. Whilst AGI has been a supporter of the principles of the DNF initiative, the Framework itself is not recognised by any de jure standards body, nor is it a de-facto standard either. Significantly, whilst the use of Ordnance Survey Topographic Identifiers (TOIDs) has occurred in initiatives such as ATLANTIS, the use of TOID associated attribute and co-ordinate information is restricted to OS MasterMap licence holders. The ability to re-use these identifiers (and their locational centroids or extents) in a manner which de-couples them from the Ordnance Survey data itself would be of significant benefit in GB at least. AGI would hope as part of the review of Core Reference Geographies (paras 38-42) that the use of such identifiers e.g. postcodes (PAF), household addresses (NLPG, OS MM AddressLayer, OSNI Pointer) will be reviewed en bloc in support of the Power of Information principles (para 46). This will potentially also reduce criticism (whether perceived or real) in licensing and re-use/ fair competition.
- 2.7 The Strategy mentions the creation of technical infrastructure and approaches for all public bodies to offer data for re-use. AGI believes it is sensible to look at the internet and Web 2.0 methodologies to distribute data to consumers, be they private citizens, academia, voluntary sector, commercial organisations or public agencies. This is illustrated succinctly in the ‘Underpinning Innovation’ sidebar (page 17). The creation of any infrastructure should aim to be scalable, deliverable and capable of evolution within the short term. The infrastructure should also look to leverage existing data and technology deployments and not just those which are explicitly ‘GIS’ implementations e.g. local planning or land charges systems, electoral registration data. This is pertinent to the discovery and re-use of data but does require consideration of quality assurance of the data and its appropriateness for use and any consequences for misapplication e.g. should a dataset be used to ascertain where pipelines should be located; where radon gas concentrations occur; the extents of flood plains and so on.
- 2.8 AGI welcomes the Strategy’s recognition of the need to educate and increase geographic information knowledge and skills. AGI has developed, with RGS-IBG, a Chartered Professional Development (CPD) scheme and has also worked with the UK and European academic sectors to support tertiary and professional development (para 28.4). We would see the AGI/RGS CPD capability as a component of any initial skills initiative and would welcome its inclusion. We would also support the engagement of the UK University and research sectors especially as commercial AGI members comment that the quality of current entrants into our sector could be enhanced.
- 2.9 AGI looks forward to working within the Strategy’s organisational structure as part of the Location User Group (LUG); additionally the AGI would be extremely willing to support

the Data & Standards Group and the Location Council in terms of membership. We very much welcome the publication of the implementation and delivery plan for the initial 30 months and for the subsequent period thereafter.

3.0 INSPIRE and the UKLS

- 3.1 AGI believes that it is the spirit and practical application of INSPIRE principles that are most important rather than the name, the letter of the law, or even the immediate environmental benefits. UKLS aspires to apply all the INSPIRE principles with strong cross departmental leadership and a willingness, we hope, to look again at the current obstacles to data sharing.
- 3.2 INSPIRE was originally driven by environmental considerations. AGI wishes to stress the importance of the subsequent development of INSPIRE and the UKLS embracing infrastructure issues across all GI sectors – terrestrial and marine. Indeed, the UKLS will need to go beyond INSPIRE to be fully effective.
- 3.3 Whilst INSPIRE themes cut across the land and the sea, the UKLS appears overly “land centric” in its approach. There is a risk that the needs of coastal and offshore data users may be overlooked unless a more balanced approach is made. UKLS has been published at a time when new UK-wide marine legislation is striving for greater effectiveness, efficiencies and accountability in respect of the use and monitoring of UK marine space. The INSPIRE Directive is itself driven by the need for UK to meet requirements under other EU Directives (e.g. Habitats Directive, Marine Strategy Directive). AGI suggests that the Location Council has a role in ensuring that the linkages between emerging legislation and the UKLS are identified and fully understood.
- 3.4 AGI understands the philosophy of leaving the costs of INSPIRE implementation to each data provider but believes there is widespread uncertainty about exactly which datasets are going to be affected and in what timescale. This is particularly true of local government but also applies to many central government agencies and other public sector bodies. The Location Council must entrust Defra and its executive committees with resolving the exact scope of INSPIRE very quickly. This should include concrete responsibilities for metadata, datasets and associated network services. Mere encouragement of co-operation is not likely to achieve much in the current economic climate.
- 3.5 AGI welcomes the aspirations to better data sharing but, having just seen the first draft of the INSPIRE Implementing Rules (IR) on this topic AGI remains to be convinced that INSPIRE itself will lead to any improvements within the UK in a satisfactory timescale. Data sharing is the major goal of an SDI and requires a sustainable effort over many years with strong leadership. The will to do this has often been lacking in government and we would like to see the Location Council concentrate on this issue from the start.
- 3.6 Key to the implementation of INSPIRE and UKLS will be the overall architecture of a UK SDI. We would like to see an open development process – akin to that used to develop INSPIRE IRs and we would like to see a completely open debate about the conflicts between licensors and licencees of PSI that, unresolved, will impact on the effectiveness of INSPIRE and the UKLS.
- 3.7 INSPIRE has a clear timetable for implementation laid out in ‘Road Maps’ which, even if they are not achieved to the letter, leave no doubt of the intentions of the Directive. AGI would like to see a similar timescale for implementation of the UKLS and suggest that setting such a ‘Road Map’ should be an early task for the Location Council.



- 3.8 AGI is very interested in the ‘development of a demonstrator to facilitate the implementation of INSPIRE’. AGI would like to see this fleshed out very quickly – and openly.

4.0 Standards and the UKLS

- 4.1 Following from INSPIRE, ISO Standards supplemented by Open Geospatial Consortium (OGC) Standards will form the basis for most of the standards required for locational referencing, data content, data access and services. However, profiles or interpretations of these formal Standards will be required at the UK and possibly, devolved and local government levels. AGI believes there is value in developing some of the profiles as British Standards which should be seen as giving them more authority and some degree of neutrality. This can avoid the need for secondary legislation where it would be technical in nature. BS 7666 Part 1 (street gazetteers) is an example of a British Standard used in such a way.
- 4.2 The work required to produce a coherent body of formal Standards meeting specific UK needs should not be underestimated. Two examples already exist (i) BS 7666 Spatial datasets for geographical referencing which uses the principles set out in ISO 19112 Geographic information – Spatial referencing by geographic identifiers and (ii) UK GEMINI which is based on ISO 19115 Geographic information – Metadata and is currently being revised to meet the INSPIRE Implementing Rules. Many others will have to be developed and maintained.
- 4.3 The development of new formal Standards or profiles of existing Standards should be a consensus process involving all stakeholders, i.e. Standards should not just be imposed. Although this takes time and uses resources up-front, the experience of the AGI Standards Committee is that this produces better results and greater buy-in from the users of the Standard and hence, lowers costs ultimately. It is particularly important to involve the software vendors to ensure that the Standards or profiles can be implemented and that they are available as soon as possible after formal publication.
- 4.4 The UKLS proposes that the Location Data and Interoperability Board will oversee UK data and interoperability Standards, and will have representatives from all appropriate sectors. These representatives must include those with experience of developing and implementing formal Standards. The Board should have a commissioning rather than a delivery role in formal Standards creation.
- 4.5 The formal de jure Standards will need to be supplemented by nationally accepted and definitive code lists e.g. for administrative areas (for example, the exercise that ONS are undertaking currently). Other lists may also be needed for geographical names and certain parameters e.g. relating to coordinate referencing systems. These will need to be supported through registry services.
- 4.6 Formal Standards are established for common and repeated use to achieve the optimum degree of order in a given context. This order can only be obtained if there is conformance to these Standards. Just creating Standards does not deliver conformance - they must be backed by a conformance process involving testing, preferably independent, and some form of certification. This applies not only to data but also to software applications and tools.
- 4.7 The development of conforming data and services will be greatly promoted and assisted by adequate guidance for each formal Standard such as those produced for BS 7666 and UK GEMINI (both available and downloadable free of charge from the AGI and gateway websites respectively), as well as on-line support.



5.0 The role and position of the AGI in light of the operational changes stated in the UKLS (Appendix 3):

- 5.1 **Metadata access:** AGI has run the gigateway discovery metadata service for several years and are keen that a replacement service will be put in place as soon as possible. With many years of expertise in running a national metadata service, AGI would be pleased to collaborate with Government on the implementation of future metadata access. We have carried out some preparatory work for this through the development of the GEMINI metadata specification, and investigations into technical and operational issues associated with a metadata service.
- 5.2 **Core reference data:** These underpin the UKLS and AGI believes that it is important that they are made available for common, widespread and unrestricted use.
- 5.3 **Data exchange:** AGI supports the establishment of suitable standards for data exchange through its sponsorship of the British Standards committee for Geographic Information (IST/36), and their input to International (ISO) and European (CEN) Standards. AGI can provide specialist expertise to the UKLS in this area.
- 5.4 **Education:** AGI provides a range of informative events to increase awareness of geographic information in the user community in line with the UKLS's objectives. AGI would be pleased to contribute to the UKLS communication process, being ideally placed and as an established conduit to the broad community of stakeholders.
- 5.5 **Governance:** AGI welcomes the intention to revise and modify the governance model overseeing the implementation of the UKLS, to increase the availability of data.
- 5.6 **Licensing:** AGI supports the review and simplification of licensing of core location based datasets to remove barriers to their usage.

Submitted by

Chris Holcroft, Director
Association for Geographic Information (AGI)
5 St Helen's Place
Bishopsgate
LONDON
EC3A 6AU
Tel: 020 7036 0382
Email: chris.holcroft@agi.org.uk

Date of submission: Friday 30 January 2009