

FISH HOEK VALLEY RATEPAYERS & RESIDENTS ASSOCIATION

(Incorporating Fish Hoek, Clovelly and Sun Valley)

Central Circle, Fish Hoek 7975

Web: <https://www.fishhoekratepayers.com/> Facebook: www.facebook.com/FHVRRA/

Heritage Western Cape: Conservation Body

TO: OPEN DATA open.data@capetown.gov.za

CC: NEIL HOORN neil.hoorn@capetown.gov.za

COUNCILLOR SHARON COTTLE sharon.cottle@capetown.gov.za

SUBJECT: COMMENTS ON CITY'S OPEN DATA POLICY ¹

DUE DATE: 31 JULY 2020

1. DISCUSSION

Thank you for this opportunity to comment on this important policy.

We support item 1.1's "the role played by data...in open economies" and item 1.2 "useful to citizens". We have found that City information has been difficult to access or our access has been impeded. We are thankful that information will finally be free as stated in item 1.3 and 7.1.5 as we have had to pay admin fees in the past, completed POAIA forms and signed non-disclosure agreements. We agree that open data will assist citizen engagement as stated in item 2.1.1.

Item 2.1.4 would allow a great improvement in coordinated activities between departments. We have lost count of a service upgrade, say lining or replacement of water pipes, then the road surface is reinstated just to be dug up almost immediately again for another service, say, sewer pipe or buried electricity lines to be upgraded. This has happened consecutively three times before and should be counted as fruitless and wasteful expenditure. When is the City going to get an "enterprise-wide" project management app to coordinate all road activities?

Item 2.1.5 should support building plans being visible along with any departures or land use issues, motivation for the departures, locality map and on-line portal for support or objection.

Item 3.1 the "Well-run City" is a strategic pillar that we can support.

We wouldn't mind a synergistic City supporting more economic growth as hinted in item 3.3.

Item 3.4 needs careful review as this is what has stymied the intentions of open data before. Many national governments are declassifying previous "security" data as it actually didn't need to be kept secure or secret and the process of keeping it secure can be costly.

Please choose the City's Chief Data Officer and the Data Coordinating Committee (item 5.1) carefully or this could also stymie the intentions of this policy with many items being withheld from political oversight. We have no confidence in the City Manager acting as the appeal recipient as stated in item 7.4. We feel that an independent body should review the artificial intelligence filters put in place by the IKM in item 5.4 (and 5.1) as this process will probably be automated, in terms of a Well-run City.

Item 5.5 should include measurable outcomes in respective information source departments in the KPIs and KPAs of responsible senior officials.

Item 5.6.2 a single citizen portal has been a pipe dream for years. It would be great if Cape Town could lead this initiative, finally.

¹ <http://www.capetown.gov.za/City-Connect/Have-your-say/Issues-open-for-public-comment/draft-revised-open-data-policy>

Items 5.6.3 and 5.6.3 are worrying in the sense that another Bell Pottinger could glean City data for profit and spreading of fake news. Please put in place a proper on-going monitor on the usage of City data.

We appreciate the item's 7.1.1 directive "open by default, protected where required". The reasons for "overriding public interest against disclosure" should be stated publicly.

In terms of items 7.1.2 and 7.1.3 we argue that the two-weekly E. coli and Enterococcus water sample results' "datasets hold significant value" to us and thus, should be "prioritised for release" (item 7.1.6) with high granularity to specific site and date to be meaningful. We have been trying to find the source of these 'sewage' bacteria in our stormwater system and with the City's assistance have been taking private samples further upstream. The timely release, rather than four-to-six week delay with us constantly reminding the City, would help us by saving the cost of having to re-establish a baseline each time at the culvert's mouth.

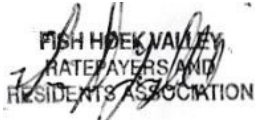
One has to be careful with what gets included in item 7.2.2's confidential data. This category could be a convenient catch-all for most inconvenient data leading to excluding the public from assisting the City with monitoring and feedback to its political representatives.

2. SUMMARY OF RECOMMENDATIONS

- Appoint an independent body to receive appeals against the decisions of the Chief Data Officer (instead of the City Manager) and to review the artificial intelligence filters put in place by the IKM in item 5.4;
- Include measurable outcomes in respective information source departments in the KPIs and KPAs of responsible senior officials;
- Reasons for excluding datasets should be made public.

In terms of item 7.5.1, we submit the following as requests for the following datasets to be made available now:

- Scientific Services' two-weekly E. coli and Enterococcus water sample results;
- Call centre (eServices) monthly service complaints by type and area;
- Progressive capital expenditure reports per project and per ward;
- Building plans submitted along with any departures or land use issues, motivation for the departures, locality map and on-line portal for support or objection; and
- Progress reports on major / significant maintenance projects against KPI of responsible officials.

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SIGNATURE	
DATE	7 July 2020

To visit the Open Data portal, users can visit the City's home page at <http://www.capetown.gov.za/> or go to <http://www.capetown.gov.za/City-Connect>, then select open data portal which will take you to the portal page at <https://odp-cctegis.opendata.arcgis.com/>.