

## Open Data Policy

### POLICY STATEMENT

The City of Hamilton (the City) is committed to the principles of accessibility, transparency and accountability in government. The Open Data program provides the following benefits:

- Increasing citizen engagement
- Building public trust through transparency and accessibility
- Increasing efficiency and reducing costs of City processes and services
- Creating value from data
- Reducing risk
- Driving innovation
- Driving a "data-driven" culture
- Evidence-based decision making

This Open Data Policy guides the City of Hamilton in providing the public, including residents, businesses and organizations, free and equitable access to City data, streamlining the flow of information and improving citizen engagement. By providing valuable, machine-readable data to the public, the Open Data Policy aligns with the broader Mission and Vision and Strategic Priority alignment of Trust and Confidence in City Government. The City recognizes that appropriate leveraging of open data to make information accessible and usable for the public can help improve public service delivery and fuel entrepreneurship, collaboration, scientific discovery and innovation. It can also enable the public to make better and more informed decisions, improving the quality of their lives. To effectively deliver on this commitment the City works to strike a balance between transparency with accessible datasets while also adhering to the rights of privacy, security, and confidentiality.

In addition, internal City of Hamilton operational efficiencies can be achieved through the Open Data Program including:

- Reducing the time/cost of processing and preparing data for consultants and contractors and
- Enabling quicker access to authoritative data internally, removing data silos, and fostering a culture of data sharing that will ultimately help staff do their jobs more efficiently.

This Policy adopts the six principles of the International Open Data Charter (IODC - [opendatacharter.net](https://opendatacharter.net)), a collaboration of over 100 governments and organizations and provides them with a common foundation to realize the full potential of open data and the ten guiding principles from Sunlight Foundation ([sunlightfoundation.com](https://sunlightfoundation.com)), a non-profit organization that focused on "transparency in Government". These principles are outlined under the "Principles" section of this Policy.

It is also the policy of the City to ensure that:

- The data it collects and generates is "Open by Default," (i.e. an obligation to make your data



available automatically, especially if it has already been released publicly in some capacity). Open by Default is not an all-encompassing concept. It implies that data must be fit for purpose. This means that data shared must be beneficial, or of interest to the public, and can be used to add value to goals or objectives. Open by Default must not be applied in cases where the posting of such data would be in violation of the Open Data Principles set forth below, all of which are collectively referred to as "Open Data Standards", as further defined and referenced throughout this Policy:

- "Open by Default" focuses on the proactive disclosure of government-held information based on availability and business value. In addition, The City of Hamilton chooses to apply this concept in anticipation of, and in response to, the public's needs and interests.
- This proactive disclosure helps reduce the time, costs and efforts associated with access requests for both the requester and the City of Hamilton.
  - This is also in line with the *Freedom of Information and Protection of Privacy Act (FIPPA)*, the *Municipal Freedom of Information and Protection of Privacy Act (MFIPPA)* and the *Personal Health Information Protection Act (PHIPA)* principles that allow institutions to make general records (that is, those records that do not contain personal and health information) publicly available on a proactive basis.
- All appropriate datasets and associated metadata, to the extent practical and over time, are published on the City's Open Data Portal ([open.hamilton.ca](http://open.hamilton.ca)).
- New information systems should, to the extent practicable, have the ability to report or ability to support data extracts in a manner consistent with the Open Data Standards outlined in this Policy.
- Departments have the responsibility to ensure data sets remain updated and relevant. When updating existing legacy information technology systems, the City will make a reasonable effort to ensure that such systems have the ability to report data in a way that meets the Open Data Standards of this Policy, unless to do so would be impracticable, result in extraordinary cost, loss of operational efficiency, or significantly impede normal business operations.
- The dataset is free from contract, 3rd party proprietary rights/claims (including copyright, trademark and patent), legal, security, confidentiality, privacy (personal identifiable information), commercially sensitive matters of public safety, and policy and or procedure restrictions.
- All City-owned datasets published to the Open Data Portal are released under Creative Commons Attribution 4.0 International ([CC BY 4.0](https://creativecommons.org/licenses/by/4.0/)) license unless explicitly noted otherwise. This license allows maximum reuse while requiring attribution.
- Third-party datasets hosted on the portal must either be in the public domain or have explicit permission from rights holders with compatible open licensing (e.g., CC BY, CC0, ODbL). Data Stewards must document third-party licensing terms in dataset metadata.

## PURPOSE

The purpose of this Policy is to:

- Provide an overview of the City's Open Data program, including the guiding principles;
- Adopt the International Open Data Charter, including Open by Default, as defined herein;
- Outline the roles and responsibilities of management staff by which City of Hamilton data is made available to the public as valuable, machine-readable datasets;
- Initiate and promote the practice of sharing and publishing data openly by educating the staff and public on:
  - What is open data and its benefits.
  - Process to make datasets available on the Open Data Portal ([open.hamilton.ca](https://open.hamilton.ca)),
  - Utilizing the tools available on [open.hamilton.ca](https://open.hamilton.ca) to interpret the datasets,
- Remove barriers and set rules by which City of Hamilton data is made available to the public; and
- Promote the graphic visualization of datasets through the Open Data Portal and through other data visualization tools used by the City.

## SCOPE

This Policy applies to all City departments, all data that the City collects and generates as well as any 3rd party data that the City has permission to post and is of value to the community, which will be Open by Default, except where the posting of such data would violate the Open Data Standards including data that is subject to statutory confidentiality requirements, for example, exempt from publication under the Municipal Freedom of Information and Protection of Privacy Act, R.S.O. 1990, Freedom of Information and Protection of Privacy Act, R.S.O. 1990, Personal Health Information Protection Act, 2004, S.O. 2004, and any other applicable legislation. We protect personal information and personal health information in accordance with our legislated obligations mentioned previously and that City departments may have differing legislative obligations that may need to be considered in light of this policy.

However, Ontario's access laws contain a "public interest override" provision which can be found in s.23 of FIPPA (<https://www.ontario.ca/laws/statute/90f31#BK40>) and s.16 of MFIPPA (<https://www.ontario.ca/laws/statute/90m56#BK22>), which require the City of Hamilton to "override" the application of certain exemptions and disclose a record in situations where there is a compelling public interest in doing so that clearly outweighs the purpose of the exemption.

Secondly, the Acts also require the City of Hamilton to disclose certain records in the public interest even when no one is asking for them. The requirement to disclose records even in the absence of an access request is found in s.11 of FIPPA (<https://www.ontario.ca/laws/statute/90f31#BK22>) and s.5 of MFIPPA (<https://www.ontario.ca/laws/statute/90m56#BK7>). It applies where a record reveals a grave environmental, health, or safety hazard and it is in the public interest to release it, despite any other provisions in FIPPA and MFIPPA.

## DEFINITIONS

The following terms referenced in this Policy are defined as:

**Common Data Standards** are any set of data collection standards designed to promote interoperability across agencies and organizations and facilitate the efficient exchange and use of information collected in different systems.

**Dataset** means a collection of raw data, such as facts, figures and statistics, that can be presented in a structured file format that is exportable and machine-readable. Datasets are usually presented in a tabular form such as tables, spreadsheets, comma-delimited, Extensible Markup Language (XML), Javascript Object Notation (JSON) and with associated Metadata. Dataset may include geospatial datasets such as shape files, Keyhole Markup Language (KML) or other open mapping formats. Items such as reports, flyers, web applications, PDF or Word Documents are not considered raw data sets. Statistical techniques such as data aggregation, suppression, or deidentification may be applied, but only in the event that raw data would reveal personal information or a risk to citizens or critical infrastructure.

**Data Source** is a system, database, or other information source that contains and reports raw data.

**FIPPA** means the Freedom of Information and Protection of Privacy Act, R.S.O 1990 that provides a right of access to records held by public bodies and regulates how public bodies manage personal information.

**Interoperability** is the ability of different information technology systems, software and data applications to communicate and exchange data, and use the information that has been exchanged.

**Machine Readable Data** means data in a form that a computer can process.

**Metadata** means data that describes or explains datasets by providing information about their contents. Examples of Metadata include the source of the information, its purpose, how it should be interpreted, the date of creation or modification, date range covered and a description of the dataset.

**MFIPPA** means the Municipal Freedom of Information and Protection of Privacy Act, R.S.O. 1990 that governs how the City collects, uses, discloses and disposes of information and records.

**Open by Default** means making data accessible to the public by default, unless there is sufficient justification not to make the data accessible to all through an explanation that greater public interest may be at stake as a result of disclosure including privacy, security and confidentiality.

**Open Data** means City data that is owned by the City of Hamilton, meets the Open Data



principles, has been proactively made freely available to the public on the City's external Open Data Portal (subject to the Terms of Use and user license) in a recognized and usable format, follows the requirements and is in accordance with this Policy. It is recognized that the Open Data Portal has the potential to also host non-City owned, or 3rd party data, that is of value to the community and that the City has permission to host, and any such non-City data would be reviewed against the same standards required for City data.

**Open Data Portal** is a single web portal maintained by the City that will be the repository and public access point for all the City's Open Data specifically [open.hamilton.ca](https://open.hamilton.ca).

**PHIPA** means the Personal Health Information Protection Act, 2004, S.O. 2004 that establishes rules for the collection, use and disclosure of personal health information and records.

**Personal Health Information** is identifying information about an individual, whether oral or recorded if the information:

- relates to the individual's physical or mental condition, including family medical history,
- relates to the provision of health care to the individual,
- is a plan of service for the individual,
- relates to payments, or eligibility for health care or for coverage for health care,
- relates to the donation of any body part or bodily substance or is derived from the testing or examination of any such body part or bodily substance,
- is the individual's health number, or
- identifies a health care provider or a substitute decision-maker for the individual.

**Personal Information** means recorded information about an identifiable individual, including but not limited to:

- information relating to the race, national or ethnic origin, colour, religion, age, sex, sexual orientation or marital or family status of the individual,
- information relating to the education or the medical, psychiatric, psychological, criminal or employment history of the individual or information relating to financial transactions in which the individual has been involved,
- any identifying number, symbol or other particular assigned to the individual,
- the address, telephone number, fingerprints or blood type of the individual,
- the personal opinions or views of the individual except where they relate to another individual,
- correspondence sent to an institution by the individual that is implicitly or explicitly of a private or confidential nature, and replies to that correspondence that would reveal the contents of the original correspondence,
- the views or opinions of another individual about the individual, and
- the individual's name where it appears with other personal information relating to the individual or where the disclosure of the name would reveal other personal information about the individual

**Primary Source Data** means original information created or collected by the City.

## PRINCIPLES

The determination of which datasets will be posted on the Open Data Portal will be driven by public and business demand for specific information and by the Open by Default principles implemented through the adoption of the International Open Data Charter (IODC).

These six open data principles of IODC are well aligned with the City's principles of transparent government and are:

1. Open by default
2. Timely and comprehensive
3. Accessible and useable
4. Comparable and interoperable
5. For improved governance and citizen engagement, and
6. For inclusive development and innovation

Along with the principles above, the guiding principles which are recommendations from the Sunlight Foundation, will be adopted by the City of Hamilton. Some of them overlap with the principles of IODC, however, they provide the necessary structure for public sector engagement with open government and ensure that the data is open, accessible and reusable. They also help to determine what and how data should be made available to the public. The Sunlight Foundation principles are completeness, primacy, timeliness, ease of physical and electronic access, machine readability, non-discrimination, use of commonly owned standards, licensing, permanence and usage costs.

The six open data principles of IODC and ten guiding principles of Sunlight Foundation will collectively be referred to as "Guiding Principles" by the City of Hamilton. A complete description of these principles can be found in Appendix A.

The City of Hamilton is also in alignment with federal open data best practices as outlined by the Government of Canada's Digital ambition, priority 2.1 to maximize the public value of data and information by prioritizing "the release of high-quality and demanded open data and information to allow the public to generate their own economic and social value". <https://www.canada.ca/en/government/system/digital-government/government-canada-digital-operations-strategic-plans/canada-digital-ambition.html>

The City will only post datasets if they comply with all of the above-mentioned guiding principles.

## PROCESS

### Prioritization for Posting to the Open Data Portal

Given that the City collects and manages a wide array of data, the following will be taken into consideration when posting on the Open Data Portal:

- Each Department will prioritize which datasets should be submitted for approval and eventual posting of data within its purview, taking into consideration the time and resources required to extract, format, maintain and publishing of datasets. A list of dataset types is mentioned in the dataset definition.
- Interest in particular datasets expressed by City Council and the community, and as to what degree the posting of data would improve transparency and public service delivery, the relative accuracy of datasets, and any technical challenges in the transmittal of data to the Open Data Portal.
- Where possible, the prioritization process should additionally include an assessment of the benefits to the public of publication and alignment with the principles outlined in this Policy.
- For guidance, priority for publication should be given to:
  - The City of Hamilton-held information that has been identified as being of high value by public feedback. This includes information that:
    - Is the subject of a high number of website searches, related webpage usage and freedom of information or other requests
    - Is collected or produced in support of the City of Hamilton priorities
    - Increases transparency and accountability, specifically information used to create legislation, regulations, or information related to asset management, procurement contracts/records and audited financial information
    - Is useful for internal and external stakeholders' evaluation of the delivery of policy, programs or services
    - Can help improve the delivery of programs and services
  - Information that will cost less to release, such as data that is already published or collected in a machine-readable format and will take less time and resources to prepare for publication (these Datasets could be released initially).

### Dataset Lifecycle and Quality Management

The City manages datasets through a standardized process to ensure quality, relevance, and accountability:

- Departments identify candidate datasets and submit via the Open Data intake process;
- Data Stewards complete metadata requirements and quality assessments across four dimensions (accuracy, completeness, timeliness, consistency);
- Open Data Evaluation Group reviews against privacy, legal, security, and quality standards;
- Approved datasets are published to [open.hamilton.ca](https://open.hamilton.ca) with complete metadata and quality



scores;

- Data Stewards maintain ongoing accuracy, refresh cycles, and metadata currency;
- Datasets no longer relevant are archived with clear deprecation notices.

Datasets are to be published only when data is deemed as “Public”.

## **ROLES & RESPONSIBILITIES**

The following positions and/or departments are responsible for fulfilling the responsibilities detailed in this Policy as follows:

### **Chief Information Officer:**

- Accountable for the overall Open Data program and responsible for chairing and determining the membership of the Open Data Working Group and Open Data Evaluation Group;
- Has authority to revise the outlined roles and responsibilities or assign additional roles and responsibilities related to the implementation of this Policy as needed;
- Has authority to make the final decision, in consultation with the City Manager, Senior Leadership Team (SLT) and relevant organizational subject matter experts who will review and action accordingly if the Open Data Evaluation Group cannot reach consensus on the posting of a Dataset.

### **Open Data Working Group:**

- Leading the development/implementation of an Open Data platform, in consultation with the Digital Office, Spatial Solutions & Data Services Team (IT Division);
- Defining and documenting detailed processes as continuous improvement to assist respective departments and City staff to assess Datasets to ensure they meet the Guiding Principles outlined in this Policy. For instance, how a specific Dataset is labeled may change for a number of reasons including a change in law or new data analysis. As an example, data that itself may not contain personally identifiable information may reveal such information when combined with other datasets;
- Providing support to departments wherever possible (e.g. assist staff with defining Datasets, periodic review of available Datasets and ensuring the appropriate assessment and approval of release occurs prior to the publication of data);
- Building engagement strategies with the staff and the public to promote the benefits and uses of Open Data;
- Managing public engagement and feedback mechanisms, including:
  - Monitoring the Open Data inbox ([opendata@hamilton.ca](mailto:opendata@hamilton.ca))
  - Responding to dataset requests and inquiries within 10 business days
  - Conducting periodic public consultations on dataset priorities
  - Facilitating co-creation opportunities (e.g., civic tech partnerships)
  - Reporting feedback themes quarterly to the Chief Information Officer



- Establishing and providing a master list of Datasets in Open Data;
- Fostering and communicating about the Open Data program within the organization and external stakeholders as applicable;
- Determining the training needs of applicable staff, including processes for approval and uploading of datasets;
- Designating a single point of contact to respond to inquiries related to Open Data, and
- Monitoring the overall Open Data program.

**Open Data Evaluation Group:**

Open Data Evaluation Group is the internal multi-departmental staff group that:

- Organizes monthly open data evaluation meetings;
- Reviews open dataset submissions and metadata for the applicability of any publication exemptions, as well as how exemptions should be tested to ensure they have been reliably applied and ultimately approve them;
- The Open Data Evaluation group must include representation from Privacy and Legal to ensure the release of data is in compliance with all applicable legislation;
- Other departmental representatives may also be included in the Open Data Evaluation Group, as appropriate.

**City Manager, General Managers and Directors:**

- Ensuring applicable managers/supervisors are aware of and trained on this Policy, its Guidelines and procedures;
- Fostering and supporting the Open Data program wherever possible (e.g. ensuring adequate resource allocation and periodic review of available Datasets);
- Incorporating Open Data initiatives into their business planning processes, including requiring that Information Technology systems and related procurements support Open Data;
- Reviewing and recommending Datasets for publication after ensuring they meet the guiding principles outlined in this Policy.

**Managers/Supervisors:**

- Ensuring applicable staff are aware of and trained on this Policy, its Guidelines and procedures;
- Identifying datasets for inclusion in the Open Data program, including Open by Default;
- Assigning responsibility for the capture of metadata and the maintenance and timely posting of specific datasets to appropriate staff;
- Ensuring key datasets and metadata are accurate and available in a timely manner;
- Assigning responsibility for the quality and integrity of datasets to appropriate staff;
- Regularly reviewing applicable Open Data to ensure it is being maintained and/or is still relevant and that the data continues to meet the City's privacy, security and confidentiality, and any other legal requirements;
- Developing and implementing long-term data quality improvements, where possible and as



required;

- Proactively monitoring or verifying the accuracy of data through tracking of metadata, and
- Participating in the communication and engagement relevant to datasets they manage.

**Data Steward:**

- Works in collaboration with the Spatial Solutions and Data Services team in the publication of datasets by defining rules, requirements, and plans for data delivery.
- Ensures that the data is accessible, usable, safe, and trusted.
- Fills out the required forms for open data submission and participates in Open Data Evaluation meetings for the approval of data.
- Provide complete and clear information (i.e. metadata) about the data file: variables, data source, caveats/limitations etc. to ensure proper use of data.
- Helps ensure that the data structures that are set up, coincide with and support the department's business objectives.
- Ensures that data (extracted) from applications administered by the business unit are stored in a way that makes the most sense to the business unit and the individuals who need to access and work with it.
- Collaborates with the Spatial Solutions and Data Services team in supporting the data quality life cycle for the dataset supplied by the business unit:
  - Sets quality improvement priorities and plans by identifying
    - what needs to be fixed or improved,
    - what needs to be monitored, and
    - what needs to be reported.

**Open Data Champions:**

- Each Department General Manager shall designate one staff member to serve as Open Data Champion.
- Disseminates Open Data resources to their respective divisions.
- Facilitates the connection between the Open Data Program and the Division.
- Advocates for an open data culture.
- Encourages staff to identify/recommend data for Open Hamilton.

**COMPLIANCE**

Where an employee does not comply with their role and responsibilities as outlined in the Open Data Policy and applicable guidelines and procedures, such non-compliance issues will be brought to the Chief Information Officer for review. The Chief Information Officer, in consultation with City Manager, SLT, City Clerk and relevant organizational subject matter experts will review and action accordingly.

Violations of this Policy may result in appropriate disciplinary measures, up to and including termination of employment or offer of employment.

## City Manager's Office Policy

Digital & Innovation

Policy No: CM-23-001

Page 11 of 18



Content Updated: 2025-10-20

Supersedes Policy: N/A

Approval: 2025-10-20

### RELATED DOCUMENTS

N/A

### HISTORY

The following stakeholders were consulted in the creation or revisions made to this Policy:

- Chief Information Officer
- Legal Services / City Solicitor
- City Manager's Office
- Senior Leadership Team
- Information Technology
- Privacy Specialist

This Policy was developed by the Digital & Innovation Office as a new policy 2023-05-02

This Policy was approved by the Chief Information Officer 2025-10-20

## **Appendix A**

The six IODC principles, developed in 2015 by governments, civil society, and experts around the world to represent a globally agreed set of aspirational norms for how to publish data, as adopted by this Policy (and their informal explanation) are:

- 1. Open By Default:** This represents a real shift in how government operates and how it interacts with citizens. At the moment we often have to ask officials for the specific information we want. Open by default turns this on its head and says that there should be a presumption of publication for all. Governments need to justify data that's kept closed, for example for security or data protection reasons. To make this work, citizens must also feel confident that open data will not compromise their right to privacy.
- 2. Timely and Comprehensive:** Open data is only valuable if it's still relevant. Getting information published quickly and in a comprehensive way is central to its potential for success. As much as possible governments should provide data in its original, unmodified form.
- 3. Accessible and Usable:** Ensuring that data is machine readable and easy to find will make data go further. Portals are one way of achieving this. But it's also important to think about the user experience of those accessing data, including the file formats that information is provided. Data should be free of charge, under an open license, for example, those developed by Creative Commons.
- 4. Comparable and Interoperable:** Data has a multiplier effect. The more quality datasets you have access to, and the easier it is for them to talk to each other, the more potential value you can get from them. Commonly-agreed data standards play a crucial role in making this happen.
- 5. For Improved Governance & Citizen Engagement:** Open data has the capacity to let citizens (and others in government) have a better idea of what officials and politicians are doing. This transparency can improve public services and help hold governments to account.
- 6. For Inclusive Development and Innovation:** Finally, open data can help spur inclusive economic development. For example, greater access to data can make farming more efficient, or it can be used to tackle climate change. Finally, we often think of open data as just about improving government performance, but there's a whole universe out there of entrepreneurs making money off the back of open data.



The “Ten Principles For Opening Up Government Information” as recommended by Sunlight Foundation that are referenced in this policy are:

1. **Completeness:** Datasets released by the government should be as complete as possible, reflecting the entirety of what is recorded about a particular subject. All raw information from a dataset should be released to the public, except to the extent necessary to comply with applicable law regarding the release of personally identifiable information. Metadata that defines and explains the raw data should be included as well, along with formulas and explanations for how derived data was calculated. Doing so will permit users to understand the scope of information available and examine each data item at the greatest possible level of detail.
2. **Primacy:** Datasets released by the government should be primary source data. This includes the original information collected by the government, details on how the data was collected and the original source documents recording the collection of the data. Public dissemination will allow users to verify that information was collected properly and recorded accurately.
3. **Timeliness:** Datasets released by the government should be available to the public in a timely fashion. Whenever feasible, information collected by the government should be released as quickly as it is gathered and collected. Priority should be given to data whose utility is time sensitive. Real-time information updates would maximize the utility the public can obtain from this information.
4. **Ease of Physical and Electronic Access:** Datasets released by the government should as accessible as possible, with accessibility defined as the ease with which information can be obtained, whether through physical or electronic means. Barriers to physical access include requirements to visit a particular office in person or requirements to comply with particular procedures (such as completing forms or submitting FOIA requests). Barriers to automated electronic access include making data accessible only via submitted forms or systems that require browser-oriented technologies (e.g., Flash, Javascript, cookies or Java applets). By contrast, providing an interface for users to download all of the information stored in a database at once (known as “bulk” access) and the means to make specific calls for data through an Application Programming Interface (API) make data much more readily accessible. (An aspect of this is “findability,” which is the ability to easily locate and download content.)
5. **Machine Readability:** Machines can handle certain kinds of inputs much better than others. For example, handwritten notes on paper are very difficult for machines to process. Scanning text via Optical Character Recognition (OCR) results in many matching and formatting errors. Information shared in the widely-used PDF format, for example, is very difficult for machines to parse. Thus, information should be stored in widely-used file formats that easily lend themselves to machine processing. (When other factors necessitate the use of difficult-to-parse formats, data should also be available in machine-friendly formats.) These files should be accompanied by documentation related to the format and how to use it in relation to the data.

- 6. Non-discrimination:** “Non-discrimination” refers to who can access data and how they must do so. Barriers to use of data can include registration or membership requirements. Another barrier is the uses of “walled garden,” which is when only some applications are allowed access to data. At its broadest, non-discriminatory access to data means that any person can access the data at any time without having to identify him/herself or provide any justification for doing so.
- 7. Commonly owned or open Standards:** Commonly owned or open standards refer to who owns the format in which data is stored. For example, if only one company manufactures the program that can read a file where data is stored, access to that information is dependent upon use of the company’s processing program. Sometimes that program is unavailable to the public at any cost, or is available, but for a fee. For example, Microsoft Excel is a fairly commonly-used spreadsheet program which costs money to use. Freely available alternative formats often exist by which stored data can be accessed without the need for a software license. Removing this cost makes the data available to a wider pool of potential users.
- 8. Licensing:** The imposition of “Terms of Service,” attribution requirements, restrictions on dissemination and so on acts as barriers to public use of data. Maximal openness includes clearly labeling public information as a work of the government and available without restrictions on use as part of the public domain.
- 9. Permanence:** The capability of finding information over time is referred to as permanence. Information released by the government online should be sticky: It should be available online in archives in perpetuity. Often times, information is updated, changed or removed without any indication that an alteration has been made. Or, it is made available as a stream of data, but not archived anywhere. For best use by the public, information made available online should remain online, with appropriate version-tracking and archiving over time.
- 10. Usage Costs:** One of the greatest barriers to access to ostensibly publicly-available information is the cost imposed on the public for access—even when the cost is minimal. Governments use a number of bases for charging the public for access to their own documents: the costs of creating the information; a cost-recovery basis (cost to produce the information divided by the expected number of purchasers); the cost to retrieve information; a per page or per inquiry cost; processing cost; the cost of duplication etc. Most government information is collected for governmental purposes, and the existence of user fees has little to no effect on whether the government gathers the data in the first place. Imposing fees for access skews the pool of who is willing (or able) to access information. It also may preclude transformative uses of the data that in turn generates business growth and tax revenues.

## **Appendix B**

The following is a sample of the information required via **Open Data Intake Form** for all datasets hosted on the Open Data Portal. These requirements may change over time but are provided as reference information.

- Requestor name, phone number and email
- Division, Department and Section Information
- Dataset Name
- Description of Dataset
- Purpose of the Data
- Source(s) of the Data
- Is the business area the primary source for the data that is being submitted? (Y/N)
- Was the data derived from another data source, or contain any 3<sup>rd</sup> party information (Y/N)
- How was the data collected?
- Does the data contain any personal identifiable information as defined by MFIPPA or personal health information as defined in PHIPA?
- Does the data contain any legal, security, confidential, commercially sensitive, matters of public safety, policy and or procedure restrictions?
- Data Format (CSV, XLS, SHP, KML, XML, Other)
- Dataset creation date
- How much effort is required to prepare this data for publishing?
- How often will the dataset be refreshed?
- Has the accuracy & quality of the data been reviewed by the business unit prior to this submission? (Y/N) and reason if (N)?
- Does one have the authority to publish this dataset? (Y/N)
- Is the Communication Office aware of this initiative? (Y/N)
- Is this dataset currently being provided to public/businesses? (Y/N)

In addition to the information above, the following information needs to be provided via **Open Data Submission Form** for all datasets hosted on the Open Data Portal require:

- Field/Attribute Descriptions
- Dataset Attributes

## Appendix C

### Change Summary

This appendix provides a comprehensive record of all revisions made to the policy document.

#### Change Summary Revision 1.1

- 1.11 New sub-section **Dataset Lifecycle & Quality Management** added to **Process**, resolved duplicated and redundant information. [Page 7]
- 1.12 New: Default Licensing Standard (CC BY 4.0) added to **Policy Statement** [Page 2]
- 1.13 New: Public engagement and feedback expectations added to **Open Data Working Group** in **Roles & Responsibilities** [Page 8]
- 1.14 Replacement: **Appendix B:** process title change, replaced submission with intake [Page 15]
- 1.15 New: Open Data benefit updated in **Policy Statement** [Page 1]
- 1.16 Replacement: Chief Digital Officer with Chief Information Officer to reflect current organizational structure throughout policy.
- 1.17 Replacement: Review interval changed from 2 to 3 years
- 1.18 Addition: **Personal Information** definition [Page 5]
- 1.19 Addition: City Clerk to **Compliance** [Page 10]
- 1.110 Addition: Expanded **Open Data Evaluation Group** [Page 9]

#### Changes Full Text Revision 1.1

- 1.11 ADDITION – Page 7 – **Process: Dataset Lifecycle & Quality Management**

*Addition of process cycle for dataset management, removed duplicate information.*

*ADDITION: lifecycle process and quality reporting*

**Dataset Lifecycle & Quality Management**

The City manages datasets through a standardized process to ensure quality, relevance, and accountability: Departments identify candidate datasets and submit via the Open Data intake process; Data Stewards complete metadata requirements and quality assessments across four dimensions (accuracy, completeness, timeliness, consistency); Open Data Evaluation Group reviews against privacy, legal, security, and quality standards; Approved datasets are published to open.hamilton.ca with complete metadata and quality scores; Data Stewards maintain ongoing accuracy, refresh cycles, and metadata currency; Datasets no longer relevant are archived with clear deprecation notices.

REMOVAL: *lifecycle information, nested with prioritization criteria*

Each open data set undergoes an assessment adhering to the City's data scoring methodology to help users identify data quality, completeness and overall usability. Scores are calculated on an ongoing basis and are published to open.hamilton.ca.

REMOVAL: *duplicated with lifecycle and assessment*

Metadata requirements: Departments should provide the required information via Open Data Submission Form and Open Data Metadata Form for all datasets hosted on the Open Data Portal. Additional details can be found in Appendix B.

1.12 ADDITION – Page 2 – **Policy Statement:** Licensing Standard and Third Party

ADDITION: *to resolve any licensing confusion setting standard*

All City-owned datasets published to the Open Data Portal are released under Creative Commons Attribution 4.0 International (CC BY 4.0) license unless explicitly noted otherwise. This license allows maximum reuse while requiring attribution. Third-party datasets hosted on the portal must either be in the public domain or have explicit permission from rights holders with compatible open licensing (e.g., CC BY, CC0, ODbL). Data Stewards must document third-party licensing terms in dataset metadata.

1.13 ADDITION – Page 8 – **Roles & Responsibilities: Open Data Working Group**

ADDITION: *responsibilities for public engagement and feedback mechanisms with 10 day response window*

Managing public engagement and feedback mechanisms, including: Monitoring the Open Data inbox ([opendata@hamilton.ca](mailto:opendata@hamilton.ca)); Responding to dataset requests and inquiries within 10 business days; Conducting periodic public consultations on dataset priorities; Facilitating co-creation opportunities (e.g., civic tech partnerships); Reporting feedback themes quarterly to the Chief Information Officer.

1.14 REPLACED – Page 15 – **Appendix B**

Replaced: **Open Data Submission Form** with **Open Data Intake Form**

1.15 ADDITION – Page 1 – **Policy Statement**

ADDITION: *added a benefit to Open Data for organizational alignment*

Building public trust through transparency and accessibility

1.16 REPLACED: Chief Digital Officer changed to Chief Information Officer to reflect current organizational structure throughout policy

Replaced: **Chief Digital Officer** changed with **Chief Information Officer** on pages 8, 10 and 11.

1.17 REPLACED: Replacement: Review interval changed from 2 to 3 years in document

footer

Replaced: ***Review Interval: Every 2 years*** with ***Review Interval: Every 3 years***

1.18 ADDITION: Personal information definition [Page 5]

Added '*but not limited to*' in the first sentence on the personal information definition.

1.19 ADDITION: City Clerk to compliance section [Page 10]

Added 'City Clerk' to the following sentence: *The Chief Information Officer, in consultation with City Manager, SLT, City Clerk and relevant organizational subject matter experts will review and action accordingly.*

1.111 Addition: Expanded **Open Data Evaluation Group** [Page 9]

Removed "*Includes representation from Privacy and Legal as well as other departmental representatives as appropriate.*" And replaced with expanded points:

- *"The Open Data Evaluation group must include representation from Privacy and Legal to ensure the release of data is in compliance with all applicable legislation;*
- *Other departmental representatives may also be included in the Open Data Evaluation Group, as appropriate."*