Disclosing Freedom of Information Releases

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Abstract

The Freedom of Information (FOI) Acts passed in 2000 in England and Wales and in 2002 in Scotland require organisations, including UK Higher Education Institutions (HEI), to provide requested information within certain conditions. The JISC Information Governance Gateway (JIGG) project aims to provide a single online gateway into information and resources related to HEIs' compliance with information governance legislation, including FOI. One of the project's objectives is to provide dissemination of the FOI disclosure logs by a web search within the gateway and also using the Open Archives Initiative Protocol for Metadata Harvesting (OAI-PMH). It is hoped this will assist HEI records management practitioners in sharing their experiences of dealing with FOI requests, and lead to future collaborations within a wider community. This paper describes the development of a JIGG FOI Application Profile as a 'template' for FOI disclosure log entries, and its subsequent translation into a practical application.

Keywords: Freedom of Information; information governance; records management; OAI-PMH; Dublin Core Application Profile

1 Introduction

The Freedom of Information (FOI) Acts passed in 2000 in England and Wales [1] and in 2002 in Scotland [2] require organisations to provide requested information to enquirers within a given timescale, unless the requested information is exempted under the legislation. The organisations covered by this requirement include UK Higher Education Institutions (HEI). To show just a few examples, people have asked The University of Manchester for information about the University's coat of arms, the amount of money taken in library fines, prospectuses supplied on recycled paper, and the awarding of honorary degrees to the Bee Gees.

HEIs are encouraged to publish disclosure logs that summarise the FOI requests they have received and the information they have released. Currently only a minority of HEIs maintain such public disclosure logs and in most cases these consist of simple lists on web pages, for example one page per year. Many other UK organisations do publish FOI disclosure logs but not in any consistent format or single place [3].

The JISC Information Governance Gateway (JIGG) project [4] aims to provide a single online gateway into information and resources related to HEIs' compliance with information governance legislation, including FOI, as well as data protection, environmental information, practical issues such as records management and related legislation such as copyright. The gateway also provides a private discussion area for HEI records management practitioners.

In addition to being a portal for relevant and up-to-date information about governance resources, JIGG publishes HEI Publication Schemes as defined under the FOI Acts, and Disclosure Logs where available. A project objective is to provide dissemination of the FOI disclosure logs [5] using the Open Archives Initiative Protocol for Metadata Harvesting (OAI-PMH) [6] as well as providing a web search within the gateway. Provision of a JIGG FOI OAI-PMH service will allow other applications regularly to gather new JIGG FOI disclosure log entries into their own databases. It is hoped this will assist HEI records management practitioners in sharing their experiences of dealing with FOI requests, and lead to future collaborations within a wider community.

2 Methodology

2.1 The JIGG FOI Domain Model

In order to disseminate the FOI disclosure log entries over OAI-PMH it was necessary to define a 'template' of appropriate data fields. This was developed by investigating the content of existing FOI disclosure logs, with

subsequent agreement within the community, the 'template' being expected to conform to the requirements of the Office of the Information Commissioner, the Scottish Information Commissioner and the Department of Constitutional Affairs. Thus the main entity within the JIGG FOI domain, or application, model is an FOI disclosure log entry, comprising this identified set of properties. Additionally each disclosure log entry has an associated set of administrative metadata that describes information 'about' the disclosure log entry within the application.

A disclosure log entry is a 'closed' record of a request for, and the release of, information. It is not anticipated that there would be any changes to FOI disclosure log entries after they've been entered into the JIGG system, except for minor textual corrections.

2.2 The JIGG FOI Application Profile

The disclosure log entry and the administrative metadata are documented using a Dublin Core Application Profile, based on the European standard (CEN Workshop Agreement) Dublin Core Application Profile (DCAP) Guidelines [7]. Standard Dublin Core properties [8] are used where applicable. The Application Profile indicates the source Dublin Core definitions of and comments about these properties as well as the application specific variations. Additional JIGG specific properties have been introduced where there were no suitable standard properties. Each of these is defined in a JIGG FOI namespace, currently within a human readable 'mini application profile' with its URI (Uniform Resource Identifier, a unique persistent identifier within the global internet) grounded on its position in that document, and with an intention of persistence.

The DCAP Guidelines specify an application profile that captures a single entity. This corresponds to a single resource description within the Dublin Core Abstract Model (DCAM) [9], which specifies a flat set of properties for a single resource, with no provision for any composite properties according to any hierarchical model and syntax. Thus some extension of the DCAP has been made to capture both a disclosure log entry and its associated administrative metadata, which together make up a "description set" within the DCAM. Thus the DCAP is composite with a section for each "description", preceded by a section that specifies these entities.

2.3 FOI Disclosure Log Entry Properties

Some of the properties within an FOI disclosure log entry are available for discovery purposes through the application. These properties capture the content of the request, when it was made, the HEI, and the relevant legislation and exemptions. All the properties provide documentation of the course of a request, such detail being potentially useful for processing future similar requests.

Table 1 lists the FOI disclosure log entry properties taken from namespaces Dublin Core ('dc' and 'dcterms') and JIGG ('jigg'), the URIs of which are defined within the 'dcxm:descriptionSet' of Figure 2. Occurrence requirements are displayed as 'Min' and 'Max', which also implicitly indicate whether properties are mandatory or optional and whether they are repeatable.

An FOI disclosure log entry contains several properties that summarise in free text the information that was requested, the information that was released and how the request was processed. Each disclosure log entry has a title indicating very briefly the topic of information requested. A more detailed summary of the request is the free text value of a description property. Optional summaries of the information released and the process of answering the request are further text fields. The topic of a request may be indicated by terms taken from the JISC Function Activity Model Vocabulary [10]. Each of the textual fields can be tagged with a language code, included for possible future enhancement of the application.

The HEI to which the FOI request was made is captured as the publisher. The JIGG FOI data submission system aims to ensure consistency of institution names. The country where the HEI is based is captured with values taken from a JIGG-defined vocabulary, which currently contains only the four UK countries (England, Northern Ireland, Scotland and Wales). An optional local identifier may be included where it is used by the HEI to denote the log entry. Ideally this identifier should be a URI and mandatory. But it was felt that at this stage of the JIGG project, requiring a global identifier may present too high a barrier to inclusion of records from information governance practitioners who may not currently use a consistent identification system, and may not be conversant with URIs. HEIs may currently publish some details of their FOI requests in some way, possibly a web page describing several requests within some time period. Thus a link to this composite disclosure log is included. Some HEIs publish the full text of the information released, so the disclosure log entry has an optional, repeatable link to possibly several documents.

Property	Definition (Summary)	Content / Vocabulary	Min	Max
dc:title	Title of log entry	text	1	1
dc:identifier	Local identifier		0	1
dc:publisher	Organisation publishing log	text	1	1
jigg:country	Country of publishing organisation	England; Northern Ireland; Sotland; Wales	1	1
dcterms:isPartOf	Organisation's disclosure log	URI	1	1
jigg:dateReceived	Date FOI request received	W3CDTF	1	1
dc:description	Summary of information requested	text	1	1
dc:subject	Topic of request	Function Activity Model vocabulary (in jigg namespace)	0	unbounded
jigg:infoReleased	How much information released	no; partial; yes	1	1
jigg:legislation	Applicable legislation	Freedom of Information Act 2000; Freedom of Information (Scotland) 2002; Environmental Information Regulations 2004; Environmental Information (Scotland) Regulations 2004	1	1
jigg:exemptionsUsed	Exemptions used when processing request	Exemptions relevant to above applicable legislation taken from vocabulary in jigg namespace	0	unbounded
jigg:requestHistory	How request was processed	text	0	1
jigg:responseSummary	Summary of information released	text	0	1
dcterms:references	Full text response	URI	0	unbounded

Table 1: FOI Disclosure Log Entry Properties (jigg:foiLog)

The date on which an FOI request was received is included within the disclosure log entry. It is probable that this date will be used for discovery, as well as providing a record of when the request occurred. Within the plethora of Dublin Core 'date' element refinements there was not one that exactly fitted the semantics of receipt date. It seemed a better option to define a JIGG-specific property rather than trying to shoehorn a definition into an inappropriate Dublin Core date property, or adopting a term from an obscure namespace. Theoretically it would seem appropriate to indicate closure in dealing with an FOI request by also capturing the completion date, especially as the FOI Acts specify time limits. However, in practice, practitioners were reluctant for this detail to be included, partly because of a belief that it would expose them to unwelcome levels of scrutiny. Because there are concerns about the initial level of engagement with the project by HEI FOI practitioners, it was decided to omit completion date from the set of properties in the Application Profile.

The FOI Acts define various exemptions under which it is permissible to refuse to provide information or to supply it only partially. There are some differences in the lists of exemptions or in their wording between the Freedom of Information Act 2000, which applies to England and Wales [11], and the Freedom of Information Act (Scotland) 2004 [12]. Another pair of differing exemptions lists apply to the Environmental Information Regulations 2004 [13] and the Environmental Information Regulations (Scotland) 2004 [14]. Thus it is beneficial to record under which legislation, of these four, an FOI request has been processed, which exemptions were relevant (a repeatable property), and how much information was released (possible values being 'no', 'partial', or 'yes'). Each of these properties has a JIGG-defined vocabulary. Although the exemptions associated with the various legislations are listed in several publicly available documents, there do not appear to be any existing formal vocabularies. Thus vocabularies have been defined within the JIGG FOI namespace for reference by property values within the JIGG FOI application.

2.4 FOI Disclosure Log Entry Administrative Metadata

Associated with an FOI disclosure log entry is a set of administrative metadata, listed in Table 2. This includes the URI of the publishing organisation, which is JIGG itself for the central JIGG FOI application, and the originating organisation, which is the URI corresponding to the HEI named as publisher within the log entry itself. A JIGG identifier, a URI, is assigned to each FOI disclosure log entry within the application.

There are various rights captured about the disclosure log entry. Copyright belongs to the publishing HEI. Creative Commons [15] rights cover subsequent use of the disclosure log entry, indicating that the information is freely available for non-commercial use, provided attribution of its provenance is maintained, but no derivatives may be made. This seemed an appropriate rights statement for information released from publicly funded HEIs. A further rights statement requires that this administrative metadata must always be retained with the disclosure log entry.

The date when a disclosure log entry was entered into the JIGG FOI database, or when it was last updated, is recorded as 'dcterms:modified', which "dumbs down" to 'dc:date' when the administrative metadata is supplied according to simple Dublin Core. This is the significant date used for the OAI-PMH application, which provides harvesting based on 'last modification date'.

Finally there is a relation that ties the administrative metadata to the disclosure log entry. This relation is used when both entities appear within an XML document description set, with value an internal identifier of the disclosure log entry within that document. It is not used for OAI-PMH dissemination where the relation between the 'about' part of a record and the 'metadata' is implicit.

Property	Definition (Summary)	Content
dc:identifier	Identifier of log entry within JIGG	URI
dc:creator	Originating organisation	URI
dc:publisher	Publisher of disclosure log entry	"http://www.jigg.ac.uk"
dcterms:modified	Date log entry added to JIGG repository	W3CDTF
dc:rights	Copyright over log entry	text
dc:rights	Creative Commons rights over reuse	"http://creativecommons.org/licenses/by-nc-nd/2.0/uk/"
dc:rights	Administrative metadata requirement	"The JIGG administrative metadata must always be retained with its associated disclosure log entry description."
dc:relation	Link to related FOI disclosure log entry	Local identifier within an XML document

Table 2: FOI Disclosure Log Entry Administrative Metadata (jigg:foiAdmeta)

2.5 The JIGG FOI XML Serialisation

Dissemination of records via OAI-PMH is by an XML serialisation of the data that is defined in the JIGG Application Profile [16] and conformant to an XML schema. Because the Application Profile is conformant to the Dublin Core Abstract Model (DCAM), it seemed appropriate to follow Dublin Core guidelines for the XML serialisation. A proposed 'Dublin Core in XML' [17] format that is consistent with the DCAM is under development by the Dublin Core Metadata Initiative. However the capability within this proposed XML format to support the full DCAM results in a rather verbose XML record for general usage. Although the XML data is intended for use by machines, which have no concerns about complexity apart from efficiency, there are also human considerations. A complex XML format requires more effort to both create and process, and so is consequently more error prone. Because of these concerns a restricted functionality version of Dublin Core in XML has also been suggested. The JIGG FOI XML schema follows this 'Dublin Core in XML Minimal' [18] as it is was proposed at the time of schema development.

```
@prefix dc: <http://purl.org/dc/elements/1.1/>
@prefix dcterms: <http://purl.org/dc/terms/>
@prefix jigg: <http://www.jigg.ac.uk/foi/terms/#>

DescriptionSet (
#FOILog
   Description ( DescriptionId (log-1234567-890123)
      Statement ( PropertyURI ( dc:title )
          ValueString ( "An Example FOI Disclosure Log"  Language ( en-GB ) ) )
      Statement ( PropertyURI ( dc:identifier )
          ValueString ( "02/2006" ) )
      Statement ( PropertyURI ( dc:publisher )
          ValueString ( "Somewhere University" ) )
      Statement ( PropertyURI ( jigg:country )
          VocabularyEncodingSchemeURI ( jigg:FoiCountryVocab )
          ValueString ( "England" ) )
      Statement ( PropertyURI ( dcterms:isPartOf )
          ValueURI ( <http://www.somewhere.ac.uk/foilogs/> ) )
      Statement ( PropertyURI ( jigg:dateReceived )
          ValueString ( "2006-08-01"  SyntaxEncodingScheme ( dcterms:W3CDTF ) ) )
      Statement ( PropertyURI ( dc:description )
          ValueString ( "Details of the information requested"  Language ( en-GB ) ) )
      Statement ( PropertyURI ( dc:subject )
          VocabularyEncodingSchemeURI ( jigg:FAMVocab )
          ValueString ( "D External Relations" ) )
      Statement ( PropertyURI ( jigg:infoReleased )
          VocabularyEncodingSchemeURI ( jigg:InfoReleasedVocab )
          ValueString ( "partial" ) )
      Statement ( PropertyURI ( jigg:legislation )
          VocabularyEncodingSchemeURI ( jigg:FoiLegislationVocab )
          ValueString ( "Freedom of Information Act 2000" ) )
      Statement ( PropertyURI ( jigg:exemptionsUsed )
          VocabularyEncodingSchemeURI ( jigg:FoiAct2000Vocab )
          ValueString ( "26 Defence" )
          ValueString ( "29 The Economy" ) )
      Statement ( PropertyURI ( jigg:requestHistory )
          ValueString ( "Details of processing the request"  Language ( en-GB ) ) )
      Statement ( PropertyURI ( jigg:responseSummary )
          ValueString ( "The answer" Language ( en-GB ) ) )
      Statement ( PropertyURI ( dcterms:references )
          ValueURI ( <http://www.somewhere.ac.uk/foilogs/02-2006.pdf> ) ) )
#FOIAdmeta
   Description ( ResourceURI( http://www.jigg.ac.uk/foi/ids/1234567-890123)
      Statement ( PropertyURI ( dc:identifier )
          ValueURI ( http://www.jigg.ac.uk/foi/ids/1234567-890123 ) )
      Statement ( PropertyURI ( dc:creator )
          ValueURI ( <http://somewhere.ac.uk> ) )
      Statement ( PropertyURI ( dc:publisher )
          ValueURI ( <http://www.jigg.ac.uk> ) )
      Statement ( PropertyURI (dcterms:modified )
          ValueString ( "2006-09-05"  SyntaxEncodingScheme ( dcterms:W3CDTF ) ) )
      Statement ( PropertyURI ( dc:rights )
          ValueString ( "Copyright Somewhere University 2006" ) )
      Statement ( PropertyURI ( dc:rights )
          ValueURI ( <http://creativecommons.org/licenses/by-nc-nd/2.0/uk/>  ) )
      Statement ( PropertyURI ( dc:rights )
          ValueString ( "The JIGG administrative metadata must always be retained with its
                        associated disclosure log entry description." ) )
      Statement ( PropertyURI ( dc:relation )
          DescriptionRef ( log-1234567-890123 ) ) ) )
```

Figure 1: A DC-Text Example of an FOI Disclosure Log Entry

As an interim stage, a DC-Text [19] hypothetical example was produced to illustrate conformance to the DCAM. DC-Text provides a formal but relatively syntax-free means to document a metadata description set that is ideal

for the development and discussion stage. This DC-Text example, which informed the development of the JIGG FOI XML schema [20], is shown in Figure 1.

3 Results

3.1 Dissemination of FOI Disclosure Log Entries

FOI disclosure log entries stored in the JIGG FOI central database are disseminated over OAI-PMH according to an 'oai_jiggfoi' metadata format. The XML 'metadata' part of a 'GetRecord' response conforms to the JIGG FOI XML schema. Examples are shown in Figures 2 and 3, illustrating different styles of FOI records management by two HEIs, and the use of different properties taken from the Application Profile.

```
<metadata>
 <dcxm:descriptionSet xmlns:dcxm="http://dublincore.org/xml/dc-xml-min/2006/09/18/"
  xmlns:dc="http://purl.org/dc/elements/1.1/" xmlns:dcterms="http://purl.org/dc/terms/"
  xmlns:jigg="http://www.jigg.ac.uk/foi/terms/#" xmlns="http://www.jigg.ac.uk/foi/"
  xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
  xsi:schemaLocation="http://www.jigg.ac.uk/foi/ http://www.jigg.ac.uk/foi/schemas/2006/10/30/jiggfoi.xsd">
  <jigg:foiLog>
   <dc:title>LJMU Review Magazine cost</dc:title>
   <dc:identifier>FOI 5/12</dc:identifier>
   <dc:publisher>Liverpool John Moores University</dc:publisher>
   <jigg:country dcxm:vocabEncSchemeURI="http://www.jigg.ac.uk/foi/terms/#FoiCountryVocab">
    England</jigg:country>
   <dcterms:isPartOf dcxm:valueURI="http://www.ljmu.ac.uk/secretariat/75554.htm"/>
   <jigg:dateReceived dcxm:syntaxEncSchemeURI="http://purl.org/dc/terms/W3CDTF">
    2005-06-07</jigg:dateReceived>
   <dc:description>
    Costs of producing the LJMU Review Magazine and detailed accounts for the Marketing department for
     the previous 5 years
   </dc:description>
   <jigg:infoReleased dcxm:vocabEncSchemeURI="http://www.jigg.ac.uk/foi/terms/#InfoReleasedVocab">
    partial</jigg:infoReleased>
   <jigg:legislation dcxm:vocabEncSchemeURI="http://www.jigg.ac.uk/foi/terms/#FoiLegislationVocab">
    Freedom of Information Act 2000</jigg:legislation>
   <jigg:exemptionsUsed dcxm:vocabEncSchemeURI="http://www.jigg.ac.uk/foi/terms/#FoiAct2000Vocab">
    43 Commercial interests</jigg:exemptionsUsed>
   <jigg:requestHistory>
    LJMU disclosed information on the costs of producing the magazine, although not all the information
    requested was held. LJMU, after applying the public interest test, refused disclosure of the details
    accounts of the Marketing Department, citing Section 43 of the FOIA.
   </jigg:requestHistory>
  </jigg:foiLog>
 </dcxm:descriptionSet>
</metadata>
```

Figure 2: An Example FOI Disclosure Log Entry from Liverpool John Moores University

As required by OAI-PMH, records are also disseminated in simple Dublin Core for interoperability, informed by a mapping from the FOI Application Profile. The administrative metadata is disseminated in simple Dublin Core within an 'about' section of the 'GetRecord' response, an example being shown in Figure 4. Further 'about' sections detail metadata rights according to the OAI-PMH Guidelines for Conveying Rights, and the provenance of any records that have been harvested from elsewhere, conforming to the appropriate OAI-PMH Provenance schema.

```
<metadata>
 <dcxm:descriptionSet xmlns:dcxm="http://dublincore.org/xml/dc-xml-min/2006/09/18/"
  xmlns:dc="http://purl.org/dc/elements/1.1/" xmlns:dcterms="http://purl.org/dc/terms/"
  xmlns:jigg="http://www.jigg.ac.uk/foi/terms/#" xmlns="http://www.jigg.ac.uk/foi/"
  xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
  xsi:schemaLocation="http://www.jigg.ac.uk/foi/ http://www.jigg.ac.uk/foi/schemas/2006/10/30/jiggfoi.xsd">
  <jigg:foiLog>
   <dc:title>Student accommodation landlords</dc:title>
   <dc:publisher>The University of Manchester</dc:publisher>
```

```
    <jigg:country dcxm:vocabEncSchemeURI="http://www.jigg.ac.uk/foi/terms/#FoiCountryVocab">
     England</jigg:country>
    <dcterms:isPartOf dcxm:valueURI="http://www.manchester.ac.uk/aboutus/documents/foi/disclosurelog/"/>
    <jigg:dateReceived dcxm:syntaxEncSchemeURI="http://purl.org/dc/terms/W3CDTF">
     2005-01-05</jigg:dateReceived>
    <dc:description>List of landlords on the student accommodation list</dc:description>
    <dc:subject dcxm:vocabEncSchemeURI="http://www.jigg.ac.uk/foi/terms/#FAMVocab">
     B Student Administration and Support</dc:subject>
    <jigg:infoReleased dcxm:vocabEncSchemeURI="http://www.jigg.ac.uk/foi/terms/#InfoReleasedVocab">
     yes</jigg:infoReleased>
    <jigg:legislation dcxm:vocabEncSchemeURI="http://www.jigg.ac.uk/foi/terms/#FoiLegislationVocab">
     Freedom of Information Act 2000</jigg:legislation>
    <dcterms:references
     dcxm:valueURI="http://www.manchester.ac.uk/medialibrary/foi/disclosures/studentadmin/landlords.pdf"/>
   </jigg:foiLog>
  </dcxm:descriptionSet>
</metadata>
```

Figure 3: An Example FOI Disclosure Log Entry from The University of Manchester

```
<about>
 <oai_dc:dc xmlns:oai_dc="http://www.openarchives.org/OAI/2.0/oai_dc/"
  xmlns:dc="http://purl.org/dc/elements/1.1/" xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
  xsi:schemaLocation="http://www.openarchives.org/OAI/2.0/oai_dc/
   http://www.openarchives.org/OAI/2.0/oai_dc.xsd">
  <dc:creator>http://www.manchester.ac.uk</dc:creator>
  <dc:publisher>http://www.jigg.ac.uk</dc:publisher>
  <dc:date>2007-03-28</dc:date>
  <dc:rights>Copyright The University of Manchester 2005</dc:rights>
  <dc:rights>http://creativecommons.org/licenses/by-nc-nd/2.0/uk/</dc:rights>
  <dc:rights>The JIGG administrative metadata must always be retained with its associated log entry
   description.</dc:rights>
 </oai_dc:dc>
</about>
```

Figure 4: Administrative Metadata for the FOI Disclosure Log Entry of Figure 3.

3.2 Data Creation

Submission of FOI disclosure log entries into the JIGG central database was a significant factor for the project to consider. A Web-form based data Editor allows input of values of the various fields defined by the Application Profile. Use of a dedicated Editor ensures consistency of records, in particular with respect to the various vocabularies, and the generation of valid XML. The design of this system is based on that of the JISC Information Environment Service Registry (IESR) [21], as is the rest of the JIGG FOI application, thus reusing an established application developed as part of another JISC project.

A consideration is obviously the effort required to supply FOI disclosure log entries to JIGG, and the additional steps that may have to be included in existing workflows. It is hoped that use of the JIGG FOI data Editor for log entry submission will not be too onerous. It is thought that the majority of administrative operations within HEIs are based on Excel spreadsheets, thus necessitating 'copy and paste' into the JIGG submission form.

Where possible data fields are populated automatically, which also ensures consistency. For example, the publisher's name will be taken from an HEI's initial registration as a data contributor. Further data congruity is achieved by setting values from vocabulary term lists, such as exemptions, by selection menus within the Editor.

3.3 Data Harvesting

A future vision is automatic population of the central JIGG FOI database of disclosure log entries via OAI-PMH. If an HEI provided a harvest service onto their FOI disclosure logs, using the OAI-PMH standard and the 'oai_jiggfoi' metadata format, JIGG could gather and ingest them on a regular basis. Possibly an HEI could incorporate population of this OAI-PMH enabled database into the process of responding to FOI requests. If they were to publish their FOI disclosure log entries in this way, then submission to JIGG could become automatic.

4 Discussion

4.1 Incorporation into the JIGG Portal

The FOI disclosure logs application is just a part of the JIGG portal. The human user's view of the gateway is controlled by a Content Management System (CMS) to provide a consistent interface to all aspects, informed by a considered information architecture, and implemented by a JIGG-specific template and web style sheet. Thus it is necessary for the web search of the FOI disclosure logs, and their display to end users, to appear within the CMS, rather than as a separate, potentially inconsistent, application provided by the IESR-based implementation. This implies that the web interface to the FOI disclosure log entries will be provided by a server within the CMS. This server will maintain its data records by regularly gathering new records from the separate FOI disclosure logs application. OAI-PMH is the obvious choice for this data interchange, because of its capability for supplying new or changed records on a regular basis after an initial bulk data load.

4.2 Publication of FOI Disclosure Logs

So far this paper has focused mainly on the technical aspects of the JIGG FOI disclosure logs application. But there are, of course, social aspects. As yet few HEIs publish their disclosure logs. This reluctance may be simply because of insufficient staff resource. But there may be a lack of motivation because of a perception that there is no value in sharing this information. Or, further, there may be an active objection because of concerns about accountability.

The project hopes to encourage more HEIs to publish their FOI disclosure logs and to promote their publication in JIGG. One approach will be to hold workshops for HEI records management practitioners who are potential data contributors, to advertise and explain the facility. The JIGG project has engaged with, and has support from, a range of stakeholders, and has several UK regional Advisory Panels consisting of practitioners and representatives from relevant bodies. An 'Information Legislation and Management Survey' of HEIs [22], which portrayed their current handling of FOI requests was recently undertaken by JISC infoNet.

Hopefully, as JIGG is populated with a sizeable corpus of FOI disclosure log entries, the value of such a resource will become apparent. Publishing summaries of information released following FOI requests, and in some cases the full text of responses, will potentially reduce the number of requests for the same information. It will enable HEIs to share their experiences of responding to such requests. It should avoid 'reinventing the wheel' by individual HEIs as they consider aspects of legal compliance that apply to the whole sector. Currently they could potentially give differing responses. Thus the JIGG FOI database should both help to ensure a consistency of response to similar requests, and potentially reduce the resource requirements on records management staff. Essentially JIGG is providing a platform for accumulating and sharing 'frequently asked questions' and their answers.

5 Conclusions

At present these advantages of a central repository of HEI FOI disclosure logs are largely hypothetical. The JIGG project intends to provide the practical infrastructure to realise the vision as the project matures over the next eighteen months. But this does depend on engaging the participation of HEI records management practitioners.

One consideration, mentioned above, is obviously the effort required to supply FOI disclosure log entries to JIGG. The vision is a scenario where HEIs publish their FOI disclosure log entries in an OAI-PMH enabled database, incorporated into their business processes for dealing with FOI requests. JIGG would harvest these disclosure log entries into its central database on a regular basis. The use of OAI-PMH would remove the need for manual effort once the system is in place. But this scenario does imply knowledge of OAI-PMH and technical development capability by the HEI's administration department.

The experience of using an Application Profile within the JIGG project has shown it to be invaluable for developing and formally documenting a metadata schema. It proved to be an ideal format to assemble, communicate and discuss suitable properties during the process of gaining agreement, and for dissemination of the details to other interested parties. This was within a sector where there was not general awareness of metadata schemas and no previous knowledge of OAI-PMH. The Application Profile provides a clear specification even to those who are not conversant with metadata schemas. It affords a relatively 'syntax free'

format understandable by non-technical people. The JIGG FOI Application Profile is a web document, so it includes hyperlinks between various sections and definitions, which hopefully enhance usability by readers. At the same time it is regarded as a formal specification with a persistent URI.

The JIGG project is utilising, and thus disseminating awareness of, OAI-PMH within a new sector. But the marriage of Open Archives and Freedom of Information seems apt. It is envisaged that sharing of FOI disclosure log entries may be broadened to other organisations beyond HEIs, if they adopt the JIGG FOI Application Profile. This interoperability is assisted by using a standards-based approach, in particular by employing OAI-PMH.

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Notes and References

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