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Reuse of the transparency-related information posted on Spanish library and archive websites

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Abstract

This study addresses the types of formats and ease of reuse of transparency-related information available on the websites of 53 national public libraries and 53 provincial historic archives. Further to Spain's Transparency Act, reuse of public sector information is one of the elements comprising the right of access to information. Access and use must consequently be ensured to enable citizens and businesses to reuse all available data. The working methodology deployed here consisted in searching for, identifying and analysing the transparency-related documents carried on library and archive websites and the legal warnings governing their reuse. The findings revealed a wide variety of formats and rules governing reuse and indications of scant interest in these institutions in fostering the transparency and reuse of public information. Even when available, reusable information was normally found to be posted either separately from the data furnished by libraries and archives directly or positioned on pages or sections with complex access paths.

Keywords

Transparency, reuse of information, archives, libraries, websites, Spain

1. Introduction

The provisions of Spanish Act 19/2013 of 9 December on Transparency, Access to Public Information and Good Governance (hereafter cited by its Spanish initials, LTAIPBG) [1] foster the reuse of publicly disclosed information. The act requires the public administration and the institutions under its aegis to post and routinely update certain public information on their websites to guarantee the transparency of their activity. It calls upon those bodies to structure that information 'in clearly understandable terms and preferably in reusable formats' (LTAIPBG, Chap. II, Sect. 5, item 4 and Sect. 11, par. c) [1]. The act itself implies that the existence of a website or electronic portal is imperative to institutional transparency (Ch. II, Sect. 5, item 4): 'Information subject to transparency requirements shall be structured on the respective electronic portals or websites in clearly understandable terms and preferably in reusable formats. Suitable procedures shall be established to ensure the accessibility, interoperability, quality and reuse of the information posted, as well as its identification and position on the site.' Legislation on the reuse of public sector information, in turn, enacted in Spain in the wake of a series of European directives (the most recent in 2019, yet to be transposed into Spanish law), encourages the use of open data and product and service innovation by favouring the reuse of documents held by public bodies such as libraries and archives [2].

All Spain's national public libraries and provincial historic archives have websites where they post information on their services, along in some cases with details on their (institutional and planning) organisation and operation (including applicable legislation, rules of procedure and financial, budgetary and statistical information). Further to the legislation currently in place, that information, whose most prominent characteristics have been analysed in papers determining such institutions' transparency/disclosure practices [3] [4], is subject to private reuse.

Transparency in libraries and archives as bodies under the aegis of the public administration is governed by the specific legislation, which lays down certain obligations in connection with public disclosure. Their institutional purpose, the conservation of documents, in turn, is regulated by the Spanish Act on the Historic Heritage which in Sect. 59.2 defines archives and libraries as documentary and bibliographic heritage institutions. By virtue of that legislation libraries and archives are custodians of an enormous documentary acquis, which further to the aforementioned transparency and reuse requirements must be made publicly available. Both the documents subject to routine institutional operation and administration and the documentary acquis resulting from archivist and library activities are subject to the provisions on transparency and reuse. Transparency is requisite to the reuse of public sector information, although only the information defined as accessible in transparency legislation is reusable. Therefore any analysis of reuse must focus on the existence of transparency-related information and on the legal notices posted on the respective websites where the terms of reuse of the documents in their collections are defined. These preliminary remarks are deemed necessary for, as Martín Delgado [5] notes 'an obvious disconnect can be identified in our body of law in the provisions on informational transparency, accessibility and reuse'.

Given the aforementioned premises, this study purposes to reply to the following research question:

- Is the information posted on Spain's public library and archive websites displayed in formats and under terms of use that facilitate its reuse by citizens and businesses?

2. Review of the literature and applicable legislation

2.1. The reuse of public sector information in European legislation

The reuse of public information is a new development driven by information technologies and the acknowledgement of the right of access to such information. It affords citizens and businesses the opportunity to reuse and add value to that information for commercial and non-commercial purposes. It is, then, the result of information management [6] consisting in administrative processing followed by IT-supported archiving and dissemination in response to citizen demands around transparency in public affairs. The resulting data are subsequently made available to citizens for further processing to generate new information products and services of social and/or economic interest.

Reuse is making documents available for new uses or processing in which public bodies adopt a proactive attitude toward potential users, ensuring the documents are conveniently accessible online. They must also be available upon request, however, as set out in whereas clauses 31 and 34 to European Directive 2019/1024 on open data and the re-use of public sector information [2], along with the metadata required to guarantee interoperability, accessibility and reuse. Further to the directive, reuse is understood as users' ability to employ, modify and share open data and content by accessing a list of the data available, and to acquire reuse rights under copyright licensing arrangements. The FAIR principle [7], referred to on several occasions in the directive as a model, requires data to be findable, accessible, interoperable and reusable (whereas clause 27 to European Directive 2019/1024). Third party intellectual property rights are unaffected by the provisions on reuse (whereas clauses 54 and 55 of the 2019 EU directive), however, whilst

public sector bodies must exercise their copyrights in ways that facilitate reuse. Those premises are not abstract conceits, but the conditions to downloading and using data. They can be found, for instance, on the websites pertaining to the Europeana platform (https://www.europeana.eu/es/search?view=grid&query=), the Spanish Weather Agency (http://www.aemet.es/es/portada), the New York Metropolitan Museum's open access collection (https://www.metmuseum.org/about-the-met/policies-and-documents/open-access) and more discreetly but very clearly in Spain's Official State Journal (https://www.boe.es/informacion/aviso_legal/index.php).

European Union legislation on public sector information reuse is contained in three directives, adopted in 2003, 2013 and 2019 for subsequent transposition into national law. The points below list the regulatory particulars for cultural institutions and briefly describe the most prominent provisions of each of the three directives.

- Directive 2003/98/EC of the European Parliament and of the Council of 17 November 2003 on the re-use of public sector information (now repealed) [8] established no obligation to allow document reuse, leaving the matter to the discretion of the Member State or public sector body concerned (whereas clause 9). The directive did not apply to documents held by cultural, educational or research institutions. It was consequently applicable only to documents made accessible for reuse. It established a minimum set of transparency principle-based rules for reusing public information for commercial or non-commercial purposes. In the event of service charges, it provided that the total income should not exceed costs plus a reasonable return on investment. The directive also invoked the transparency and non-discrimination principle, accordingly stipulating that where exclusive rights were exceptionally granted the reason for their existence had to be disclosed and justified. More generally, the three objectives pursued by the directive included facilitating product and service creation; ensuring the effective use of cross-border documents by private businesses; and limiting distortions of competition [9]. As the 2003 directive was geared not to freedom of information but to the marketplace, it was referenced to Member State access regimes.

- Directive 2013/37/EC of the European Parliament and of the Council of 26 June 2013 amending Directive 2003/98 on the re-use of public sector information (now repealed) [10] included a number of significant additions to the earlier provisions. It provided that reusability should be generally allowed; it defined the scope to cover archives, museums and libraries, including university libraries, subject to specific regulations; it stipulated that charges should in principle be limited to marginal costs; and it required reusable documents to be published in machine-readable formats.

- Directive 2019/1024/EC of the European Parliament and of the Council of 20 June 2019 on open data and the re-use of public sector information (in effect) [2] (hereafter, Open Data Directive) has yet to be transposed into Spanish legislation. Its most prominent new features include extension of the provisions on reuse to research data; real-time access to dynamic data (such as sensors) via suitable technical resources; the inclusion of public enterprises within the scope of the directive; the amendment of the exclusive arrangement regime to handle new types of infringements; the use of exceptions to the principle of marginal cost charges; and the inter-relationship between this legislation and the provisions on environmental information databases. One significant change is the inclusion in the title of the directive of the term 'open data'. In the realm of libraries, archives and museums in particular, open data means allowing persons and private businesses to make digital copies of and reuse information in the public domain.

2.2. Justification of the reuse of transparency-related information posted on Spanish library and archive websites

The rationale for the reuse of public data and documents held by libraries and archives draws, firstly, on that the understanding that such reuse is one of the elements of the right of access to information. Access to and use of publicly disclosed data should therefore be routinely ensured by all public bodies. Reuse should be the rule and any exceptions justified. Inasmuch as documents prepared or held are the targets of that right, reference to the holders should be an instrumental criterion to determine which are reusable and further to which regime, as appropriate. As mentioned earlier, since 2013 the documents generated by libraries and archives have been subject to reusability provisions, whereas the rules applicable to ensuring the availability of the documents they hold in custody are laxer.

The second argument in favour of facilitating reuse is that it ensures compliance with usage and access requirements, namely that documents must be open, readily findable and provided in machine-readable formats with the respective metadata. As a general rule, document reuse is cost-free. Libraries, archives and museums are not bound by that stipulation, however, although they may facilitate unconditional reuse further to the general principle. They may also resort to licensing, which may not be discriminatory, although in libraries and archives it may be cost-free or otherwise. The use of standard licences is recommended, such as the ones in place in heritage institutions, Europeana, for instance. Member States may also facilitate searches for reusable documents by instituting practical arrangements such as document portals or lists. The 2019 directive urges them to establish such practical arrangements to facilitate the conservation of reusable documents.

A third consideration is that cultural institutions, a category that covers libraries and archives, are in possession of two types of documents to which different reuse criteria should be applied. On the one hand, there are what the Open Data Directive calls 'documents held' (by public sector bodies) (sect. 1) [2]. As these elements constitute a collection deemed unique for its content, format, historical significance, origin or expected reuse if digitised, they qualify for application of a specific regime. And on the other, these institutions also have administrative documents of the same type as found in any public sector body or governmental unit, which are subject to transparency legislation. Such documents, containing information on the budget, staff or service use statistics, are subject to general access and (cost-free) reuse. Further to transparency legislation, cultural institutions - from municipal music schools to national libraries - must furnish such information.

Fourthly, all existing documents subject to general reuse provisions 'held by public sector bodies of the Member States' must be reusable. Inasmuch as the directive makes specific provision for documents held in custody by libraries and archives, the following criteria must be borne in mind to determine when reusability is mandatory.

a) Documents generated by public cultural institutions whose content is geared to guaranteeing the transparency and control of their public activity are subject to the general provisions.

b) Documents collected by libraries, including university libraries, museums and archives, in the fulfilment of their service mission qualify for specific regime arrangements.

c) The reusability of research data obtained with public funding and on record in cultural institutions is also governed by a specific regime. In contrast, document reusability is not required of either research institutions or the organisations funding or conveying their findings. That stipulation applies to the activities and documents of cultural institutions acting as part of a research system (state archives, museums…).

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Fifthly, specific library and archive regimes apply to charges for reusable content, the regulation of exclusive arrangements, document digitisation and the availability of high value datasets. In all other respects, libraries and archives making reusable content available to users must abide by the general regime. Further to whereas clause 9 of the 2003 directive, the provisions of that legislation are applicable to documents made accessible for reuse when public sector bodies 'license, sell, disseminate, exchange or give out information'

Lastly, even where subject to the general requirements on document reusability, libraries and archives may exclude the reuse of the following documents when held in custody.

a) Documents for which third parties hold intellectual property (or similar or *sui generis*) rights, as well as those held by public service broadcasters for the fulfilment of a public service broadcasting remit.

b) Information and documents not covered by the body's public service remit and documents exempt from mandatory access further to Member State access legislation.

c) Information to which access is barred by law for reasons including national security, commercial confidentiality or personal data protection. In the third case, the directive envisages the possibility of anonymising documents, although the cost must be assumed by reusers.

3. Methodology

This study forms part of a nationwide research project on the assessment of Spanish archive and library transparency practice. It seeks to ascertain the types of formats and reuse facilities afforded for transparency-related information accessible on the websites published by Spain's national public libraries (hereafter, NPLs) and provincial historic archives (hereafter PHAs). An over-arching project still underway, it also covers Spanish public university libraries and archives. Earlier results on PHAs and NPLs have also been published [11] [12].

The universe chosen to assess such transparency-related information and the convenience of data and document reuse included Spain's 53 NPLs, all of which are administered by the respective regional governments or the cities of Ceuta and Melilla. These institutions are of particular significance for the country's cultural development and citizens' access to information. Generally speaking, each is the main library in the city of their location and their impact on national library activity is acknowledged. The universe also included the country's 52 PHAs, hierarchically subsidiary to the national government but administered regionally. The Royal and General Archive under the aegis of the region of Navarre was likewise included in this group, for it shares many of the duties most characteristic of such institutions [13]. The PHAs are custodians of what are deemed to be permanently conserved documents produced by nationally and regionally peripheral public administrations [14]. Those two sets of institutions were chosen because, with the exception of the archive at Navarre, they have the same operational and administrative status in the central administration. In addition, all these archives and libraries hold a significant portion of Spain's documentary heritage, whose access and reusability by all citizens for their own benefit must be guaranteed, further to one of the primaries aims of Spain's Historic Heritage Act [15].

The fieldwork involved in the study included accessing these institutions' websites from the Ministry of Culture and Sports' site. For the archives, the access path started at the link entitled 'Archivos de titularidad estatal gestionados por las Comunidades Autónomas' [regionally administered national archives] (https://www.culturaydeporte.gob.es/cultura/archivos/informacion-general/gestion-autonomica.html) and for libraries at the page 'Panorámica de las 53 bibliotecas públicas del

Estado' [overview of the 53 national public libraries] (http://mapabpe.mcu.es/mapabpe.cmd?command=GetMapa). The archives and libraries whose websites were searched for information on transparency are listed in Annexes I and II, along with the respective URLs.

Transparency-related information was sought in a first stage on the grounds of a series of indicators forming part of a tool denominated TransPa_BA [16]. The tool was inspired by methodology for assessing and monitoring transparency (Spanish initials, MESTA) developed by Spain's Transparency and Good Governance Council, the institution that enforces the LTAIPBG. The transparency indicators (20 for libraries and 22 for archives) were grouped under eight areas or headings: 1) purpose of the service and objectives pursued; 2) governing bodies and operating rules; 3) service offering; 4) the collection; 5) staff; 6) results; 7) financial information; and 8) partnering / cooperation. The term indicator is understood to mean a unit of information (document, data or symbol) whose assessment can attest to or appraise achievements and changes in transparency. The information is assessed under each indicator in keeping with a series of parameters: four dealing with the information itself and its disclosure (content, form, dating and updates) and two with its quality (accessibility and reusability). Each indicator can be attributed a maximum score of 50, with each parameter allotted either 10 points (if present or present in a given way) and 0 otherwise. Exceptionally, the parameter on accessibility was scored on a scale of 0 to 10. Dating and updates, in turn, were assigned a maximum score of 5 each, given that while initially pooled, they were subsequently segregated for more detailed analysis.

TransPa_BA								
	Presentation of active public disclosure on the website of the archive or library							TOTAL SI/NO
							PARAMETERS	
	ACTIVE PUBLIC DISCLOSURE INDICATORS	CONTENT	FORM	REUSABILITY	ACCESIBILITY	DATE	UPDATES	
1	PURPOSE OF THE SERVICE AND OBJECTIVES PURSUED							
1.1	Definition of mission							
1.2	Strategic plan							
	TOTAL AREA 1							
2	GOVERNING BODIES AND OPERATING RULES							
2.1	Identity of library's or archive´s management board members							
2.2	Regulations							
2.3	Specific regulations on service provision							
2.4	Code of ethics, values or good practice							
	TOTAL AREA 2							
3	SERVICE OFFERING							
3.1	User charter							
	TOTAL AREA 3							
4	THE COLLECTION							
4.1	Collection /Document management policy or programme							
4.2	Document classification chart (Archives only)							
4.3	Conservation calendar (Archives only)							
4.4	Institutional access policy (University Libraries only)							
	TOTAL AREA 4							
5	STAFF							
5.1	Organisational chart							
5.2	Staff directory							
	TOTAL AREA 5							
6	RESULTS							
6.1	Management indicators (scoreboard)							
6.2	User satisfaction surveys							
6.3	Annual report or report of activities							
6.4	Distinctions, prizes, certifications							
6.5	Statistics							
	TOTAL AREA 6							
7	FINANCIAL INFORMATION							
7.1	Budget implemented							
7.2	Tenders, contracts and bidding							
7.3	Subsidies and assistance awarded							
	TOTAL AREA 7							
8	PARTNERING / COOPERATION							
8.1	Partnering networks, task forces, commissions							
8.2	Agreements							
	TOTAL AREA 8							
	TOTAL AREAS							
	TOTAL ACTIVE PUBLIC DISCLOSURE							

Table I. Indicators and parameters appraised by the active disclosure measurement tool TransPa_BA

The parameter 'reuse', the object of this study, was scored as 0 or 10, rather than on a scale, given the differences and ongoing flux of opinions expressed in this regard since the Berners Lee [17] put forward the proposal on open data. A score of 10 was awarded for structured formats (xls, csv, xml) i.e., those requiring no extra techniques or effort for document reuse. Acrobat pdf format was not deemed reusable in light of the criticism levelled at the tool in connection with transparency [18], despite its extensive use on the Datos.gob.es site, the platform that catalogues the open data available in Spain. Although pdf was deemed a valid format for public disclosure, its inconvenient editing constitutes an obstacle to reuse. As Camacho [19] noted, 'pdfs should be furnished in conjunction with reusable formats: xml, csv, xls, doc…'.

The applicability of this parameter might well be thought to be limited to the indicators defined by quantitative data such as statistics to the exclusion of other information located in the searches. As the type of reuse intended for these documents was unknown, however, and bearing in mind that some are the object of analysis (annual reports [20], strategic plans [21], collection policies and plans [22] and user charters [23]), all the indicators were assessed for reusability.

In another vein, the legal notices posted on archive and library websites specifying the conditions governing information reuse were also reviewed [24]. As discussed in a later section, on the grounds of the findings, institutions were classified under three headings: libraries or archives with no mention of reuse on their sites; institutions explicitly prohibiting document reuse based on content protection under intellectual property legislation; and those allowing reuse, although not all of the ones in this category specify the terms of such reuse in their legal notices [25][26].

The transparency-related information and the terms of its reuse posted on the websites of the libraries and archives targeted in this study were searched and analysed in March and April 2021.

4. Results

The paragraphs below summarise the findings of the searches and analyses conducted to determine the formats in which transparency-related information is given and the terms of reuse set out on NPL and PHA websites.

4.1. Formats used to display the information

The formats used to display the 285 documents or information elements found on the 53 NPL websites and the 229 on the 53 PHA websites and identified as transparency-related items are listed in Table II. The data on formats given in the table provide an indication of document reusability.

Indicators formats	AH	BP
html	**92**	**199**
1.1 Definition of mission	13	25
2.3 Specific regulations on service provision	13	40
2.4 Code of ethics, values or good practice		6
4.1 Collection /Document management policy or programr	1	
4.2 Document classification chart (Archives only)	19	
5.2 Staff directory	10	30
6.5 Statistics	2	26
7.1 Budget implemented		21
8.1 Partnering networks, task forces, commissions	34	51
html/pdf	**16**	**19**
1.1 Definition of mission		3
2.2 Regulations		3
2.3 Specific regulations on service provision		5
3.1 User Charter		8
4.2 Document classification chart (Archives only)	7	
4.3 Conservation calendar (Archives only)	9	
pdf	**103**	**66**
1.1 Definition of mission	10	11
1.2 Strategic plan		4
2.2 Regulations	1	19
2.3 Specific regulations on service provision	7	5
2.4 Code of ethics, values or good practice	1	1
3.1 User Charter	19	13
4.1 Collection /Document management policy or programr	3	
4.2 Document classification chart (Archives only)	21	
5.1 Organisational chart	1	
6.1 Management indicators (scoreboard)	6	2
6.2 User satisfaction surveys	5	3
6.3 Annual report or report of activities	10	4
6.4 Distinctions, prizes, certifications		1
6.5 Statistics	16	3
7.1 Budget implemented	1	1
8.1 Partnering networks, task forces, commissions	1	
pdf/xml	**2**	
4.2 Document classification chart (Archives only)	2	
xls/csv, json, xml	**9**	
6.5 Statistics	9	
xls/pdf	**7**	
6.5 Statistics	7	
Total	**229**	**285**

Table II. Formats in which transparency indicator-related information is displayed on NLP and PHA websites

Although scarce, reusable formats were present on some archives' sites. The formats most commonly found for the transparency indicators were pdf and html, in that order. Of the **229** documents or information elements associated with the indicators, only 11 were displayed in reusable formats. As Table II shows, in two cases the information displayed consisted in collection classification charts and in the other nine in statistics. Criticism has occasionally been levelled at PHA sites in connection with the leanness of the statistics furnished and the implications of such constraints for transparency [27].

The statistics posted by the archives in the region of Castile-Leon are displayed in xls and csv formats. The upper toolbar on their sites contains a link denominated 'Actividades y recursos' [activities and resources], which affords access to another, 'Datos abiertos de archivos' [archives' open data]. The latter contains basic data on all the region's archives in the aforementioned downloadable xls and csv formats. Similarly, a link on the PHA websites in the region of

Andalusia, 'El archivo en cifras' [archive facts and figures] opens a page containing the statistics on archives posted by the Regional Department of Culture and Heritage in xls and pdf format. The two exceptions in this case are the provincial archives in Malaga and Granada, whose sites have no such link, even though they are patterned to the same model (with this and other minor variations) as the other provincial institutions in the region.

Another exception in connection with reusable formats was found on the Zaragoza and Huesca archives' websites, the only two in the region of Aragon displaying a link to DARA (the regional document and archive portal) where the organisational charts for their collections are posted, in this case in xml format.

Not a single document of the **285** found on library websites was displayed in a clearly reusable format. The two most common formats found here were html (199) and pdf (67), with some libraries furnishing information in both (19). The absence of statistics in reusable xls format is surprising, although the availability of spreadsheets on request cannot be ruled out. Here also an exception to the general rule for library sites was observed in the libraries in Castile-Leon, which posted reusable, albeit ambiguously positioned, information. Those nine public libraries carried an icon on their sites (a scantly visible letter 'B' in the upper right corner) that opened the Castile-Leon regional library network's page. A link at the bottom of that page entitled 'Datos estadísticos' [statistical data] then opened a third page with a link to the regional government of Castile-Leon's annual report containing data on libraries, archives and museums in reusable xls format. Such a path to the statistical data from the library's own site can only be described inordinately complex. A further complication observed was that none of the libraries in the region with a link (entitled 'La biblioteca en cifras' [library facts and figures]) to a page listing their own statistics posts one for the aforementioned regional site. They do link to the Ministry's site, however, where more detailed statistical data are posted for each individual institution. Those findings would appear to infer scant institutional interest in enabling citizens to access such statistics and even less in facilitating their reuse.

4.2. Terms of reuse of information accessible from archive and library websites

The results of the search for and, when found, analysis of the terms of reuse contained in the legal notices on the websites of the archives and libraries comprising the universe studied are summarised below.

Three situations were observed for the 53 PHAs.

a) The archives in two regions, the Balearic Isles and Extremadura, were found to specify no terms or legal notice.
b) Site contents subject to copyrightthe most common of the three situations observed, was the condition stipulated in the PHAs of Andalucía, Aragón, Canary Islands, Cantabria, Castile-Leon, Madrid, Murcia and Valencia.
c) Four regions' PHAs (Castile-La Mancha, Catalonia, Galicia and La Rioja) acknowledged or facilitated reuse, attesting to their embrace of the culture of reuse.

The 53 NPLs analysed were grouped under three similar headings.

a) No legal notice on reuse or copyright was found on the websites posted by the NPLs in Aragón, Asturias, Cantabria, Ceuta, La Rioja, Melilla and Valencia.
b) Statements on copyright protection for website content, attributed to the owner of the site, were found on the NPLs in the Balearic Isles, Basque Country, Canary Islands, Castile-Leon, Madrid and Murcia.
   Further to such statements, all rights are reserved and access to the data is subject to specific request. The most striking instance was observed on the model site used by all

the Castile-Leon libraries. While each posts a link to 'open data' (https://datosabiertos.jcyl.es/web/es/datos-abiertos-castilla-leon.html), the page shared by regional libraries and archives specifies that the regional Government reserves all rights to website content and conditions its reproduction to explicit authorisation. Such contradictory terms would not appear to favour reusability. The same situation was identified on the websites of the region's archives, where the legal notice is identically worded (https://bibliotecas.jcyl.es/web/jcyl/BibliotecaLeon/es/Plantilla100Detalle/12843474675 67/Texto%20Generico/1246989714819/Texto). In contrast, the terms of reuse listed in the legal notice on the archives' open data page are ideal (https://datosabiertos.jcyl.es/web/jcyl/RISP/es/Plantilla100Detalle/1284162055979/Text o%20Generico/1284162985246/Texto).

c) Only four regions' NPL websites acknowledged reuse: Andalusia, Castile-La Mancha, Catalonia and Galicia.

Andalusian libraries envisage freedom of use and reuse of the texts for which they hold intellectual property rights subject to Creative Commons (CC) licence and the reusability terms set out in Royal Decree 1495/2011, which supplements the provisions of Act 37/2007 on reuse of national public sector information. Their websites contain no list of reusable data, however. Similarly, the libraries in Castile-La Mancha allow reuse further to Act 37/2007 but fail to specify the documents to which it applies. The same situation was found in Catalonia, except that there the right of reuse is based on regional legislation (Act 19/2014). The legal notices on the websites of both the archives and libraries in the region of Galicia, in turn, state that the information contained on the site us reusable except as explicitly specified otherwise.

The situation described in connection with both reusable formats and the terms of reuse reveals the presence of widely diverse criteria and the general absence of interest in furthering the transparency and reusability of the public information posted by these institutions. Even when some interest could be discerned (such as in Castile-Leon, with excellent open access resources), the reusable information was posted on websites other than those pertaining to libraries and archives themselves.

In practice and even where they cite reusability legislation, none of the 53 national public libraries, with the sole exception of those in Castile-Leon, engages directly in activities geared to reuse or posts lists or pages with specific data for users. Generally speaking, that may be largely due to the fact that the Ministry of Culture itself devotes no space to disseminating a culture of reuse in its legal notices or other elements on its website. The National Library is the only national institution that engages in activities along those lines (http://www.bne.es/webdocs/LaBNE/Transparencia/Institucional/plan_risp_bne.pdf).

The legislation on reuse is seldom cited on the sites analysed and when it is, the reference is to the 2007 act, soon to be repealed. Neither that act (supplemented by a royal decree, RD 1497/2011, published in 2011) nor its 'parent', the 2003 European Directive, stipulates mandatory reusability of the documents found in libraries, archives or museums. No mention was found of the inclusion of libraries and archives in reusability legislation or of the regime specific to those institutions laid down in the 2013 provisions (transposed to Spanish law as Act 18/2015) and maintained in the 2019 directive, yet to be transposed into the Spanish body of law. None of the sites analysed contained any reference to citizen reusability authorised in the 2013 directive and the domestic legislation enacted in 2015, and much less to the specific regime applicable to libraries (including university libraries), archives and museums.

5. Conclusions

Based on the findings described above, the reply to the question that guided this study is that neither the formats used to display transparency-related information nor the legal notices on NPL and PHA websites facilitate the reuse of their content. That the most commonly used formats are pdf and html is an indication of weak-to-non-existent in displaying transparency. In light of the present findings, archives and libraries might be advised to publish their documents in more than one format. The pdf option, which is useful given its ready readability and printability, might be supplemented with formats such as xhtml or xml that allow for information reuse for other purposes. Such a practice would make information not only available in a number of formats but also directly accessible with the search and filtering tools recommended by some authors to meet transparency requirements [18].

Throughout this study the searches for transparency indicators were observed to yield patchy results, in which the scant information identified proved difficult to access due to its scatter across numerous pages and position at the end of an inordinate number of links. Both NPLs and PHAs would be well advised to create specific sites carrying open data and ready access to the digitised documents in their custody, which could then be made available to users for consultation and reuse. Such websites would be the ideal place to facilitate content reuse via links, lists or other practical arrangements favouring document searches. Any information so retrieved should also include the respective metadata as stipulated in the Open Data Directive [2] (Sect. 9) and further to present practice in some libraries and archives [28].

The impetus of certain regional cultural bodies should be assessed against the backdrop of such narrow opportunities for reuse of the information furnished by the institutions analysed here. In certain instances that attitude apparently contradicts policies denying access to documents (administrative or held in custody) implemented by others of a given regional government's bodies. In other cases, the opposite may occur regional government urging may not suffice to prompt cultural institutions to adopt the reusability principle.

The specifics inferred by the foregoing cannot be readily identified, for national libraries and historic archives managed by regional authorities would appear to live a 'double life', with websites in some cases that can be accessed in different manners. The regional departments entrusted with the management of the institutions analysed here should inexcusably adopt active reuse policies applicable to these NLPs and PHAs. Although some statistics on library and archive activity could be accessed in this study, the paths to reach those data were far from ideal. Even more difficult to identify was any central government or ministerial corporate strategy for these institutions, which should champion common values and shared policies such as reuse throughout the country to guide the dissemination and highlight the value of public sector information.

Studies on library and archive transparency such as conducted by Cobo-Serrano, Ramos-Simón and Arquero-Avilés [29] have revealed scant progress in the central government's endorsement of reuse, stressing the need to define clear and uniform inter-ministerial policies. Perpinyà and Cid-Leal [30], in turn, analysing Spanish archive websites from the perspective of transparency and user friendliness, detected 'the need for the respective institutions to commit more firmly to developing such sites and in general to capitalising on the potential of the internet to disseminate information on the heritage and enhance transparency'. That perception goes unchanged in the present analysis of reuse of the public information generated by PHAs and NPLs, a domain found to still be scantly explored

The national administration might do well to establish a common transparency and document reuse policy for these cultural institutions.

The ability to reuse the public sector information in the possession of NPLs and PHAs depends quite obviously on its accessibility. The LTAIPBG appears to have made very little headway in that regard since its enactment nearly 10 years ago.

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Annexes

Historic Archives	web URL
Álava	https://gida.irekia.euskadi.eus/es/entities/1522-archivo-historico-provincial-alava
Alicante	http://ceice.gva.es/es/web/archivo-historico-provincial-alicante
Albacete	https://cultura.castillalamancha.es/archivos/archivos-historicos-provinciales/archivo-historico-provincial-de-albacete
Almería	http://www.juntadeandalucia.es/cultura/archivos/web_es/ahpalmeria
Asturias	https://archivosdeasturias.info/feaa/action/portada?buttons%5b0%5d=new
Ávila	https://archivoscastillayleon.jcyl.es/web/es/nuestros-archivos/archivo-historico-provincial-avila.html
Badajoz	http://archivosextremadura.gobex.es/WAREX/live/SistemaArchivistico/JuntaExtremaduraSA/ArchivosHistoricoProvinciale sSA/ArchivosHistoricoProvincialesBA.html
Bizcaia	https://gida.irekia.euskadi.eus/es/entities/1523-archivo-historico-provincial-bizkaia
Burgos	https://archivoscastillayleon.jcyl.es/web/jcyl/ArchivosCastillaYLeon/es/Plantilla66y33_100/1284346752633/_/_/_
Cáceres	http://archivosextremadura.gobex.es/WAREX/live/SistemaArchivistico/JuntaExtremaduraSA/ArchivosHistoricoProvinciale sSA/ArchivosHistoricoProvincialesCC.html
Cádiz	http://www.juntadeandalucia.es/cultura/archivos/ahpcadiz
Cantabria	https://www.culturadecantabria.com/es/archivo-historico
Castellón	http://ceice.gva.es/es/web/archivo-historico-provincial-de-castellon
Cervera	https://xac.gencat.cat/ca/llista_arxius_comarcals/segarra/diposit_arxius_cervera/
Ciudad Real	https://cultura.castillalamancha.es/archivos/archivos-historicos-provinciales/archivo-historico-provincial-de-ciudad-real
Córdoba	http://www.juntadeandalucia.es/cultura/archivos/ahpcordoba
Cuenca	https://cultura.castillalamancha.es/archivos/archivos-historicos-provinciales/archivo-historico-provincial-de-cuenca
Girona	https://xac.gencat.cat/ca/llista_arxius_comarcals/girones/
Granada	http://www.juntadeandalucia.es/cultura/archivos/web/contenido?id=0754eda0-58a4-11dd-b44b-31450f5b9dd5&idArchivo=0754eda0-58a4-11dd-b44b-31450f5b9dd5
Guadalajara	https://cultura.castillalamancha.es/archivos/archivos-historicos-provinciales/archivo-historico-provincial-de-guadalajara
Guipuzkoa	http://oinati.gipuzkoakultura.eus/
Huelva	http://www.juntadeandalucia.es/cultura/archivos/ahphuelva
Huesca	http://www.patrimonioculturaldearagon.es/archivo-historico-provincial-de-huesca
Jaén	http://www.juntadeandalucia.es/cultura/archivos/ahpjaen
La Rioja	https://www.larioja.org/archivo-historico/es
Las Palmas de Gran Canaria	http://www.gobiernodecanarias.org/cultura/archivolaspalmas/
León	https://archivoscastillayleon.jcyl.es/web/es/nuestros-archivos/archivo-historico-provincial-leon.html
Lleida	https://xac.gencat.cat/ca/llista_arxius_comarcals/segria/
Lugo	http://arquivosdegalicia.xunta.gal/portal/arquivo-historico-provincial-de-lugo/index.html
Maó	http://www.bibliomao.es/ca/arxiu-historic
Málaga	http://www.juntadeandalucia.es/cultura/archivos/ahpmalaga
Melilla	https://www.melilla.es/melillaPortal/contenedor.jsp?seccion=s_floc_d4_v1.jsp&codbusqueda=210&language=es&codRe si=1&codMenuPN=601&codMenuSN=5&codMenu=162&layout=contenedor.jsp
Murcia	https://archivogeneral.carm.es/archivoGeneral/arg.inicio
Ourense	http://arquivosdegalicia.xunta.gal/portal/arquivo-historico-provincial-de-ourense/index.html
Palencia	https://archivoscastillayleon.jcyl.es/web/jcyl/ArchivosCastillaYLeon/es/Plantilla66y33_100/1284346754651/_/_/_
Pontevedra	http://arquivosdegalicia.xunta.gal/portal/arquivo-historico-provincial-de-pontevedra/index.html
Protocolos de Madrid	http://www.madrid.org/archivos/index.php/quienes-somos/conocenos/archivo-historico-de-protocolos
Real Chancillería de Granada	http://www.juntadeandalucia.es/cultura/archivos/web_es/realchancilleria
Real y General de Navarra	http://www.navarra.es/home_es/Temas/Turismo+ocio+y+cultura/Archivos/Archivos/Archivo+General+de+Navarra/
Reino de Galicia	http://arquivosdegalicia.xunta.gal/portal/arquivo-do-reino-de-galicia/
Reino de Mallorca	http://arxiuregnemallorca.com/
Reino de Valencia	http://ceice.gva.es/es/web/archivo-del-reino
Salamanca	https://archivoscastillayleon.jcyl.es/web/jcyl/ArchivosCastillaYLeon/es/Plantilla66y33_100/1284346754696/_/_/_
Santa Cruz de Tenerife	http://www.gobiernodecanarias.org/cultura/archivosantacruzdetenerife/
Segovia	http://archivoscastillayleon.jcyl.es/web/jcyl/ArchivosCastillaYLeon/es/Plantilla66y33_100/1284346754743/_/_/_
Sevilla	http://www.juntadeandalucia.es/cultura/archivos/ahpsevilla
Soria	https://archivoscastillayleon.jcyl.es/web/es/nuestros-archivos/archivo-historico-provincial-soria.html
Tarragona	https://xac.gencat.cat/ca/llista_arxius_comarcals/tarragones/
Teruel	http://www.patrimonioculturaldearagon.es/archivo-historico-provincial-de-teruel
Toledo	https://cultura.castillalamancha.es/archivos/archivos-historicos-provinciales/archivo-historico-provincial-de-toledo
Valladolid	https://archivoscastillayleon.jcyl.es/web/es/nuestros-archivos/archivo-historico-provincial-valladolid.html
Zamora	http://www.jcyl.es/web/jcyl/Portada/es/Plantilla100Directorio/1248366924958/0/1142233579265/DirectorioPadre
Zaragoza	http://www.patrimonioculturaldearagon.es/archivo-historico-provincial-de-zaragoza

Annex I - Website URLs for the provincial historic archives studied

State-run Public Libraries	web URL
A Coruña	https://bibliotecas.xunta.gal/coruna/
Albacete	https://www.bibliotecaspublicas.es/albacete
Almería	http://www.bibliotecasdeandalucia.es/web/biblioteca-del-estado-publica-provincial-de-almeria
Ávila	https://bibliotecas.jcyl.es/web/jcyl/BibliotecaAvila/es/Plantilla100/1284347540032/_/_/_
Badajoz	https://www.bibliotecaspublicas.es/badajoz
Burgos	https://bibliotecas.jcyl.es/web/jcyl/BibliotecaBurgos/es/Plantilla100/1284353929655/_/_/_
Cáceres	https://www.bibliotecaspublicas.es/caceres/
Cádiz	http://www.bibliotecasdeandalucia.es/web/biblioteca-del-estado-publica-provincial-de-cadiz
Castellón	https://www.bibliotecaspublicas.es/castellon/index.jsp
Ceuta	https://www.ceuta.es/ceuta/informacion-biblioteca/informacion-biblioteca
Ciudad Real	http://reddebibliotecas.jccm.es/intrabibl/index.php/inicio-bpe-cr
Córdoba	http://www.bibliotecasdeandalucia.es/web/biblioteca-del-estado-publica-provincial-de-cordoba/
Cuenca	https://www.bibliotecaspublicas.es/cuenca/index.jsp
Gijón	https://www.bibliotecaspublicas.es/gijon
Girona	https://bibliotecagirona.gencat.cat/ca/inici
Granada	http://www.bibliotecasdeandalucia.es/web/biblioteca-del-estado-publica-provincial-de-granada
Guadalajara	https://www.bibliotecaspublicas.es/guadalajara/
Huelva	http://www.bibliotecasdeandalucia.es/web/biblioteca-del-estado-publica-provincial-de-huelva
Huesca	https://www.bibliotecaspublicas.es/b-huesca
Jaén	http://www.bibliotecasdeandalucia.es/web/biblioteca-del-estado-publica-provincial-de-jaen
Las Palmas de Gran Canaria	https://www.bibliotecadecanarias.org/las-palmas
León	https://bibliotecas.jcyl.es/web/jcyl/BibliotecaLeon/es/Plantilla100/1284347467567/_/_/_
Lleida	https://bibliotecalleida.gencat.cat/ca/inici
Logroño	http://www.blr.larioja.org/
Lugo	https://bibliotecas.xunta.gal/lugo/
Madrid	http://www.madrid.org/cs/Satellite?cid=1343065588822&language=es&pagename=PortalLector%2FPage%2FPLEC_contenidoFinalNavegable
Maó	http://www.bibliomao.es/
Málaga	http://www.bibliotecasdeandalucia.es/web/biblioteca-del-estado-publica-provincial-de-malaga
Melilla	https://www.melilla.es/melillaPortal/contenedor.jsp?seccion=s_floc_d4_v1.jsp&codbusqueda=207&language=es&codResi=1&codMenuPN=601&codMenuSN=5&codMenu=159&layout=contenedor.jsp
Mérida	https://www.bibliotecaspublicas.es/merida/
Murcia	https://bibliotecaregional.carm.es/
Ourense	https://bibliotecas.xunta.gal/ourense/
Orihuela	https://www.bibliotecaspublicas.es/orihuela
Oviedo	https://www.bibliotecaspublicas.es/oviedo/index.jsp
Palencia	https://bibliotecas.jcyl.es/web/jcyl/BibliotecaPalencia/es/Plantilla100/1284355840201/_/_/_
Palma de Malorca	https://www.bibliotecapalma.com/index.php/ca/
Pontevedra	https://bibliotecas.xunta.gal/pontevedra/
Salamanca	https://bibliotecas.jcyl.es/web/jcyl/BibliotecaSalamanca/es/Plantilla100/1284353878191/_/_/_
Santa Cruz de Tenerife	https://www.bibliotecadecanarias.org/santa-cruz-de-tenerife
Santander	https://bcc.cantabria.es/
Santiago de Compostela	https://bibliotecas.xunta.gal/santiago/
Segovia	https://bibliotecas.jcyl.es/web/jcyl/BibliotecaSegovia/es/Plantilla100/1284347869361/_/_/_
Sevilla	http://www.bibliotecasdeandalucia.es/web/biblioteca-del-estado-publica-provincial-de-sevilla
Soria	https://bibliotecas.jcyl.es/web/jcyl/BibliotecaSoria/es/Plantilla100/1284347458759/_/_/_
Tarragona	https://bibliotecatarragona.gencat.cat/ca/inici
Teruel	https://www.bibliotecaspublicas.es/bpteruel
Toledo	https://biblioclm.castillalamancha.es/
Valencia	https://www.bibliotecaspublicas.es/valencia_val/index.jsp
Valladolid	https://bibliotecas.jcyl.es/web/jcyl/BibliotecaCastillaYLeon/es/Plantilla100/1284316773345/_/_/_
Vitoria-Gasteiz	https://web.araba.eus/es/cultura/casa-cultura-ignacio-Aldecoa
Zamora	https://bibliotecas.jcyl.es/web/jcyl/BibliotecaZamora/es/Plantilla100/1284348193872/_/_/_
Zaragoza	https://www.bibliotecaspublicas.es/bpz

Annex II - Website URLs for the national public libraries studied