

April 2004 Newsletter

Welcome to the Act Now Newsletter on Data Protection, Freedom of Information, Privacy and Information Management issues in the Public Sector. 1,893 subscribers on 04/04/04. Next newsletter July 2004.

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If you're looking for training in information law we can provide it. We offer courses at venues throughout the UK including Scotland, Wales and Northern Ireland. We frequently have speakers from the Information Commissioner's office delivering the keynote address. We offer courses on

- Data Protection
- Freedom of Information
- Regulation of Investigatory Powers
- Records Management
- Single Point of Contact Accreditation

And a **new** addition to our Spring programme is

- Information Security & BS7799 for the public sector in London and York

with a new Consultant, Andrea Simmons, whose biography can be read at www.actnow.org.uk

Details of all our training courses can be found at www.actnowtraining.co.uk

In this issue

Act Now approved by Home Office

- Government plans more changes to RIPA
- Councils face test from Campaign
- Act Now wins NI Tender
- 3 Surveys of readiness
- FOI and Politicians
- Guidance notes on Exemptions from ICO
- Scottish Act News
- DP

- MEPs threaten action

- Durant killed the video star
- REGIONAL GROUPS & NATIONAL ORGANISATIONS

www.actnow.org.uk for a further list of clients and testimonials.

Belfast Courses this year include RIPA (April 28th) and Freedom of Information (June 14th) Both at Wellington Park Hotel.

See www.actnowtraining.co.uk for details

Central Governments: FOI Survey

The Information Commissioner has undertaken a survey into how prepared central government departments are for the full implementation of the Freedom of Information (FOI) Act in January 2005. The survey of all 17 central government departments, found that:

- All departments have placed their publication schemes on their website
- All departments reported existing and/or planned FOI training to raise awareness and provide guidance for staff
- The majority of departments have established cross departmental groups to manage FOI implementation
- Most departments indicated that board level responsibility had been taken for implementation of the Act

Details of Central Government survey [here](#), A separate report details the findings relating to Northern Ireland [here](#) and Local Government was also examined. [here](#). E-Gov Monitor was quite critical of the conclusions.

However despite today's statements from the ICO, buried away in the 72-page report is the remark: "Most local authorities responded in August or September 2003 and it is certainly the case that many will now be considerably further advanced in their preparations".

"Different local authorities may have chosen to highlight different elements of their approaches to FOI", it adds. "On occasions some may not have provided information which the Commissioner might have regarded as significant."

The report continued, "Although the response rate was good, it may be fair to conclude that those with a better story to tell may have been more likely to respond" - raising questions as to why it is drawing broad conclusions from the selected sample.

MPs fear criticism over excessive expenses claims. Daily Telegraph 2nd February 2004

"MPs are preparing for a blitz of bad publicity this year when individual details of their £100,000-plus expenses are published for the first time. In order to comply with the Freedom of Information Act, the House of Commons will reveal the exact amount claimed in parliamentary allowances by every MP." This could be the shape of things to come for local politicians. Have your councillors been briefed on the implications of FOI for their working practices?

See full [story](#)

Issue of the week: Freedom of information The Times. March 16, 2004

Public sector archives: 'a publicity minefield'. One of the "greatest pieces of legislation to affect the public sector in many years" is soon to come into effect - but glaring gaps in preparedness may mean dirty secrets will return to haunt organisations. That is PR Week's (March 12) assessment of the public sector's readiness for the Freedom of Information Act, which comes into force on January 1 next year. It fears that phones will be "ringing off the hook" in public authorities as members of the public and journalists demand their right to access to the written records they hold.

See full [story](#)

FOI to cause Mass Confusion in councils - Computer Weekly

See full [story](#)

FOI and Politicians

Another story foretells what effect FOI is going to have on politicians and their activities.

The parliamentary ombudsman has forced Tony Blair to reveal his pattern of meetings with commercial lobbyists. This has been a fiercely preserved Downing Street secret, which critics argue has long tainted democratic government in Britain. Ann Abraham, the ombudsman, has found No 10 guilty of unjustifiably keeping secret contacts between ministers and commercial companies who are seeking to influence them. Her ruling follows separate complaints from the Guardian and the Liberal Democrats. As a result of the verdict, Downing Street has been compelled to admit that a Labour donor met the prime minister at a sensitive time when he was seeking to win a lucrative contract from the government.

See Full [story](#)

For MP substitute Elected Member.

DCA: Model Action Plan

The Department of Constitutional Affairs published a model action plan for preparation for the implementation of the Freedom of Information Act (see it [here](#)) at the end of last year.

The Model Action Plan (the Plan) sets out five Strategic Objectives that public authorities should target to implement the Act. Each of the objectives is supported with a number of actions aimed at achieving the objectives. The Plan is not a detailed implementation plan as the Department of Constitutional Affairs recognises that each public authority is different. However, it will provide organisations with general guidance to assist them to pull together their own individual project plans for implementation.

FOI Speech

Speech by Lord Falconer on Freedom of Information. This is a transcript of a speech made by the Secretary of State for Constitutional Affairs on the importance of freedom of information at the St Brides Institute. Read the full speech [here](#)

Draft Fees Order

We know it's not yet sorted but here's the latest news [here](#) Bookmark it for the future.

More Public bodies brought in by order

[here](#)

DCA Road Map

A roadmap for full implementation of the Freedom of Information Act 2000 by public bodies in England and Wales has been released by the Department of Constitutional Affairs. It includes recommendations on how IT systems should be adapted, guidance on exemptions, networks for FOI practitioners, and a campaign to increase awareness of the issues: Click [here](#)

Environmental Information Regulations Consultation

The consultation on this is now closed. You can see a summary of 120 responses [here](#)

Local Government Association Press release and Publication

"Preparations are taking place across the country in readiness for this new legislation. Local Government is already much more open than many other sectors due to previous information legislation, and we must ensure that we continue to lead the way."

"The LGA has produced a guide – 'Delivering Freedom of Information: A practical guide to the Freedom of Information Act 2000' – to help authorities prepare for the training and awareness that is needed to meet the challenges and opportunities of the Act. Copies are priced at £10 for LGA members and £20 for non-members. Further information can be found on the LGA's [website](#) "

Guidance on the Public Interest test

A new document is on the ICO website outlines key elements of the public interest test
[Download PDF](#)

The Commissioner lists the following public interest factors that would encourage the disclosure of information:

- furthering the understanding of and participation in the public debate of issues of the day. This factor would come into play if disclosure would allow a more informed debate of issues under consideration by the Government or a local authority.
- promoting accountability and transparency by public authorities for decisions taken by them. By placing an obligation on authorities and officials to provide reasoned explanations for decisions made will improve the quality of decisions and administration

Lifecycle of FOI requests

Another new document is available on the [Information Commissioner's website](#)

"deliberately a technical, step by step explanation of the procedures which the Act requires public authorities to follow."

Exemptions Guidance Notes

FOI Awareness Guidance No. 1 is all about Section 40 and Personal Data. Click [here](#)

FOI Awareness Guidance No. 2 is about Section 41 Commercial Confidentiality. Click [here](#)

Corporate planning

Not one but two corporate plans from the ICO are now available on his website. Click [here](#)

Irish Information Commissioner : website update

There are some new documents on the Irish IC website: some recent cases of dispute where the IC has made a decision, some recent speeches and a high court judgement. Cases include disputed access to personal information access to tender information and an application for salaries of presenters at TV station RTE. <http://www.oic.gov.ie/new.htm>

The Irish Commissioner gave a speech recently about Journalists & FOI. See http://www.oic.gov.ie/25f6_3c2.htm

Freedom of Information In Scotland - FOI Survey

A research report on the preparedness of Scottish public authorities for the implementation of FOI has been published by the Scottish Information Commissioner on his website. Click [here](#) to read.

The study revealed that 84% of the public bodies surveyed are either 'fairly' or 'very' confident that they will have the systems and procedures in place to comply with the Freedom of Information (Scotland) Act, when it comes into force on 1st January 2005.

Kevin Dunion, Scottish Information Commissioner, said "With less than nine months to go, it is important to gauge whether Scottish public authorities are gearing up sufficiently for the new freedom of information laws. Our research reflects a positive response by Scottish authorities, and confirms other indications that, so far, we are on track to implement the new legislation on the timetable set down. However a significant effort in staff training and records management still has to be made to ensure that from 1 January 2005 all requests for information, whether from the public, media, or business, receive a quick and full response."

Scottish Civil servants' secrets set to be revealed

Read a feature from the [Sunday Herald](#)

Charging Fees Consultation

Although charging under freedom of information will be discretionary, regulations will set out the framework with which Scottish public authorities should comply when requesting fees for supplying information under the Act. The Scottish Executive is seeking comments on the draft fees regulations and on the associated guidance. See [story](#)

Useful site for Scottish Archives

<http://sca.archives.org.uk/>

Following a fully booked event in January, Act Now is repeating its Freedom of Information (Scotland) Act 2002 seminar in Glasgow on 25th May 2004. Full details at www.actnowtraining.co.uk

How long is a working day?

Clear Drafting is not always guaranteed in legislation relating to Information handling. Let's just examine the deadline set in the Freedom of Information Act for responding to requests for information.

Section 10 (1) says "...not later than the twentieth working day following the date of receipt". How long is a working day?

- A Day on which work is done (Web dictionary)
- The Working Day is the time the average wage worker must work in order to earn a living. "The Working Day" was the title of Chapter 10 of Marx's *Capital*.
- A day on which the banks in a currency's principal financial centre are open for business. (Global Forex Trading)
- A "working day" is a day of the week when a viable and guaranteed delivery can be made for the product or service concerned. (Online shop)
- From 6.00am until 2:00am the following day. The system is closed from 2:00am to 6.00am for maintenance purposes. (National Lottery)
- For full-time technical staff the working week is 37 hours giving a notional working day of 7 hours 24 minutes and a notional half day of 3 hours 42 minutes. For full-time secretarial staff the working week is 36.5 hours giving a notional working day of 7 hours 18 minutes and a notional half day of 3 hours and 39 minutes. (UK University)
- For apprentices and young people under the age of 18, the working day is 8 hours. For those over 18, the working day cannot exceed 10 hours. (Conseil Regional de Picardie)

With the drive for local government services to be online 24/7 how long is a working day? Answers please to info@actnow.org.uk. Experienced legal eagles of course will reach for the Interpretation Act 1978 (not on the web but probably in your Legal Library)

With over 17 years experience, Privacy Laws & Business is a leading provider of data protection compliance services. We can train your staff on data protection and FOI compliance through our regular workshops or via tailored in-house training programmes. And, as a leading authority on data protection auditing, Privacy Laws & Business offers workshops and in-house audits of company policies, procedures and staff awareness.

Our Annual International Data Protection conference in Cambridge (July 5th-7th, 2004), is the highlight of the privacy community's calendar, offering delegates the ideal opportunity to network with expert privacy practitioners, lawyers and national regulators.

In addition, we publish newsletters covering UK and International privacy compliance issues as well as a FREE e-news service. For more information about our products and services, visit our website at: www.privacylaws.com.

DATA PROTECTION

Life after Durant

Those who have attended our data protection course, will know that we believe that the case of *Durant v Financial Services Authority* (2003) EWCA Civ 1746 has turned the world of data protection upside down. No longer can we say that a data subject can get access to all information held about him/her. The case redefines "personal data" so that it has to fulfil three conditions - be focused on the individual, be biographical in a significant sense, affect the individual's privacy.

The ICO has produced a more detailed guidance note on *Durant* and its effect on personal data. Click [here](#). It gives examples of what it now believes to be personal data:

- salary information
- medical history
- financial information
- spending preferences

We believe that this guidance note expounds too narrow a definition of personal data. Whilst we believe *Durant* is correctly decided, the interpretation given by the ICO risks falling foul of the European Data Protection Directive. ICO's definition of personal data is now more akin to the definition of "sensitive personal data" under the Act. Surely this is not correct. In fact one solicitor's firm, specialists in data protection law, is advising the public sector to not give too much weight to *Durant* and stick to the European Directive definition. We don't know if this is correct but what we do know is that there is an Austrian case which has ruled that the Directive is directly applicable in national law and the DCA are taking advice on this whole issue. Watch this space!

MEPs threaten court action if commission does not withdraw passenger data.

Members of the European Parliament today threatened to seek a ruling by the European Court of Justice if the European Commission does not withdraw its decision that protection for air passenger data transferred to the US is adequate. MEPs adopted by 229 votes to 202 with 19 abstentions a report by Dutch Liberal MEP Johanna Boogerd-Quaak (D66). Welcoming the result of the vote, Mrs Boogerd-Quaak said:

"MEPs today spoke up loud and clear in defence of the civil liberties of European citizens. By a clear majority, in the face of intense lobbying, Parliament has said to the Commission "Go back to the drawing board, this agreement is not good enough".

We are not satisfied with the privacy safeguards secured by the Commission, and we now expect them to withdraw their decision and come back with better safeguards. If they do not, Parliament has indicated that we are willing to go to the European Court of Justice. I believe we have a good case, given the opposition of European Data Protection Commissioners to these transfers of data."

"We are not opposed to an agreement, and we understand and share the imperative to fight terrorism. We simply do not accept that we have to ride roughshod over our civil liberties to tackle terrorism effectively. A key safeguard would be to limit the transfers to only 19 data fields, rather than the current 34, and the data should not be stored for such a long period of time. We should only send the data we think is appropriate, filtering out sensitive information, rather than giving the US complete access to all data."

"Next week, the Civil Liberties Committee will vote on the agreement between the Commission and the United States. If the Commission does not withdraw its adequacy finding, I expect the same majority that we secured today to vote against the agreement next week."

Following next week's vote in the Civil Liberties Committee, the full Parliament will vote on the EU-US 'light agreement' at its plenary session in the week of 19 April

This story first appeared on April 1 on the bulletin boards. Hardened (and sceptical) information professionals questioned the name Johanna Boogerd-Quaak sensing an april fool but with the miracle of google it was quickly proved that she does actually exist and probably attends dinner parties and speaks 15 languages. Read her [biog](#) and Read the article at <http://eld.euoparl.eu.int>

Bichard Enquiry

The [Bichard inquiry](#) has now finished hearing evidence. Sir Michael Bichard has promised his report will be published in May. He has also pledged to reconvened to see how his recommendations are being implemented. Lots of interesting issues have come out of the evidence and no doubt there will be some changes to the DPA recommended as well as more clearer guidance on when data about suspected paedophiles can be shared.

One of the most excruciating parts was reading about the Humberside Police Data Protection Officer being grilled by the inquisitors. Can you imagine you being hauled up in front of a Government Inquiry? How much do you earn? Is it enough?

Read the final press release [here](#)

Durant killed the video star (by an Act Now Staff Writer)

The Durant v FSA case in the court of Appeal dramatically changed the way that personal data is interpreted. In a nutshell it has to be biographical, focussed on an individual and infringing their privacy. Like many others we have many cctv cameras in operation in our city. How many of these are now covered?

The answer is quite simple. Virtually none. To be considered personal data the video of an individual has to clearly identify them; long shots of city streets with bustling pedestrians are clearly not in this category. It also has to impact on the privacy of that individual and merely walking up and down a street doesn't usually have that effect. To identify an individual and record something significant the system has to zoom in and follow that person for some time. Most small shops or static cameras don't have this capability. DP does not apply.

You can further justify this by ensuring that appropriate signs are in place so that members of the public know they are in a surveilled area. This in itself modifies their behaviour and lowers their expectation of privacy. You do have appropriate signs in your city centres don't you?

Worse still videotapes are of varying quality. Some systems are so old that you have to question if they are fulfilling any real purpose whatsoever. The images are so bad, so monochromatic that it is impossible to identity anyone from the images. A camera without film would be better; an empty box with black and yellow sellotape on might have the same deterrent effect and be much cheaper.

But what if our cctv operator in our plush council control room is suddenly called by the police liaison officer who says a crime is underway and they need video of a certain street? Doesn't DP come in here? Think hard for a moment. Is it directed surveillance? Do your appropriate signs cover this? Should the Police supply a RIPA authorisation to the CTV control room? Where's the DP issue here?

The other area where Durant has an effect is on relevant filing systems. If Richard Thomas made a request for access to a video tape of himself walking through Wilmslow would the operator have a tape labelled Richard Thomas or would he have to ruffle through boxes of tapes that might have the Commissioner on and view each one? Where's the structured filing system? Where's the sophisticated search mechanism?

CCTV isn't covered at a low level by DP legislation. The only time it might be covered is if you are zooming in on an individual and recording significant images about the person's behaviour and that's covered by RIPA. CCTV - DP? No connection.

See the commissioner's view [here](#)

How's IRT/IRS progressing in the UK

RSE Consulting have produced a document that looks at most of the Trailblazers and gives an update on their work. Good for any information professional needing to have a national picture. Click [here](#) (click cancel if prompted for a password)

CHILDREN BILL and IRT/IRS

Now the draft bill is published there are comments about its content.

<http://www.dfes.gov.uk/everychildmatters/pdfs/75E80A00final.pdf>

Section 128 to 143 are most relevant.

<http://www.publications.parliament.uk/pa/ld200304/ldbills/035/2004035.htm>

Section 8 refers to information sharing but makes it clearer but it still bones waiting for flesh.

<http://society.guardian.co.uk/children/story/0,1074,1161338,00.html>

Ministers start telling us what the Government's view is. There's plenty of work in this yet.

<http://www.communitycare.co.uk/AccessSite/articles/article.asp?liarticleid=44031&liSectionID=3&liParentID=2>

Read an interview by Margaret Hodge, Minister in charge.

NATIONAL AND REGIONAL GROUPS

REGIONAL GROUPS

Over the years many networking groups have grown up. Some now have significant memberships. All of them offer support to people working in the sector. Click to find contact names of regional organisers.

[East Midlands](#)

[East of England](#)

[London](#)

[North East](#)

[Northern Ireland](#)

[North West](#)

[Scotland](#)

[South East](#)

[South West](#)

[Wales](#)

[West Midlands](#)

[Yorkshire and the Humber](#)

Forthcoming regional meetings

The AGM of the **West Midlands** Local Authorities Data Protection Forum is taking place on 16 July 2004 at Himley Hall, Dudley. It's a full day event with lunch and has the following speakers. FOI (someone from the ICO) - Not a typical FOI presentation but something more meaty, NAIM - Alan Stead gives a presentation on the new organisation, Durant Case - Presentation from Louise Townsend of Masons, Public Records Office (National Archives) - Speech on Records Mgt, A Speaker from the Information Rights Division Department for Constitutional Affairs (unconfirmed). Email Paul.Couldrey@dudley.nhs.uk for more info

Midland Public Authorities Data Protection Group will meet at 10:30 on 22nd April in Derby Town Hall where speakers will include I-file and hopefully a speaker from ICO on FOI. Contact alan.stead@nottinghamcity.gov.uk

Nottinghamshire group have a county meeting at 10:30 on 26th April in Ashfield and a special meeting for chief Executives and lead politicians at Kelham on 28th April at which Paul Boyle from DCA will speak on FOIA. Contact alan.stead@nottinghamcity.gov.uk

Scottish Information Network are meeting on 6th May at Stirling Castle. Agenda includes Scottish Executive on data/information sharing, Central Scotland Police on Section 29 notices, Robert Turnbull ICO on DP/FOI and information sharing, Cather Schlater (OSIC) on FOI exemptions enforcement and FOI/DP interface. Contact Allan Graham grahama@stirling.gov.uk

In **Yorkshire** the City of Wakefield MDC has organised a free seminar for local authorities throughout the Yorkshire & Humber region. The seminar will take place on Friday 16th April 2004 at the National Coal Mining Museum, Wakefield. A strong-line up of speakers has been arranged for the day, including Phil Boyd, Assistant Information Commissioner, Maurice Frankel, Director of the Campaign for Freedom of Information, Jon Hoare, Policy Advisor, Department for Constitutional Affairs, Stuart Abraham of the National Archives, Ibrahim Hasan of Act Now Training and Mike Ward of BT Open Access. Each local authority in the Yorkshire & Humber region has received a written invitation to send three delegates to the seminar and there may be places available for outside the region. Contact Jill Farrington on 01924 305016 for more info.

NATIONAL ORGANISATIONS

NADPO

For ten years there was the National Association of Data Protection Officers. Last year in July it embarked on an Agenda for Change. AGMs and EGMs have happened and are planned but the most significant change recently has been the website which is now much better looking. Charges for membership and currently concentrates mostly on Data Protection matters. Click for their [Website](#)

Another National Organisation is planned. This is NAIM - the National Association for Information Management. Broader than NADPO it seeks to cover the whole Information Management spectrum. They recently produced a statement which sets out their aims.

National Association for Information Management

Information is the lifeblood of the organisation of the future. NAIM will be a portal to enable sharing of information, dissemination of best practice and links to topical sites. NAIM will not only be reflective of needs of today but is made up of forward thinking individuals that will endeavour to foresee issues/projects/legislation and training that will impact on how we work and produce best practice guidance for all to adopt.

The inaugural AGM will be held in autumn 2004. Until the AGM the organisation is under the direction of 8 founder members under a temporary chair.

NAIM is an organisation with professional staff offering services to its members, its affiliates, the media and the general public whilst liaising at the highest level over information management issues. NAIM will work closely with the National Regulator and Government offices to ensure that regulations and legislation is appropriate and reflects best practice in this sector proactively bridging the gap by providing a voice for all Information Practitioners.

NAIM will promote good information handling in the Public, Commercial and Voluntary sectors, assisting in compliance with information related legislation. We will offer significant benefits to members in the area of training, recruitment, guidance and documentation on information issues by affiliating organisations and companies into the NAIM arena.

NAIM will be a portal that all information practitioners will find invaluable providing guidance on the following topics (this list is not exhaustive and will evolve to meet society needs):

- Data Protection
- Freedom of Information
- Records Management
- RIPA
- Caldicott
- Information Governance Toolkit
- Information Sharing
- Training
- IRT
- Privacy

NAIM will also have a bulletin board for members to air their comments.

NAIM will take issues to the highest authority to lobby for change to legislation. This issue has become more prominent with the interests of all those implementing Customer Relationship Management (CRM) systems wishing (but unable) to use Council Tax. We will actively seek views from all members on issues they wish to be heard at National level whilst

at the same time being able to provide a voice and push for change.

NAIM will initially be a free organisation and they only have a holding page where their website will appear ([website](#)) You can email them to be placed on a list which will alert you when they launch.

INTERESTING SNIPPETS

Big Brother Strikes again.

How your mobile phone may provide information overload. An amusing story from the Guardian online. [story](#)

Processing overseas can damage your personal data

[The BBC reports on the problems of outsourcing your call centre to India](#)

Disturbing case from the USA about selling of personal data leading to murder

It was reported on March 10th that Helen Remsburg, whose daughter Amy Boyer was shot to death by a former high school classmate, had settled her suit against Docusearch, Inc. Amy was shot by Liam Youens, who chronicled his obsession with Amy and his plot to kill her on a Web site and had paid Docusearch roughly \$150 to get her Social Security number and other personal information, including her work address. Remsburg sued the Ashburn, Virginia company in U.S. District Court four years ago, though Docusearch claimed none of the information it had provided was private.

Remsburg had alleged that Docusearch invaded her daughter's privacy and violated other laws when it provided information to Youens. The Remsburgs said they decided to settle for \$85,000 out of frustration with the court system. Full [story](#)

Where there's a will there's a web

If you would like to read Shakespeare's will, you can now do so online. The document is among more than 1 million wills, spanning five centuries, which Britain's National Archives has posted on the Internet for public access. One hundred of the wills, dated from 1384 to 1858, have been collated in a special section dedicated to their famous authors, including Jane Austen, Captain James Cook and Napoleon Bonaparte. Shakespeare's will is free to download and the others cost \$6.40 each. The wills may be found [here](#)

Reconciling Security and Liberty in an Open Society

A discussion paper that's worth a look. Foreword by David Blunkett, Click [here](#)

Yorkshire & Humber DP Forum

If you are working in Data Protection in the public sector this site will interest you. There is a free bulletin board and documents to download. The group has a working party on FOI issues. Over 80 members and quarterly meetings in the region. You can also take advantage of free/discounted courses. Click on <http://groups.msn.com/YorkshiretheHumberDPForum>

Training in Information Management issues

Act Now offers a programme of high quality but low cost Training courses at city centre venues throughout the UK or can come to you and deliver training in-house. We can train 50

people at your premises for the price of 2 delegates at an expensive London course. Obtain best value for your organisation. Our speakers work in the public sector and bring up to date expertise to the training courses. Contact Act Now for details.

	<p>Act Now is a trading name of Act Now Training Ltd Selbourne House, 26 Selbourne Avenue, Dewsbury, West Yorkshire, WF12 9PA Fax 01924-520242, Email info@actnowtraining.co.uk</p>
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