



Welcome to the 27th issue of our quarterly Newsletter.

Next issue October 2007

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Autumn 2007 Program

Act Now has just launched its Autumn 2007 program. Most of our usual favourites have been revised to take account of changes in legislation, latest cases and government/ICO guidance. We also have three new courses, CCTV and the Law with Tim Turner, Train the Trainer with Paul Simpkins and Multi Agency Information Sharing with Ibrahim

Don't forget that all our courses are available to be delivered at your premises and tailored to your needs. Please see our website for further details or click on this link to download the full Autumn 2007 flyer. <http://www.actnow.org.uk/Aut07/FULL.pdf>

Changes to our Autumn programme

Handling Requests for Personal Data. There's been a change of date for this course. The date of 27th November has been brought forward to 26th September. This is your chance to learn about the process of subject access under DP and also FOI. There are many cases where 3rd party personal data has been requested under FOI. This workshop looks at this issue.

The new course on CCTV has also proved very popular and we will be adding another date in the north. Watch our website front page and this will be announced shortly or email info@actnow.org.uk to register your interest.

In House Training

If you want us to deliver training at your site please contact us. Both Directors regularly do in house work and we have a number of associates who can also deliver in house training on many subjects. At your site you control the numbers of delegates and can deliver training at £20 or £30 per delegate. You also provide the venue at little or no cost to your organisation and your staff don't incur travelling expenses. Obtain best value - bring the trainer to you! In the last three months we have done in house training for Rochdale Council, Manchester City Council, Healthcare Commission, BSKyB, Invest Northern Ireland, Vale Royal Council, Stockton on Tees, Dumfries & Galloway Council, Suffolk Coastal and many more

Legal Advice, Training, Podcasts and Consultancy

For Consultancy, Audit & Training see Paul's website <http://www.paulsimpkins.com>

For Legal Advice, Podcasts & Training see Ibrahim's website <http://www.informationlaw.org.uk>

Thank you for your continuing support

Paul & Ibrahim

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FREEDOM OF INFORMATION

1. Latest ICO and Tribunal Decisions

The Freedom of Information Act 2000 continues to have a big impact on all aspects of the public sector. Lots of interesting appeal decisions have come out in the last few months, from both the Information Commissioner's Office and also the Information Tribunal. These have dealt with difficult issues such as :

- Empty properties
- Job evaluation criteria
- A council's vehicle towing policy
- A hospital's audit report
- When information is held on behalf of a public authority
- The link between the Enterprise Act and FOI
- The disclosure of surveillance information
- The retirement packages of senior officers

If you would like a full explanation of all these decisions then download the FOI podcast from Ibrahim Hasan. This is the first service of its kind in the UK and it's completely free. It's even been mentioned in the Times. Every month Ibrahim discusses the latest legal cases and gives his personal views as to how they affect FOI practice. There are also interviews with experts and FOI stakeholders. The first seven episodes are now on Ibrahim's personal website. You can also read the full transcripts. See <http://www.informationlaw.org.uk>

Read Ibrahim Hasan's recent article in the Law Society Gazette

<http://www.informationlaw.org.uk/USERIMAGES/lsgfoiarticlejuly.pdf>

Act Now Training is also running a workshop series where these decisions will be discussed in detail. Full details at <http://www.actnow.org.uk/aut07.htm>

2. FOI & Early Retirement and Departures of Senior Officers

The Information Commissioner recently upheld the decisions by two local authorities to withhold information about the retirement packages of senior officers.

Calderdale Council <http://digbig.com/4teqh> and City of York Council <http://digbig.com/4teqj>

both received separate requests under the Act for details relating to the retirement packages of former directors. Both councils refused to disclose the information, stating that the information constituted personal data so was exempt under section 40. The Information Commissioner agreed that the disclosure of personal data would, in both cases, be unfair.

In both cases the Commissioner took account of the seniority of the persons involved but ruled that they still had a right to privacy. To me this does not sit squarely with other decisions including one involving Corby Council where the Commissioner ruled that the salary details of a former temporary finance officer should be disclosed. He gave weight to the seniority of the individual together with the fact that he was in charge of spending public money. One has to ask what is the difference between disclosure of salaries of senior officers and their retirement packages? Both are essentially to do with remuneration and the spending of public money.

Surely in both of the recent cases the former directors were sufficiently senior and also made decisions involving the spending of public resources. The public have a right to know not just what they are paid during employment but also upon retirement.

Although the York case did involve the presence of a compromise agreement with a confidentiality clause (often relied upon by ICO as evidence of an expectation of confidence), no such agreement was present in the Calderdale case.

If you are interested in access to personal data under FOI, please see Ibrahim Hasan's article in the March issue of World Data Protection Report <http://digbig.com/4teqk>

3. Vexatious or Repeated Requests

Decisions on Vexatious and Repeated requests continue to keep the Commissioner busy.

Brockhampton Group Parish Council - Case Ref: FS50135471

Cabinet Office - Case Ref: FS50134560

Bretforton Parish Council - Case Ref: FS50109184

DWP - Case Ref: FS50125496

The Commissioner seems to be interpreting the provisions of section 14 quite widely to deal with nuisance requests.

Case Ref: FS50086298 Date: 19/03/2007 The BBC

http://www.ico.gov.uk/upload/documents/decisionnotices/2007/fs_50086298.pdf

The BBC received around ninety requests relating to the authority's hospitality expenditure and employee expenses claims during a short period of time. The Information Commissioner agreed that the requests were vexatious for a number of reasons: the volume of requests had the effect of harassing the public authority and some members of staff with whom the complainant had corresponded. In addition the Commissioner ruled that the requests could be characterised as obsessive.

Graham Smith, Deputy Commissioner said: "While giving full support to individuals seeking to exercise the right to know responsibly, the ICO is sympathetic towards public authorities receiving specific requests which impose a heavy burden on their resources, particularly where the public interest in the disclosure of the information is limited. The Freedom of Information Act recognises that there are limits to compliance beyond which public authorities are not obliged to go and we encourage the appropriate use of these provisions by public authorities."

4. Trading Standards and Enterprise Act 2002

Previously we discussed an ICO decision involving East Sussex Council that confirmed what many Trading Standards professionals have often claimed i.e. that Part 9 of the Enterprise Act 2002 provides a legal prohibition on disclosure of certain information they come across as part of their regulatory functions (Section 44 FOI).

Further confirmation of this interpretation has now been provided by the Information Tribunal in a recent decision involving the Office of Fair Trading (OFT). *Mr M J Dey v Information Commissioner* (16 April 2007)

The complainant requested information concerning complaints made about a specific company. The OFT invoked section 44 (statutory prohibitions) as the information was provided under the

Enterprise Act 2002. The Information Tribunal agreed with the Commissioner that Part 9 and in particular section 237 was a bar to disclosure. FOI made it exempt under section 44.

Interestingly the Tribunal considered and disagreed with the Scottish Information Commissioner's decision involving Dumfries and Galloway Council, where he took the opposite view.

The Tribunal's decision will provide some comfort to trading standards and other local authority regulatory departments who often receive FOI requests. Care must however be taken to ensure that the information has been gathered pursuant to the specified functions set out in the Enterprise Act. It is also important to note that, if the request is for environmental information, EIR does not provide the same exemption.

5. New Civil Procedure Rules

Whilst a lot of court documents will be covered by the absolute class based exemption under section 32, colleagues are invited to consider the new Civil Procedure Rules which allow access by non parties to certain documents. See <http://digbig.com/4teqm>

6. First Tribunal decision to go to the High Court?

The Government has lost its case re ID Card gateway reviews being made public. This is the case where the Government employed QCs to fight its corner - <http://digbig.com/4teqn>

The Office of Government Commerce, it now transpires, is to appeal to the High Court over the Information Tribunal's ruling that so-called "gateway reviews" of big government information technology and other projects should, in some cases at least, be disclosed.

The reviews are undertaken at key moments in the life of such projects from their conception onwards. Traffic light scores are awarded, red indicating that immediate action is needed over serious and possibly fatal problems.

Hundreds of these have now been conducted. But the OGC has consistently refused to disclose them. To do so would fundamentally undermine the process, it argues, preventing frank discussion, discouraging those with problems from owning up to them, and discouraging commercial organisations from taking part. Faced with a request to disclose the early reviews of the identity cards project, civil servants refused the request. First the Information Commissioner and then the Information Tribunal proceeded to rule against them.

Undaunted, the OGC is appealing further. The tribunal's findings, however, show the shaky ground it is on. It found the "grave consequences" that the OGC claims would follow from disclosure to be "overstated". It established from witnesses that these days the reports are written on the basis that they may be disclosed - and thus are drafted in ways to ensure there will be "no unnecessary political embarrassment" or other damage from disclosure.

And the tribunal found that while a "safe space" may be needed for a time to conduct such reviews, the passage of time leads to the public interest in disclosure outweighing that. On a project as critical and controversial as ID cards, that is clearly the case. It is to be hoped that the High Court, too, sees it. Details at <http://digbig.com/4teqp>

7. Prime Minister to act on FOI modifications

We thought you would like to know that there have been strong indications that Gordon Brown has decided to kill off the proposed fees regulations on which the Department for Constitutional Affairs (now the Ministry of Justice) was consulting. This is referred to in an article "Chancellor to block moves to water down FOI" in The Daily Telegraph on 23 May, which stated:

The Chancellor is ready to block plans drawn up by Lord Falconer which critics claim are designed to make it more difficult for people to obtain information from Whitehall. The Lord Chancellor's proposals would mean the cost of inquiries included the time that officials took to decide whether to accede to a request, not just the time it took to track down the information. Sources said last night that Mr Brown felt Lord Falconer's plans were unsustainable.

However, while the Chancellor is prepared to block them when he moves into No 10, he believes that Richard Thomas, the Information Commissioner, needs to beef up his response to genuinely vexatious inquiries. Officials believe that Mr Thomas can do more to deal with the relatively small number of people who submit repeated requests on the same issue, tying up officials' time in an endless paper chase."

Full article - <http://digbig.com/4teqq>

8. Which part of the BBC are you asking for information?

Under Schedule 1, Part VI of FOIA, the BBC is subject to the Act "in respect of information held for purposes other than those of journalism, art or literature".

It has used this exclusion to refuse disclosure of a report that they commissioned into allegations of bias in its reporting of Middle East issues. The ICO upheld this exclusion, the Information Tribunal overturned it.

However, the High Court have indicated that they will issue a ruling that, because the ICO had agreed that this report was excluded from the Act, the Tribunal did not have jurisdiction to hear an appeal.

"A BBC spokesperson said: "This clarifies that, in cases where the information commissioner agrees with a public service broadcaster that the information sought is outside the scope of the Freedom of Information Act, there is no appeal to the information tribunal.""

Aside from broadcasters, there are a number of other organisations who have areas of exclusion from FOIA. I believe that this will set a precedent for them too.

In effect then - if the ICO agrees with a public body that information is outside of the scope of the Act, the applicant will have no right of appeal. However, if the ICO disagrees with the public body and rules that the info is within the scope of the Act, then that public body will still be able to go to the Tribunal. See more at <http://politics.guardian.co.uk/foi/story/0,,2045920,00.html>

DATA PROTECTION

9. New laws to allow access to information about paedophiles

<http://news.bbc.co.uk/1/hi/england/somerset/6538371.stm>

Parents are to be given the right to know if paedophiles are living near their homes as part of a pilot project. The move follows years of campaigning by parents for Megan's Law - named after a similar rule which was introduced in the US. North East Somerset will be the first area to test the scheme after the idea was championed by local MP Dan Norris. Two other tests will follow after it is introduced to Mr Norris's constituency in Wansdyke.

10. NHS National IT Programme

A software upgrade under the NHS's National Programme for IT (NPfIT) has led to hundreds of incorrect duplicate patient records being created every day at NHS sites in Greater Manchester. A team has been formed to prevent patient data being lost. The emergency action raises questions about how NPfIT systems are being tested before going live. <http://digbig.com/4teqr>

11. Information Sharing – Latest News

Information sharing certainly seems to be developing. Lots of interesting links

<http://www.trackoff.org/pdf/March2006.pdf>

<http://www.peterborough.gov.uk/page-9191>

Lots of new guidance has been published by the Information Commissioner:

On PVP markers: <http://digbig.com/4teqs>

On sharing of emergency planning information:

<http://www.ukresilience.info/publications/dataprotection.pdf>

See also the link to DWF policy on providing information to the police (and others)-

http://www.rightsnet.org.uk/pdfs/DWP_Pers_Info_Policy_03.pdf

The government's initiative, previously know as the Children's Index, now called Contact Point has now been launched:

<http://www.everychildmatters.gov.uk/deliveringervices/contactpoint/>

The guidance for this emphasises training. There is widespread ignorance of the extent to which these information sharing can be carried out lawfully by public sector organisations and other agencies.

We are running a new course, entitled "Multi Agency Information Sharing", which will guide you through the maze of legislation in this area. We will examine the Data Protection Act, the Human Rights Act and the latest cases and guidance in this area. With the introduction of

Entitlement/Identity Cards, One Stop Shops, the Contact Point, Biometric Passports etc. information sharing will be even more of a hot topic. See <http://www.actnow.org.uk> for details

12. Audit Commission loses data twice

There's been a fuss regarding the loss of data about 6,500 employees when a council in the south west sent it by CD to the Audit Commission.

See <http://news.bbc.co.uk/1/hi/england/devon/6479617.stm> and <http://digbig.com/4teqt>

ironically it was being sent to the Audit Commission's National Fraud Initiative.

13. GM subsidiary paid conman for "blagged" private data, court told

A PI was convicted of 44 offences of stealing and selling private data in a prosecution brought by Richard Thomas, the information commissioner, and fined £3,200 plus £5,000 costs

<http://www.guardian.co.uk/crime/article/0,,2064180,00.html>

14. Employee's privacy breached by employer's monitoring

The collection and storage of information by an employer of an employee's telephone, e-mail and internet usage at the place of work was, in the absence of any legal provisions, unjustified. (Copland v United Kingdom (Application No 62617/00) in the European Court of Human Rights)

<http://business.timesonline.co.uk/tol/business/law/reports/article1695516.ece>

15. Junior doctors' sensitive data published on website

<http://society.guardian.co.uk/health/story/0,,2065734,00.html>

16. Information Commissioner audits HBOS

The Information Commissioner's Office (ICO) is conducting an audit of Halifax Bank of Scotland (HBOS)'s data security procedures after it was revealed that the bank was putting customers' financial documents in ordinary bins.

http://www.ico.gov.uk/upload/documents/library/data_protection/notices/scan_hbos.pdf

17. Guidance from Local Services Inspectorate Forum.

This document may be of some interest - particularly the approach to partnership working. It is a "... general framework to promote consistency of approach to information management by those inspectorates who need to share information about Freedom of Information (FOI) requests for the effective operation of their functions."

http://www.communities.gov.uk/embedded_object.asp?id=1511151

18. Leeds crown Court jails DP Scammers

More bogus agencies get their come-uppance

<http://complianceandprivacy.com/News-UKIC-gets-fraudsters-jailed.html> has the full story

19. Who's your Caldicott Guardian?

This is a link to The Caldicott Guardian Manual issued in 2006, it states who the Caldicott Guardian should be in each organisation. <http://digbig.com/4teqw>

20. Orange & Littlewoods in breach of Act.

<http://digbig.com/4teqx>

21. Think you're good at DP?

<http://digbig.com/4teqy>

22. ICO crackdown on recruitment

<http://digbig.com/4tera>

23. Not Identity fraud but payslip fraud.

Can't get a mortgage because you don't earn enough? Why not make a few payslips that prove that you do? <http://wageslips4u.co.uk/> is the site for you. While they stress that they are not in the business of fraud it's clear what they offer is open to abuse.

SURVEILLANCE LAW

24. Surveillance of Employees – Latest Cases

Colleagues who advise on RIPA and employee surveillance will be interested in two recent decisions.

In *C v The Police* – 14th November 2006, the Investigatory Powers Tribunal held that covert surveillance of employees suspected of non criminal activities did not fall into the definition of directed surveillance because it was not for a “specific investigation or operation.” The tribunal interpreted the latter words as requiring an investigation to be carried out for the specific regulatory functions of a public authority not the general functions such as staffing.

Of course such surveillance will still be caught by part 3 of the DP Employment Code: Surveillance of Staff and so employers will still need to do an Impact Assessment.

A case before the European Court of Human Rights has ruled that the collection and storage of information by an employer of an employee's telephone, e-mail and internet usage at the place of work was, in the absence of any legal provisions, unjustified.

Copland v United Kingdom (Application No 62617/00) states that article 8 of the European Convention on Human Rights, protecting the right to respect for private life and correspondence, had been breached.

<http://business.timesonline.co.uk/tol/business/law/reports/article1695516.ece>

Click here <http://www.informationlaw.org.uk/USERIMAGES/cvpoliceripa.pdf> to read Ibrahim Hasan's article on employee monitoring first published in Solicitors Journal. We are running a course on e mail and internet surveillance. See our website for details.

24b Surveillance Commissioner Inspections

The Office of the Surveillance Commissioners (OSC) have now started doing much more rigorous inspections. Some councils have been inspected twice in one year. The key to a successful inspection is preparation. We have prepared a list of common OSC criticisms of local authorities to help you prepare-

<http://www.informationlaw.org.uk/USERIMAGES/osccriticisms.pdf>

Are all your officers and managers up-to-date with the latest developments on Directed Surveillance and use of a CHIS? Act Now has won a tender to do surveillance law training for the Health care Commission.

If you would like refresher training in this area please contact us at info@actnow.org.uk Tel: 01924 451054

25. Accessing Communications Data – Latest News

The RIPA Communications Data Code of Practice (final version) is shortly to be laid before Parliament. See <http://www.informationlaw.org.uk/USERIMAGES/commsfinalcode.pdf> to read the final version.

Many authorities have now started to be inspected by the Interception of Communications Commissioners (ICC). These have a similar role to the OSC in reviewing and scrutinizing the way public authorities access communications data from communications service providers under RIPA. Common criticisms include:

- Using old forms
- Not considering necessity and proportionality properly
- Using cut and paste techniques
- Lack of training

We have two courses in this area:

1. One Day Designated Person/ Investigator Workshop York – 6th November 2007

This is a practical workshop on how to access communications data under the Regulation of Investigatory Powers Act 2000 (RIPA). It is essential that those who are seeking to use these powers as well as those who are authorizing their use (Designated Persons), have a good understanding of the law and practice in this area. This workshop will examine the latest Code of Practice and Home Office forms/guidance in this complex area and help your organisation prepare for inspections by the Interception of Communications Commissioners. This is an interactive course with plenty of opportunity for questions, discussion and for working through case studies and exercises.

2. Two Day Home Office SPoC Accreditation Course Manchester - 10th & 11th December

All organisations using RIPA powers to access communications data must have a named Single Point of Contact (SPoC) who should have attended a Home Office approved training course by 31st March 2005. Many have still not done this. This is one of the few courses still running. It is suitable for Scottish delegates too as the law is the same.

At the end of the two days delegates will sit a one hour multiple choice exam. So far we have trained almost 200 delegates. All have passed the exam with flying colours (Note: This course carries 8 CPD Hours.)

26. Email and Internet Monitoring Workshop

Monitoring and recording of employees' e mail, internet and telephone usage, whether with or without consent, is a legal minefield. This is a thorough examination of the law and practice in this area. We will look at Part 1 of the Regulation of Investigatory Powers Act 2000 (RIPA) as well as the Lawful Business Practice Regulations, the Human Rights Act and the Data Protection Act and related codes.

This is an interactive workshop full of exercises and case studies. As well as the latest caselaw we will discuss the possibility of using written policies and procedures to guard against the legal problems. This course is a must for all employment lawyers and personnel advisers, whether in the public or the private sector, who are often called upon to advise on these issues.

27. Camera Watch

CameraWatch is an independent, not-for-profit, self-funding advisory body* that will support organisations impacted by CCTV and their understanding and compliance with current policy and legislation: <http://www.camerawatch.org.uk/index.html>

And the commissioners view

http://www.ico.gov.uk/upload/documents/pressreleases/2007/statement_camerawatch_1.pdf

28. RIPA Review

For those of you who have to manage RIPA there have been important developments in the last few months. Read our summary in this document. <http://www.actnow.org.uk/RIPAreview.pdf>

SCHOOLS SECTION

29. Things to think about before putting pupil info on the web? (from a bulletin board)

A school decided to put information concerning all its pupils on the school website, accessible by a simple password announced to all staff during a staff meeting. The purpose is to allow staff to contact pupils' parents when off-site. The information available includes pupil name, address, phone number, DOB, Exam results, Aptitude test results. The question was asked on the board – what are the data protection issues? Some of the responses are summarised below.

a) The question with this from a DP point of view is almost completely a security one. Is it appropriate for information of this sort to be placed on the internet, hidden behind just a password and is it appropriate that all the teachers have access to the records of all pupils.

Is the information sensitive? I would say not on the whole although it is possible that the results of the aptitude tests may be. These may be children but that doesn't make the info more sensitive from a DP point of view.

Given the above, we all know that principle 7 talks about appropriate technology being used to protect the information. I would suggest that a single password is not appropriate even for non-sensitive info although it is not really a breach of DP until someone accesses it inappropriately.

You should be looking at 2 or 3 factor authentication. Also is it appropriate that this info is published via the web?

When thinking about the teachers, is it appropriate that they should all have access? From an administration point of view I suspect it is much easier to set the system up with all the teachers given access rather than complicate the issue by giving each teacher a subset of the pupil record. All the teachers may at sometime come in to contact with all of the pupils and all teachers have had CRB checks, to restrict their access may cause other complications, sometimes you need to be pragmatic.

This is only a look from a DP point of view, there may be other pieces of legislation related to children that are breached which bring in principle 1 on fairness and lawfulness.

b) My immediate reaction is that they should at least have a different password for each member of staff, so they can audit usage, and withdraw access when a teacher moves to a different school.

c) Meanwhile, what if there were any children of a teacher at the school, it would be possible for them to see their own child's records in a way that normal parents can't. Is there any "other" rule being broken there?

d) The BECTA learning platform proposes that more than just school staff have access to such data. Parents, Governors may all have 24/7 access.

e) a company in the sex sector that offered free samples to potential customers held the data about those customers on their website but a google robot found it and listed it. Can the school guarantee it won't fall into the same trap?

f) Is the data about pupils read only or can anyone change it?

g) Could a pupil access this system? Change records in the system? There have been films about this for over 20 years...

Any school thinking about placing pupil data on the web should think long and hard about security and privacy.

30. Honesty is not always the best policy

A school has apologised for producing a confidential report which called one pupil a "wally", another a "dingbat" and described one child's mother as "quite rough".

See <http://news.sky.com/skynews/article/0,,30100-1266732,00.html> for the story

OTHER ITEMS

31. Guidance on PECR 2003

<http://digbig.com/4terb>

32. DEFRA website for EIR guidance.

<http://www.defra.gov.uk/corporate/opengov/eir/index.htm>

www.actnow.org.uk

Training for the information society

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