

Welcome to the October 2003 issue of the Act Now Newsletter on Data Protection, Freedom of Information, privacy and information management issues in the Public Sector. Now over 1,320 subscribers. Please read the disclaimer and other important information at the foot of the newsletter.

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Act Now autumn programme offers training courses in Manchester, York, Belfast and London on Data Protection, Freedom of Information, Surveillance law, Regulation of Investigatory Powers and Records Management. Full details on [www.actnowtraining.co.uk](http://www.actnowtraining.co.uk)  
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In this issue

#### 1. NEW ACT NOW CONSULTANT

#### FREEDOM OF INFORMATION

2. ARE YOU READY FOR 2005?
3. SCHOOLS PUBLICATION SCHEMES
4. THE LAND REGISTRATION ACT 2002 CONFIDENTIALITY ISSUES
5. FOI IN CONFLICT WITH OLDER ACT?
6. MORE PUBLIC BODIES BROUGHT INTO FOI, SOME TAKEN OUT
7. TRANSPARENCY AND FOI

#### DATA PROTECTION

8. NEW HSE ACCIDENT BOOK
9. INFORMATION COMMISSIONER'S ANNUAL REPORT
10. THE EUROPEAN VIEW
11. PROMOTING SUBJECT ACCESS
12. HUTTON ENQUIRY WEBSITE & WORD DOCUMENTS
13. RESPONSE TO SUBJECT ACCESS CONSULTATION
14. ONE CLICK TO ALL PREFERENCE SERVICES
15. USING THE ELECTORAL REGISTER FOR MAILSHOTS

#### DATA SHARING

16. DATA SHARING (1)
17. DATA SHARING AND IRT
18. DATA SHARING IN GENERAL
19. IDENTITY THEFT

#### RECORDS MANAGEMENT

20. FOI – THE RECORDS MANAGEMENT VIEW
21. LOCAL AUTHORITY RECORDS MANAGEMENT
22. CONSULTATION FROM NATIONAL ARCHIVES

#### HUMAN RIGHTS

- 23. HAMPSHIRE COUNTY COUNCIL v GRAHAM BEER (2003)
- 24. PRIVACY LINK (THE GUARDIAN)
- 25. GOVERNMENT PLANS TO UPDATE COKMPUTER MISUSE ACT 1990

OTHER

- 26. NEW ACCESS RIGHTS TO COMMUNICATIONS DATA
  - 27. POSSIBLE LEGAL SOLUTIONS FOR SPAM
  - 28. VIRUSES AND HOAXES
- 

1. NEW ACT NOW CONSULTANT

Philip Jones has already spoken on our Records Management Course in April and will be doing so again in November in London. Acknowledged as an international expert on Local Government and Records Management you can him speak on an Act Now course in London in November.

See our website for a full biographies under Associates.

**FREEDOM OF INFORMATION**

2. FREEDOM OF INFORMATION – ARE YOU READY FOR 2005?

This month we lead with stories on FOI. Remember there are only 14 months to go before all recorded information will be accessible. Are you ready?

The Stationery Office has conducted a survey on FOI preparedness. The results show that three quarters of government departments have not yet budgeted for the Act. A further 33% of people questioned do not even know the dates when the key provisions of the Act come into force – including that of 1 January 2005.

The Information Commissioner has said that the public sector is not taking freedom of information seriously enough and should be taking steps now to ensure that they have procedures in place to comply with FOI obligations before its too late. He states :

“Most companies see data protection as a priority, certainly in the public sector; but not all organisations see freedom of information as being in their best interests. But this affects everyone in the public sector, even those at the most junior level. There’s a lot of work to do in preparing staff - you need to know what information you hold, where to find it, and how to make it more easily accessible.”

Freedom of Information Course on 5<sup>th</sup> Nov – Manchester – details from [www.actnowtraining.co.uk](http://www.actnowtraining.co.uk)

3. SCHOOLS PUBLICATION SCHEMES

All schools have to submit a publication scheme for approval to the Information Commissioner by the end of December this year. The Information Commissioner will soon be writing to all schools reminding them of their responsibilities. See our website for the model publication scheme for schools and notes produced by the DFES. Click on resources

4. THE LAND REGISTRATION ACT 2002 CONFIDENTIALITY ISSUES

This Act and its accompanying Rules come into force on 13 October 2003. Amongst other things, it extends the rights of the public to inspect documents which are referred to on the Land Register, including any documents submitted to the Land Registry at any time, both prior to and after the commencement of the new Rules, and including all registered leases and charges. Leases and charges are not currently open to public inspection. The new Land Registration Rules provide that a person can apply to designate part of a document as being exempt from public inspection if the relevant part contains prejudicial information. "Prejudicial" is defined as meaning "information that if disclosed to other persons would, or would be likely to, prejudice the commercial interests of the applicant" or "information that relates to an individual who is the applicant and if disclosed to other persons would, or would be likely to, cause substantial unwarranted damage or substantial unwarranted distress to the applicant or another". The Registrar will be obliged to designate the relevant part of the document as exempt if he is satisfied that the application is genuine. There are some transitional provisions. We suggest you talk to your legal department as there are some synergies between this Act and Freedom of Information.

## 5. FOI IN CONFLICT WITH OLDER ACT?

"The Chairman proposed a motion in line with Section 1(2) Public Bodies (Admissions to Meetings) Act 1960 that representatives of the press and other members of the public be excluded from the remainder of the meeting having regard to the confidential nature of the business to be transacted, publicity on which would be prejudicial to the public interest." Anyone else seen this in copies of minutes? How does it fit in with the new open regime of FOI just round the corner?

## 6. MORE PUBLIC BODIES BROUGHT INTO FOI, SOME TAKEN OUT

The numbers are growing. In a press release in July a new tranche of 48 more public bodies has been added to the list of those subject to the Freedom of Information Act 2000. These include the Intellectual Property Advisory Committee, the Office of Government Commerce and the Statistics Commission. See what's been added at <http://www.legislation.hmso.gov.uk/si/si2003/20031882.htm> and see what's been removed at <http://www.legislation.hmso.gov.uk/si/si2003/20031882.htm> These are Statutory instruments 1882 and 1883. Unfortunately the Apple and Pear Research Council is no more.

## 7. TRANSPARENCY AND FOI

The IPPR, Britain's leading progressive think tank has a site with many interesting links. Look at <http://www.ippr.org.uk/home/index.php?table=press&id=242>

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## DATA PROTECTION

### 8. NEW HSE ACCIDENT BOOK

The Information Commissioner has ruled that being able to view details of previous accidents in an Accident Book is an infringement of the Data Protection Act. Taking this on board, the Health and Safety Executive has launched a new Accident Book, which has been approved by the Commissioner. The new book allows for accidents to be recorded whilst personal details are stored securely elsewhere. It, or another compliant version, must be brought in to use by 31 December 2003.

More information on the new book can be found at [www.hsebooks.co.uk](http://www.hsebooks.co.uk)

### 9. INFORMATION COMMISSIONER'S ANNUAL REPORT

The Information Commissioner has published his annual report. It shows his office is becoming increasingly busy and those who are not complying with the Act need to be wary. The key points are that in the last twelve months:

The Commissioner's office handled just over 12,000 requests from the public on whether data protection law was being complied with 91 cases prosecutions being brought, increasing from 66 last year. There were 33 convictions for unlawfully obtaining personal data, 20 convictions for unlawfully selling personal data and just one for the unauthorised disclosure of personal data

Islington Borough Council suffered a fine of £3,000 plus an order to pay costs of £2,350 for being an unregistered holder of data under the 1984 Act. This was the largest penalty this year. See our website for an article on this case.

See [www.dataprotection.gov.uk](http://www.dataprotection.gov.uk) for the full report.

## 10. THE EUROPEAN VIEW

A useful link to current thinking in Europe on Data Protection and associated issues can be found at [http://europa.eu.int/comm/internal\\_market/privacy/index\\_en.htm](http://europa.eu.int/comm/internal_market/privacy/index_en.htm)

## 11. PROMOTING SUBJECT ACCESS

Trading of personal data in between companies is a billion-dollar business. Looome enables the average consumer to enter into this market, assemble valuable data and sell their personal information. Regarded by some as 'information prostitution', we see loome as a way to open up a fair exchange between business and the individual consumer regarding the use of personal data. See a pdf form designed to assist you to manage your personal data and a few links at <http://www.loome.org>

## 12. HUTTON ENQUIRY WEBSITE & WORD DOCUMENTS

Go to [www.dca.gov.uk](http://www.dca.gov.uk) or [www.lcd.gov.uk](http://www.lcd.gov.uk) and you'll see a link to this enquiry on the What's new page. What is clear is that emails and word processed documents are providing valuable evidence. How? Microsoft Word documents are notorious for containing private information in file headers and revision logs which people would sometimes rather not share. The government learned this lesson the hard way. The dossier contained (as is normal with Microsoft Word) the last 10 revisions made to the document and the author. The Blair government learned its lesson quickly.. Another report on Iraq that was published in June 2003 was only available as a PDF file. PDF files do not contain revision logs or hidden author information. More or less, it was the Word revision log that placed several officials on the hot seat regarding their infamous dossier. Perhaps we should require government business be done in Word.

This does throw up an interesting point about publishing your organisation's documents on the web under FOI. What else can people find out using Word's secret systems? Will it spot that you 'borrowed' the document from another organisation and passed it off as your own work? Maybe you should consider moving all your publicly published documents to pdf format which strips out such data and compresses the files as well. Is this a Records Management issue? You can buy the full Adobe acrobat if you want but there are quite a few pdf writers out there and they're either free or cheap. Use a search engine and try one.

## 13. RESPONSE TO SUBJECT ACCESS CONSULTATION

<http://www.lcd.gov.uk/consult/foi/dpsaresp.htm> has the results of 170 replies received.

## 14. ONE CLICK TO ALL PREFERENCE SERVICES

<http://www.dma.org.uk/shared/PrefServices.asp> including the new and thoughtful Baby MPS

## 15. USING THE ELECTORAL REGISTER FOR MAILSHOTS

Picked up from a bulletin board.

One of our members has obtained legal opinion on the legality of using the existing full register and the annual canvass to promote the Vote for Life Scheme run by the NHS in the light of the restrictions placed on the supply and use of the full register under part VI of the Representation of the People Regulations 2001, as amended.

The Vote for Life Scheme is described as a simple cost effective and highly successful scheme that gives residents the opportunity to consider organ donation and join the NHS organ donor register at the same time as they complete their electoral registration forms.

In the opinion received from Timothy Straker, QC, he states: "Section 10 of the Representation of the People Act 1983 requires an electoral registration officer to conduct an annual canvass for the purpose of ascertaining the persons who are entitled to be registered in the registers maintained under Section 9 of the Act.

It should be noted that a single express purpose is given for the annual canvass; no other purpose is identified. Section 10(4) identifies the form to be used for the purpose of the canvass as either a form prescribed or a form to the same effect.

The scheme provides for the donor forms to be sent out and returned with the prescribed canvass forms, in which case the annual canvass would be employed not merely for the purposes of ascertaining those entitled to be on the registers but also for the purpose of securing support for an organ donor scheme.

Parliament has laid down an exclusive purpose for the canvass, and having a second purpose offends that exclusive purpose. Parliament has indicated that particular forms are to be used and for a particular purpose. To add but one paper to that process for a different purpose may deflect some from providing the information.

Accordingly I am not surprised that the Electoral Commission has advised against incorporating the Vote for Life Scheme in the annual canvass under Section 10.

I advise that to do so offends against Section 10 because the electoral registration officer would be acting for two purposes as opposed to the single purpose identified by the Act. Further one of those purposes has nothing to do with the electoral process. Regulation 94(3) provides that an electoral registration officer may not make use of any information contained in the full register otherwise than in accordance with an enactment. This exercise would seek to use as information the full register because such information is used in the canvass.

Accordingly, regulation 94(3) supports the proposition that the electoral canvass cannot be used to promote the Vote for Life Scheme. To contravene regulation 94(3) constitutes (regulation 115) an offence leading to liability on summary conviction to a fine.

Recent changes have led to the existence of both a full register and an edited register. There is no restriction on the sale of the edited register or on the uses made of it by purchasers. A copy of it has to be supplied on payment of a fee as set out in the 2001 Regulations. It is perfectly proper for a properly empowered body to acquire the edited register and use it for a purpose such as the promotion of the Vote for Life Scheme.

In my view an electoral registration officer ought to be concerned exclusively with the electoral process. The Vote for Life Scheme ought not to accompany the annual electoral canvass. The information in the

edited version of the register can be used by a body which has secured a copy of the edited register for that purpose."

It appears that many authorities are insisting that their ERO send out organ donor forms with the coming canvass forms. This legal opinion may result in some having second thoughts!

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## DATA SHARING

### 16. DATA SHARING (1)

According to a report published by the Fraud Advisory Panel (FAP) in July, identity fraud costs the UK £1.3 billion each year and the Government needs to do more to crack down on the problem. The solution, according to the report, is to increase data sharing between government and business, and between businesses. Could this be the start of the government pushing a Data Sharing Act? The full report can be read on the website below:

<http://www.fraudadvisorypanel.org/publications1.html>

### 17. DATA SHARING AND IRT

New Government plans could see an electronic record created for every child in the country to help agencies share information on children at risk and trigger early intervention. The project is called IRT (or it may soon change to IRS) and is much bigger than you think.

Child Protection is only the tip of the iceberg. It only deals with a few thousand children each year. There are 11 million children in mainstream education and health care. This is what IRT will be targetting. It's not a small affair. It will involve serious resources. It will aim to be a hub that puts many agencies working with children in touch with each other. The agencies will remain data controllers but will share the fact that they hold information on a child with the hub. The hub will not hold that information. There are many lawful reasons for passing data through the hub, most of which you can find in the guidance from CYPUP.

<http://www.cypu.gov.uk/corporate/publications.cfm> has 3 downloads about IRT

It is quite likely that you as a data protection specialist will be called to meetings of IRT teams. Most councils have recruited IRT managers. This is not going to go away. The Laming report on the Victoria Climbié case is leading to a massive exercise in information sharing. Money is available and if you meet certain targets by end of September 2003 including delivering of training in DP to all partners in IRT projects you will be on the way to accessing this resource

To see how one council managed this issue look at Sheffield's IRT project predictably called SHIRT. <http://www2.sheffield.gov.uk/shirt/default.asp> is the site of Sheffield's project and has an attempt to explain how the data sharing works.

Some useful presentations documents and are online at <http://www.northmerseylis.nhs.uk/lisdev/documents/showdocs.asp?catg=North%20West%20IRT%20Events>

which help to set the scene particularly the presentation by Julie Innes.

Theses measure form part of a package of far-reaching reforms to children's services in a new Green Paper unveiled by Ministers last week, which proposes "sweeping away legal, technical and cultural

barriers to information sharing so that, for the first time, there can be effective communication between everyone with a responsibility for children." To achieve this, all authorities will be required to set up a 'local information hub', profiling every child in their area, which relevant agencies could readily access and also 'flag up' on the system any concerns about a particular child. To take forward such information systems, the Government is providing up to £1 million for 10 Identification, Referral and Tracking 'Trailblazer' projects involving 15 local authorities, which should be producing detailed information on outcomes by late summer 2004. Legislation to enable greater information sharing to expected to be pushed through in the current parliamentary sessions. Interested parties have until 1 December 2003 to respond to the proposals. The Green Paper can be found at: <http://www.kam-online.com/links?95b>

## 18. DATA SHARING IN GENERAL

A meeting was held in August at the ODPM and interested parties were invited to discuss Data Sharing and the barriers to achieving it. Most organisations present said they had no problems with the technical issues of matching and sharing but the first hurdle was to demonstrate that it was lawful. Shepways COATS project about change of address had slowed down to a stop when advice was received that there were no lawful vires to proceed with it, although we hear it is now starting up again. See some of the arguments at <http://www.shepway.gov.uk/pathfinder/welcome.asp>

There is the view that The Local Government Act 2000 gives Local Authorities the power of well being do anything designed to promote social well being and these are the vires that permit data sharing. Judge for yourself not by reading the Act but the explanatory notes which are almost in plain English. See note 4 through to note 25. <http://www.legislation.hmso.gov.uk/acts/en/2000en22.htm>

Picked up from a Bulletin Board

“Given the E -envoys recent statement & issues surrounding call centres & the like where sharing of data seems the crunch issue, the sticking point seems to be, for local authorities, the legal / statutory power to enable data that is collected for purpose A to be used for purpose B, & some interpretations that I have seen that suggest that anything less than an express statutory power to enable data to be used for purpose A and B will fail.

Has anyone considered the new powers under Part 1 Local Government Act 2000 as a source of power to allow data collected for purpose A, subject to both the requirements & limitations in the LGA 2000 & the limitations/issues in the DPA 1998 regarding (eg) schedule 2, to be used for purpose B?

The Government Guidance on the LGA 2000 states (with annotations):

The breadth of the power is such that councils can regard it as a 'power of first resort'. Rather than searching for a specific power elsewhere in statute in order to take a particular action, councils can instead look to the well-being power in the first instance and ask themselves:

- \* Is the proposed action likely to promote or improve the well-being in our area?
- \* Is the primary purpose of the action to raise money?
- \* Is it explicitly prohibited on the face of other legislation?
- \* Are there any explicit limitations and restrictions in of other legislation?

If the answer to the first question is 'Yes' and to the next two questions 'No', then a council can proceed with the proposed action, subject to the answer to the fourth question, i.e. any restrictions or limitations that may apply by virtue of being spelt out on the face of other legislation.

Has anyone tried applying this to internal data sharing between departments / external data sharing between say the authority & other bodies?"

DCA (or Decaff) as it is commonly known, intends to publish a toolkit on datasharing by the end of this year. This will contain legal guidance and suggest overarching principles. Individual agreements will have to be constructed but they are collecting examples of these.

## 19. IDENTITY THEFT

Sixteen people have been arrested in connection with a forgery ring, concentrating most of their crimes in Tarrant County, Texas. The suspects had specialized roles in the operation, such as stealing mail or passing counterfeit checks, investigators said. "They would interchange information, they would share identities, they would teach each other scams," Arlington, TX, police Detective Kyle Dishko said. Most of the members of the eight-man, eight-woman group have been arrested on forgery, identity theft and drug charges. Read the full story at <http://www.dfw.com/mld/dfw/news/6744725.htm>

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## RECORDS MANAGEMENT

### 20. FOI – THE RECORDS MANAGEMENT VIEW

With the impending January 2005 deadline for full implementation of the Freedom of Information Act, the need for information and guidance is greater than ever.

The "Essential Records Management Web Resources: Freedom of Information" article by Jamie Burton (published recently in the Records Management Society Bulletin) aims to provide pointers to quality FoI information resources. The article is now also available online from the RMS Web site at <http://www.rms-gb.org.uk> Click on Resources and Freedom of Information.

### 21. LOCAL AUTHORITY RECORDS MANAGEMENT

Trying to classify your services so you can effectively manage them? Try the LAWS project. They offer downloads, roadshows and an online forum.

<http://www.esd-toolkit.org/laws/>

### 22. CONSULTATION FROM NATIONAL ARCHIVES

The National Archives formerly known as Public Records Office has launched a consultation exercise on whether we need to revise our national records and archives legislation.

Print copies are on their way to a wide range of stakeholders - all UK government departments, all local authorities, all places of deposit for public records, members of the Advisory Council, the Inter-departmental Archives Committee and the Archives Task Force, the devolved administrations, professional societies and bodies such as the National Council on Archives, and user groups but if you can't wait for a print copy, or are not on that list, you can read it on our website at

<http://www.nationalarchives.gov.uk> under What's new

### 23. HUMAN RIGHTS HAMPSHIRE COUNTY COUNCIL v GRAHAM BEER (2003)

The combined effect of the facts that: (i) a private company owed its existence to a county council and was set up by that council using its statutory powers; (ii) that the company stepped into the shoes of the county council and ; (iii) that the council assisted the company in a number of ways, was sufficient to justify the conclusion that the company was acting as a public authority within the meaning of s.6 Human Rights Act 1998 and that therefore its decisions were amenable to judicial review. This case means all councils need to examine the various companies they use to deliver services including contracted out functions, housing stock transfer companies and leisure trusts etc. They must consider whether these

companies need to know and implement all the information laws set out in the DPA, HRA RIPA, FOI etc.

## 24. PRIVACY LINK

The Guardian has published an excellent article about 1984 and privacy in 2003. see below:

<http://www.guardian.co.uk/online/story/0,3605,979994,00.html>

## 25. GOVERNMENT PLANS TO UPDATE COMPUTER MISUSE ACT 1990

The Home Office has announced that it will review the UK's anti-hacking law. The Computer Misuse Act dates back to 1990, having been drafted in the late 1980s. It is ill-equipped to deal with acts like denial of service attacks, where a server is deliberately flooded with requests for information, causing it to collapse due to overloading. The details of the strategy will be published by the Government in February 2004.

## 26. NEW ACCESS RIGHTS TO COMMUNICATIONS DATA

Councils will soon be able to access communications data to investigate crimes, protect national security and protect public safety. They will also be able to use the powers to collect taxes. Initial plans to revise legislation were dubbed the "snooper's charter" when announced by Home Secretary, David Blunkett, last summer.

Under the revised legislation, fire authorities and ambulance services will be given automatic access to phone and internet data along with six other state agencies. 500 other bodies, including councils, will get more limited rights upon application. All the above bodies will be able to access subscribers' names and addresses and details of telephone calls and e-mails made and received. They will also get hold of mobile phone operators' data that pinpoints a user's location within a few hundred yards. They will not be able to listen to calls. Only designated senior officials will be able to order investigations. There will be regular checks by the Interception of Communications Commissioner, Sir Swinton Thomas, to ensure powers are not being abused.

The three draft RIPA SIs on communications data, directed surveillance and covert human intelligence sources, and intrusive surveillance, together with explanatory memoranda are on the website under RIPA "What's New" at:

<http://www.homeoffice.gov.uk/crimpol/crimreduc/regulation/new.html>

This new law represents a massive extension of the powers of local authorities. It will, like other powers under the Regulation of Investigatory Powers Act, require a massive training and awareness exercise. We are running a seminar on 23<sup>rd</sup> October at the National Railway Museum in York to examine the full extent of surveillance powers including the new Employee Surveillance Data Protection Code. Click on [www.actnowtraining.co.uk](http://www.actnowtraining.co.uk) for details.

We are also able to provide in house training in this area.

## 27. POSSIBLE LEGAL SOLUTIONS FOR SPAM

According to MessageLabs, 55.1% of all emails sent in May 2003 were spam. It is thought that as few as 150 spammers are responsible for 90% of junk mail. The emails consume massive amount of network bandwidth, memory and storage space. They require ISP's to hire additional employees to block spam and answer customer complaints and force ISP's to lose revenue due to customer defections and new customer acquisition costs to replace customers who have defected. Victims may well be able to take action in many countries. For instance, it has been reported that Microsoft have filed suits in the UK against defendants alleged to have illegally harvested Microsoft e-mail addresses for use in building spam mailing lists.

A summary of legal remedies has been prepared by Central London Solicitors, PCB who specialize in commercial and internet fraud. Click on [www.actnow.org.uk/Pages/spamlegal.doc](http://www.actnow.org.uk/Pages/spamlegal.doc) Further details of the firm can be found by visiting their website at [www.pcblitigation.com](http://www.pcblitigation.com)

## 28. VIRUSES AND HOAXES

Act Now recently added another button to the menu to allow subscribers to check out whether the latest virus warning they have received was true or a hoax. This has a live feed from Sophos, well known anti virus software company which can save you a lot of time. Other ways of getting the message across include humour. Have you heard about the Gullibility Virus? Read about it at [www.actnow.org/Pages/gull.doc](http://www.actnow.org/Pages/gull.doc)

Another useful and humorous source of virus info is Urban Legends Reference Pages at <http://www.snopes.com>

## And finally... . INFORMATION COMMISSIONER RECRUITS

Avid dataprotection.gov.uk watchers will have seen recent advertisements for new positions within the Information Commissioners Team. Apparently the number of assistant Commissioners will increase to 9, each one being responsible for different areas. Remind anyone of a major film of recent years? 'One ring to rule them all and in darkness bind them' Can we expect to see the nine abroad in the land? Roaming the land seeking out non compliance? The Nazghul of the information society? Just wishful thinking.

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### 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 50 members and quarterly meetings in the region. You can also take advantage of free/discounted courses. Click on <http://groups.msn.com/YorkshiretheHumberDPForum> and no you don't have to live in the region.

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### 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.

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