



## October 2004 Newsletter

Welcome to the Act Now Newsletter on Data Protection, Freedom of Information, Privacy and Information Management issues in the Public Sector. This newsletter contains a mixture of articles and links to other websites. We cannot be responsible for the content of other sites. 2,753 subscribers on 04/10/04. Next newsletter January 2005.

If you've received this from a colleague you can subscribe in your own right by logging on to [www.actnow.org.uk](http://www.actnow.org.uk). You can also unsubscribe on the same page. Please read the disclaimer and other important information at the end of the newsletter.

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*Ibrahim Hasan & Paul Simpkins*

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 various Information Commissioner's office throughout the UK delivering the keynote address. We offer courses on

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

Details of all our training courses can be found at [www.actnowtraining.co.uk](http://www.actnowtraining.co.uk)

In addition to this programme we are available to come to your site and deliver training in information issues. Contact [ihasan@lycos.co.uk](mailto:ihasan@lycos.co.uk) or [paulsimpkins@btinternet.com](mailto:paulsimpkins@btinternet.com) or [info@actnow.org.uk](mailto:info@actnow.org.uk)

1. We have moved. Our new offices have new phone and fax and email. Why not print out this pdf and keep it for reference. <http://www.actnow.org.uk/ActNowMoving.pdf>

2. A warm welcome to Paul Simpkins who has finally left his position as Senior Information Policy Officer at Bradford Council to join Act Now on a full time basis. Paul has an impressive record as a practitioner and speaker on FOI and data protection issues throughout the UK and abroad. You can read his full CV on our website – click on consultants

Paul will be spending his time on developing Act Now's range of external courses as well as servicing the growing need for the public sector to have in house training in these areas.

## **FREEDOM OF INFORMATION SECTION**

3. Freedom of Information – 100 Days to go Conference

More than 50 different organisations were represented at the first Act Now FOI Conference held in London on 22<sup>nd</sup> September 2004. Speakers included Maurice Frankel of the Campaign for Freedom of Information, Phil Boyd of the Information Commissioner's Office, Gervase Hood of the DCA and various other local authority expert practitioners and lawyers. The highlight was a presentation by Melanie Campbell, an investigator from the Irish Information Commissioners Office. Melanie gave a fascinating insight in to the impact of FOI in Ireland and the kind of requests received.

We have a few spare delegate packs which we are offering for sale on a first come first serve basis (price £49 plus vat) Please fax your details quoting a purchase order number to us at Act Now Training Limited Fax number 01924 451129

3. The Information Commissioner speaks

Our director and training consultant, Ibrahim Hasan, addressed an FOI implementation conference for the Civil Service this week. Richard Thomas also addressed the audience and made some interesting points. They are listed here (in no particular order of importance):

Whilst authorities should be aware of what is technically an FOI request they should also be aware of the "business as usual" concept. Not every request has to go through a formal FOI process.

Refusal notice should give a clear explanation of why information has been refused and should not simply reiterate an exemption word for word. You should say which exemption applies and why.

The Commissioner is still working on the definition of a vexatious request. He will give it a "generous interpretation". He does not feel that he should encourage people who are clearly being unreasonable or petty.

Decisions of the Information Commissioner will be published on his website subject to resources, if the volume is high. However these decisions are not legally binding on public authorities nor do they create legal precedent.

With regard to the story in the Municipal Journal where Richard Thomas was headlined as saying salaries of chief executives should stay private, he said that the headline was misleading. He has written to the MJ pointing this out. What he did say was that salary banding should be disclosed and there may be a case for disclosing actual salary but the jury was out on that one and the human rights of the individuals had to be considered.

## 6. Fees order hors d'oeuvre

This article has appeared in the Guardian, with the headline Blair to drop fees for access to data.

It starts:

"Tony Blair has agreed to scrap most of the fees levied for making use of the Freedom of Information Act, as part of an effort to regain disillusioned liberal voters at the election."

and includes this statement:

"It is expected that Lord Falconer, the constitutional affairs secretary, will announce that charges for applications for information under the Freedom of Information Act will not be levied so long as the cost of gathering the information does not exceed £600 "

<http://www.guardian.co.uk/guardianpolitics/story/0,,1309064,00.html>

More free guidance has been published. ... this time from the National Audit Office.

<http://www.nao.org.uk/publications/foiguide.pdf>

## 7. Local Government Information Access Regime Consultation

Many delegates on our courses have difficulty understanding how access to minutes and background papers of committees will change through FOI. The Office of the Deputy Prime Minister has launched a public consultation on changes to the Local Authority Access to Information regime. Notably a public interest is added to some exemptions and the current numerous commercial confidentiality exemptions are consolidated into one exemption

that mirrors the FOIA. If you would like to comment yourself on the consultation documents they can be accessed from:

[http://www.odpm.gov.uk/stellent/groups/odpm\\_localgov/documents/page/odpm\\_locgov\\_030884.pdf](http://www.odpm.gov.uk/stellent/groups/odpm_localgov/documents/page/odpm_locgov_030884.pdf)

## 8. The FOE RFI

Picked up from a bulletin board...

Have any other Local Authorities received a request from Friends of the Earth asking for "Copies of all current contracts between our waste disposal authority and any company for the disposal, keeping or treatment of waste as referred to in Part II of schedule 2 of EIR 1990.

The answer is yes many northern Councils have received this request. At a meeting of the Yorkshire & Humber group recently the consensus was that we are obliged to respond as there are regulations in force which require us to do so. A taste of things to come? You can look at the FOE Campaign on Waste by clicking on <http://www.foe.co.uk/campaigns/waste/> but it doesn't seem to refer to the request received by many councils. (Website last updated Feb 2004)

## 9. New Guidance from the Information Commissioner on exemptions

Awareness Guidance No 13: Relations within the UK

Applies to relations between the UK government, National Assembly for Wales, Scottish administration, and executive committee of the Northern Ireland Assembly.

Awareness Guidance 10 (Defence Exemption)

Awareness Guidance 12

(When is information caught?)

<http://www.informationcommissioner.gov.uk/>

## 10. DCA consultation

Dr. Lydia Pollard, MBA, CEng. e-Government Strategic Advisor, IDeA writes

You may be aware that there is shortly to be a House of Commons enquiry to investigate how LAs are progressing with FOI, what support they have been given by central govt, whether this has been sufficient and what additional support they require (see below for details).

I have been asked to give evidence on behalf of local authorities. There will also be a councillor, a chief executive and a FOI practitioner giving evidence. I have some information from local authorities but welcome any additional information. I am particularly looking for details of what have been the main obstacles for your authority; whether you feel that the information you received from central government has been useful (if not why not) and timely; and what do you feel still needs to be done by central government to help your authority implement FOI.

I am required to give evidence on 19 October so I would appreciate any replies well before then so that I can collate them. Contact [lydia.pollard@idea.gov.uk](mailto:lydia.pollard@idea.gov.uk)

Many thanks for your help.

This is the text of the press release

## CONSTITUTIONAL AFFAIRS COMMITTEE LAUNCHES INQUIRY INTO IMPLEMENTATION OF THE FREEDOM OF INFORMATION ACT

Details of a new inquiry that will scrutinise Government preparations for the full implementation of the Freedom of Information Act 2000 were announced today by the Constitutional Affairs select committee.

The decision to launch an inquiry precedes full implementation of the Act in January 2005 and follows an earlier evidence session with the Information Commissioner, Richard Thomas, and the Chief Executive of The National Archives, Sarah Tyacke CB.

Launching the inquiry, Committee Chairman Rt Hon Alan Beith MP said: "With less than 4 months before the coming into force of the Freedom of Information Act, thousands of public bodies are facing considerable challenges in meeting the Government's ambitious timetable for implementation. We need to ask whether there has been sufficient time given for that preparation and whether support from central government has been effective and timely. ~

"We must be absolutely certain that the implementation of the Act proceeds smoothly.

"We will look at the reasoning behind the Government's decision to introduce the Act through a 'big bang' rather than phasing in its implementation, as well as considering the question of the appropriate charging regime that will accompany full implementation."

### 11. Advanced FOI Course

Now that you've got your staff all trained and are gearing up to 1<sup>st</sup> January, you may want to start thinking about training for FOI decision makers and advisers. We have developed an interactive workshop in this area looking at the key decisions and issues to be considered. It is packed full of case studies and exercises to try and tease out and discuss all those difficult issues. We are running two courses before Xmas –one in Manchester on 8<sup>th</sup> November and the other one in London on 14<sup>th</sup> December. It is likely that we'll be running one of these a month in the Spring 2005 programme.

Full details on our website - warning - those who book should be prepared to work hard on the day!

### 12. INTERNATIONAL RIGHT-TO-KNOW NEWS STORIES

"Health Risk Kept From Residents for 2 Years" By Ann Rees, The Toronto Star, 20 September 2003

The findings of a year-long investigation conducted by the Atkinson Fellow in Public Policy revealed how the Canadian government tries to obstruct access requests. Specific records exposed by the study showed how in one instance the government had euthanized 7,209 raccoons from 1999-2002 for rabies, but that only 16 raccoons had tested positive for the

disease. The document noted how release of this document may be detrimental for public relations as the cost of the program was \$2 million. In another case, documents showed how Ontario's environment ministry waited two years to inform local health authorities that carcinogenic chemicals had contaminated the groundwater in one neighborhood. When a local resident filed a FOI request that would have covered documents on the two-year wait, he was instructed to limit the dates of his search, which in effect excluded the damaging information from the request. Former workers in a nearby factory claim that at least 19 of their co-workers have already died of cancer.

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"Transparency for Land Deal" Shanghai Daily News, 20 September 2003

The Shanghai Housing and Land Administrative Bureau will release information on land plots available for open bidding every month in order to improve transparency in land leasing transactions and to curb corruption in the bidding process. The new transparency process will allow interested developers equal access to information on land and will go so far as to report any manipulation or abuse of the bidding system. If any transaction is accomplished through backchannel negotiations or favoritism, the bid will be reviewed and annulled. To support urban renewal projects in Shanghai the bureau has indicated that low-income residential housing projects will receive preferential treatment.

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"Kohl Files Could Be Opened" International Herald Tribune, 18 September 2003

An administrative court ruled the East German Stasi secret police files on former Chancellor Helmut Kohl could be released, in effect overturning a March 2002 federal ruling. Researchers, journalists and historians have asked to see Kohl's 2,500-page file, which Kohl himself has viewed and has appealed the decision of the court's to disclose. There continues to be speculation that the file may shed light on a party financing scandal that discredited Kohl and damaged his conservative party. The head of the agency overseeing the archives stated that she believed Kohl should be allowed to defend himself against the file, but that his file should be released as the former leader should not be exempt from laws applying to others.

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'Right to Information' Comes in Handy for Get[ting] Municipal Work Done"  
Press Trust for India, New Delhi, 11 September 2003

Residents of New Delhi have begun to use the Right to Information Act to compel authorities to finish long-pending civic projects. In the low-income sections of city the change is apparent as development projects that have been pending for over 20 years are finally being completed. One resident of Sunder Nagari who was tired of waiting for the authorities to finish installing a sewer that had been under construction since 1983, applied for documents recording the progress on the project. The sewer was quickly completed. The Right to Information Act, enacted in Delhi in 2001 is empowering the community as it affords them the right to hold their officials accountable.

More of these on our website.

<http://www.actnow.org.uk/foistories.pdf>

**FREEDOM OF INFORMATION (SCOTLAND) SECTION**

### 13. Summary of Scottish Freedom of Information Conference 6<sup>th</sup> October 2004 Edinburgh

An excellent set of speakers made the Edinburgh Conference a worthwhile event.

Ibrahim Hasan, Information Law Expert, Act Now Training Limited  
Hazel Moffatt, Associate, Sheppard and Wedderburn Solicitors  
Margaret Keyse, Head of Investigations, Scottish Information Commissioner's Office  
David Goldberg, Scottish Campaign for Freedom of Information  
Tim Ellis, Head of Freedom of Information Unit, Scottish Executive  
Allan Graham- Information Compliance Officer, Stirling Council  
Fintan Butler, Senior Investigator, Irish Information Commissioner's Office

For a detailed article on the subjects covered see <http://actnow.org.uk/scot.pdf>

### 14. FREEDOM OF INFORMATION IN SCOTLAND

One of the best parts of the Edinburgh conference was a presentation by Hazel Moffat of Sheppard and Wedderburn Solicitors on FOISA and Procurement. She discussed the kind of commercial requests which public authorities will receive and the likely exemptions which may apply.

Hazel and Ibrahim Hasan have co authored an article on the legal issues around FOISA , contracts and procurement. This will be published on our website shortly. You can find it by clicking on Articles. Whilst there you may also wish to see the FOISA request handling flowchart.

#### Section 60 Codes Finalised

The Section 60 Code on the right of access and duty to advise and assist has now been finalised. The final version of the Code was laid before the Scottish Parliament on 6 September 2004 and is now available on the Scottish Executive website in pdf format: [www.scotland.gov.uk/library5/government/sedfpa.pdf](http://www.scotland.gov.uk/library5/government/sedfpa.pdf)

#### Fees Regulations Finalised

Following formal consultation with the Scottish Information Commissioner, both sets of Fees Regulations have been laid before the Scottish Parliament. As soon as the Regulations have been approved a link will be available on the Scottish Information Commissioners website: [www.itspublicknowledge.info/links.htm](http://www.itspublicknowledge.info/links.htm).

The draft position has not changed. Scottish Public authorities will be able to charge 10% of the prescribed costs (capped at £600) of retrieving and supplying the information. The first £100 of the £600 will be free. So in effect the maximum that will be charged is £50 plus disbursements. Public authorities will not have to supply information costing more than the £600 limit.

The provisions for aggregating costs of FOI requests where individuals were acting in concert have been dropped. A summary of the fees situation can be found on the Scottish Executive website [www.scotland.gov.uk](http://www.scotland.gov.uk)

#### Survey on FOISA Compliance

The Commissioner recently commissioned research to establish the level of public awareness

of and attitudes to freedom of information in Scotland. Progressive Partnership carried out the work in August 2004 and the results will be released on Monday 4 October. The report will be available at [www.itspubliknowledge.info](http://www.itspubliknowledge.info) in early October.

As expected, the results show low levels of awareness of freedom of information among the general public prior to any major public promotion of the Freedom of Information (Scotland) Act. The research will be repeated in early 2005 to assess the success of the Commissioner's promotional campaign to increase public awareness of the new rights and how to use them.

#### New Guidance from the Scottish Information Commissioners Office

##### Section 29 Exemption – Formulation of Scottish Administration Policy

Some more will be published by the end of next week

#### Difference between FOI and FOISA

Many of you working with FOI legislation will be aware that the Scottish and UK FOI Acts may appear very similar at first glance but that there are many subtle variations which mean the application is quite different. To guide us through these variations a table has been produced comparing the Scottish and UK FOI legislation. This useful table is now available at [www.itspubliknowledge.info/comparativetable.htm](http://www.itspubliknowledge.info/comparativetable.htm).

The table was produced for use by staff at the Office of the Scottish Information Commissioner and should be considered neither definitive nor as constituting legal advice.

## **DATA PROTECTION & PRIVACY SECTION**

### 15. DPA AND PRIVACY STORIES

#### NHS number to be protected by law

The Government has told Parliament that it intends to make the NHS number a 'general identifier' as defined by the Data Protection Act 1998. Once the relevant regulations are enacted, any organisation using the NHS number for an unauthorised purpose would be processing it unlawfully.

Proposals for draft regulations have been put forward by the Health Records and Data Protection Review group" and these recommendations are "currently being considered to ensure that policy is developed in line with the Children Bill". The databases associated with the Children Bill are to carry the NHS number in each record, and this unique identifier will, therefore, be accessible and used by a wide range of public authorities.

The DoH legislative proposals to protect the use of the NHS number differ completely from the approach adopted for other Government-issued identification numbers. At the same time as the DoH promised wider protection for the NHS number, the Government confirmed that the national-insurance and the pupil-identification numbers would not be specified as general identifiers under the Data Protection Act

#### Banks email DPA error

HFC Bank has admitted that it breached the Data Protection Act when a member of staff sent

out e-mails to customers that revealed the e-mail address of all 2,600 customers to whom the message was being sent, according to the BBC.

Automated responses from some recipients were also sent to all customers on the list, revealing further personal details – such as mobile phone numbers – and exacerbating the problem. The Information Commissioner has decided to take no action.

Abuse of e mail and internet is a big problem for local authorities. Those who carry out surveillance of these media should look at RIPA and the Lawful Business Practice Regulations to find out how to do so lawfully. An article entitled surveillance monitoring and the law goes into more detail and is available on our website.

We are also covering this topic in detail on our Surveillance Law and RIPA course on 19<sup>th</sup> November 2004 in Leeds.

### Parents Right to Know

DP in the spotlight again – can parents access information on behalf of children?

[http://www.guardian.co.uk/uk\\_news/story/0,,1294586,00.html](http://www.guardian.co.uk/uk_news/story/0,,1294586,00.html)

"The government has refused to give the family of a British prisoner at Guantánamo Bay details of the ill-treatment he alleges he suffered at the hands of his US captors, blaming the Data Protection Act, the Guardian has learned."

Our ever popular course on data protection and data sharing may shed light on this area. There are still some places left for the London course.

### Education Sector - Reissue of HESA Collection Notices

HESA produces collection notices that describe what happens to the personal data submitted to HESA as part of the HESA records. The three collection notices (student, staff and destinations) have been reviewed by HESA and its statutory customers in light of some recent developments. These new notices are enclosed within this letter and can also be found on the HESA website at

<http://www.hesa.ac.uk/dataprot/collnotices.htm> which includes the Welsh translations.

HESA also produces the document 'Data Protection Guidance for the HESA Records' which gives supporting information to institutions. This document has been reissued. It can also be found on the HESA website at [http://www.hesa.ac.uk/dataprot/HEI\\_DPguidance.htm](http://www.hesa.ac.uk/dataprot/HEI_DPguidance.htm)

### US CIRCUIT RULES AGAINST JAILCAMS

On August 6th, the Ninth Circuit Court of Appeals affirmed a lower court decision holding that a sheriff in Maricopa County, Arizona, violated prisoners' rights by using webcams to broadcast them being booked and held in cells. The sheriff had argued that Webcasts deterred crime and showed the public how jails work. Judge Richard Paez wrote that the Webcasts amounted to little more than a "reality show" and went beyond what would be considered a reasonable deterrent to crime. "Exposure to millions of complete strangers, not to mention friends, loved ones, co-workers and employers, as one is booked, fingerprinted, and generally processed as an arrestee, and as one sits, stands, or lies in a holding cell, constitutes a level of humiliation that almost anyone would regard as profoundly undesirable," Paez wrote. The decision in *Demery v. Arpaio* may be found at

[http://www.ca9.uscourts.gov/ca9/newopinions.nsf/870530A1FDABD79688256EE800580191/\\$file/0315698.pdf?openelement](http://www.ca9.uscourts.gov/ca9/newopinions.nsf/870530A1FDABD79688256EE800580191/$file/0315698.pdf?openelement)

#### 16. IRT/IRS/ISA note

Despite the Children Bill and the juggernaut progress of the IRT project there are still concerns out there.

<http://www.communitycare.co.uk/articles/article.asp?liarticleid=46229&liSectionID=22&sKeys=isa&liParentID=26>

#### 17. Following on from Soham

The Bichard Report is now well read and will be revisited soon but here's the follow up from Sir Christopher Green which looks more closely at the Social services issue.

<http://image.guardian.co.uk/sys-files/Society/documents/2004/07/21/seriouscasereviewreportfinal.pdf>

#### 18. Unis & DP

An old but useful document about how to run an alumni programme.

<http://www.beney.org.uk/dataprot/dpsummary2000.pdf>

#### 19. CCTV

Although the Durant ruling has implications for small business usage this is a useful article on what applies in the area of CCTV. Current thinking is that although fixed cameras may fall outside the scope of the Act it is still good practice to use appropriate signage and work to codes of practice.

<http://www.cctv-information.co.uk/dataprot/dpacctv.html>

#### 20. RIPA/RIPSA and Surveillance Law

RIPA : Spoc Accreditation Course

Regular readers will know that from 5<sup>th</sup> January 2004 local authorities and other public authorities such as fire ambulance and the health sector can access certain communications data under the Regulation of investigatory Powers Act Access to Communications Data Order.

This includes the power to find out who owns a mobile phone number and who set up a website or email address. If this is new to you see our RIPA alert which was issued earlier this year on the website or [click here](#)

All public authorities wishing to use these new powers must have a Spoc in place. This is a Single Point of Contact who will liaise with the communication Service Providers. All SPOCS need to do an approved Home Office training Course and pass an exam. This must be done by 31<sup>st</sup> March 2005. Only a handful of companies are approved by the Home Office to run this course. Act Now was one of the first.

We recently ran our first course in London on 23<sup>rd</sup> and 24<sup>th</sup> September. Feedback was excellent and all the candidates passed the exam with flying colours

The next course is on 25<sup>th</sup> and 26<sup>th</sup> November in London

The following courses are also planned :

Late January : Manchester

February: London

March : York

For more details see the website or e mail us at [contact@actnowtraining.wannadoo.co.uk](mailto:contact@actnowtraining.wannadoo.co.uk)

#### RIPA/Spoc and Scotland

Whilst Scotland has its won RIPA known as RIPSAs for some kinds of surveillance, Scottish Public authorities still have to follow RIPA for accessing Communications Data. Therefore the Scottish authorities can attend any SPOC course. However We are also planning a course for Scotland in the middle of January in Perth. Places are likely to be limited so you can provisionally reserve a place by emailing us [contact@actnowtraining.wannadoo.co.uk](mailto:contact@actnowtraining.wannadoo.co.uk)

#### Designated Person and Authorised officers Training

Whilst there is nor legal requirement to train those who authorise activities under RIPA it is certainly recommended by the Home Office and the Surveillance Commissioners. With this in mind Act Now is running a course on RIPA exploring all its relevant provisions and the importance of human rights:

Surveillance Law and RIPA : 19<sup>th</sup> November Leeds

This may be a good course to send investigating officers as well as those authorising officers. The website has full details including an online booking form.

## 21. RECORDS MANAGEMENT

This is a key theme running through FOI and some guidance on this subject is available from various sources.

We are also running a number of RM courses with Philip Jones from Staffordshire County Council. Recent developments Philip is also running an advanced RM course implementing the ISO standard. Places are very limited so book now to avoid disappointment.

If this goes well there will be many more in the new year. Let us know if you are interested.

[RM and Health](#)

The specific section of HSC 1999/053 that relates to retention and disposal schedules is Appendix B, which can be downloaded in PDF format from here:

<http://www.dh.gov.uk/assetRoot/04/03/54/59/04035459.pdf>.

If you have broader interest in records management in the health sector, you might also want to have a look at the Health Care Standards Unit site, which include a Controls Assurance document on records management. This is in PDF or Word format and can be downloaded from here:

[http://www.hcsu.org.uk/standards/standard/records\\_management.htm](http://www.hcsu.org.uk/standards/standard/records_management.htm).

## 22. Useful Links

### Email scams

There's junk email and then there's phishing and blagging and steganography. Find out more about spammers and their tricks at these two sites

<http://www.michaelhorowitz.com/bademails.html>

also <http://www.eweek.com/article2/0,1759,1644828,00.asp>

### See your email from anywhere

Just click on [www.mail2web.com](http://www.mail2web.com) supply your email address and password and you can see your email. Won't work with work email but works with btinternet. Try it and see.

## 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 are experienced in the public sector and bring up to date expertise to the training courses. Contact Act Now for details.

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