



## CFoIS - Promoting the Right to Information in Scotland

### Informing the LOIPR on Scotland, UK Submission from CFoIS to the UN Human Rights Committee

#### Overview

The Campaign for Freedom of Information in Scotland (CFoIS) has prepared this submission to inform the deliberations of the UN Human Rights Committee (HRCtte) on the 'List of issues prior to reporting' (LOIPR) for the United Kingdom on 8<sup>th</sup> March 2020 at its 128<sup>th</sup> session. The CFoIS submission focuses on Article 19 (2) of the ICCPR<sup>1</sup> as access to information enables people, journalists, Bloggers, civil society and NGOs to be better informed as a right and as a defence to 'fake news'. CFoIS believes that accessing information is a gateway to all our rights.

In 1999 the Scottish Parliament re-convened and access to information rights fell within its devolved competence. The Freedom of Information (Scotland) Act (FoISA) was passed which set out rights and duties if the information requested relates to devolved matters such as health, housing, education, child protection, social care and transport. Therefore, CFoIS requests that the Scottish Government be held to account for the effectiveness of FoISA and compliance with Article 19 in the HRCtte review of the UK. CFoIS is concerned that freedom of information (FoI) rights are being weakened through stealth, omission, by changes in how publicly funded services are delivered plus the cumulative impact of funding cuts which have led to reductions in staff to deliver, and help deliver, FoISA duties. Whilst there is a lot of very good practice, there is a need for reform and we now provide evidence of issues of concern which are drawn from existing reports and submissions.

**Issue 1:** The Scottish Government should commit to strengthen FoISA through legislative reform and reinstate a powerful right for the public to hold the public sector to account. Reform should include a duty on pro-active publication and a timetable should also be published for the legislative reform of FoISA.

**Issue 2:** The Scottish Government should undertake to extend the designation of bodies under Section 5 of FoISA so that publicly funded services and services of a public nature are covered.

**Issue 3:** The Scottish Government should place RTI and ATI within the human rights framework as a matter of principle and, to emphasise the interdependence of rights which includes acknowledging the importance of journalists in standing up for and giving effect to the right to freedom of expression.

**Issue 4:** The Scottish Government should set out what specific, deliberate and progressive actions it is undertaking to: realise human rights in Scotland for rights holders; require duty bearers to comply with existing law.

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<sup>1</sup> Elucidated by 'General comment No. 34 on Article 19: Freedoms of opinion and expression', 2011 [https://tbinternet.ohchr.org/\\_layouts/15/treatybodyexternal/Download.aspx?symbolno=CCPR%2fC%2fGC%2f34&Lang=en](https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CCPR%2fC%2fGC%2f34&Lang=en)

## Law and Policy on Human Rights and Access to Information Rights

Access to information (ATI) and the right to information (RTI) are clear, enforceable rights established in international human rights law. Empowering people to decide what information they need and when, as well as ensuring that right is freely enforceable requires to be respected, protected and fulfilled. The Scottish Government has invested resources, time and skill in the highly publicised 'Open Government Partnership (OGP)<sup>2</sup>. Whilst CFoIS welcomes such initiatives, it cannot replace RTI.

The Freedom of Information (Scotland) Act 2002 (FoISA) and the Environmental Information (Scotland) Regulations 2004<sup>3</sup> (EISR) provide the main legal framework to deliver Article 19 of the ICCPR on the right and the freedom to seek, receive and impart information and ideas ...<sup>3</sup>. FoISA, which became effective on 1<sup>st</sup> January 2005, places clear duties on bodies specifically designated for coverage and provides for the individual right to be enforced through an internal review process and an external appeal to the Scottish Information Commissioner<sup>4</sup>. FoISA and the EISR have made a huge difference but action is needed to keep the rights modern, accessible, relevant, effective and robust.

In contrast to its enthusiastic work on OGP, the Scottish Government's performance on FoISA delivery is currently subject to enforcement action by the Scottish Information Commissioner. On 2nd February 2018, the Commissioner wrote to the Minister detailing the aims of the intervention which had been necessitated by evidenced failures in compliance.<sup>5</sup> The Scottish Government is setting a very bad example. Although progress continues to be made two years later, the pace is too slow, and effort is spent catching up instead of focusing on developing best practice.

Other legislation requires monitoring of public sector duties on transparency and accountability such as the Auditor General for Scotland who has reported to the Scottish Parliament on matters which cause her concern. For example, her report on Bòrd na Gàidhlig<sup>6</sup>, an executive non-departmental public body to promote Gaelic and improve the status of the language throughout Scotland states:

"There was a lack of openness and transparency in decision-making within the organisation. There was limited evidence of the board providing effective scrutiny and challenge of decision-making or holding senior management to account for their performance. There was also a lack of clarity over the respective roles and responsibilities of the senior management team, committees, the Scottish Government's sponsor team and the board, with board members becoming too involved in operational matters.<sup>7</sup>

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<sup>2</sup> See <https://www.gov.scot/groups/open-government-partnership-steering-group/>

<sup>3</sup> Treaty available at <https://www.ohchr.org/en/professionalinterest/pages/ccpr.aspx>

<sup>4</sup> For more information see

<http://www.itspublicknowledge.info/home/ScottishInformationCommissioner.aspx>

<sup>5</sup> For the detail and timeline go to the Scottish Information Commissioner website at <http://www.itspublicknowledge.info/home/AboutSIC/WhatWeDo/Intervention201702016ScottishGovernment.aspx>

<sup>6</sup> For more information see <https://www.gaidhlig.scot/>

<sup>7</sup> Report contained in papers to the Public Audit and Post Legislative Scrutiny Committee of the Scottish Parliament, 16<sup>th</sup> January 2020 at

CFoIS recognises that FoISA is a distinctive process that cannot be replaced or compensated for by other initiatives. FoISA needs to be protected as it places the power with rights holders in securing transparency and accountability. From CFoIS's work, we submit that that law, culture and practice need to change in Scotland so that our rights keep pace with how information is gathered and processed, and duties extended to other bodies to keep up with how public services are delivered.

## LOIPR

### Delivering Rights?

The legal requirements under ICCPR appear to be met in Scotland but the problem arises over culture, practice, impact and outcomes:

- Under Article 2.1 much more needs to be done to raise awareness to young people about their right to information as the evidence has shown that far fewer are aware than the rest of the adult population<sup>8</sup>; also deliberate and positive action is needed on inclusive communication so that people can exercise their rights effectively for example, using free tools and guidance via the Inclusive Communication Hub.<sup>9</sup>
- Under Article 2.2 the requirement is being met by the Scottish Government to provide laws to give effect to Article 19 under the ICCPR, but its compliance is a matter of such concern that it has been under enforcement action by the Scottish Information Commissioner since 2018.
- Article 2.3 (c) is also being realised as the Scottish Information Commissioner, is enforcing remedies but the increase in enforcement action places strains on current budget and capacity. Those pressures may delay efforts by the Commissioner, so far considered to be essential, to support new bodies designated under Section 5 of FoISA eg to offer training and practice advice.
- Article 3 requires the Scottish Government to ensure the equal right of men and women to the enjoyment of Article 19, but the evidence shows that disproportionately men use the right.<sup>10</sup> However the problem remains that unless FoISA is reformed, people will equally be disadvantaged.

### Pro-active publication of information

CFoIS notes that General Comment 34 states 'To give effect to the right of access to information, States parties should proactively put in the public domain Government information of public interest' (para 19). There does not appear to be any quantitative and qualitative evaluations of the pro-active publication of information by designated bodies in Scotland. Designated authorities do have to adopt a publication scheme approved by the Commissioner, and all have adopted the Scottish Information Commissioner's own Model Publication Scheme, which requires them to publish a

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[https://www.parliament.scot/S5\\_Public\\_Audit/Meeting%20Papers/Meeting\\_papers\\_PUBLIC16January2020.pdf](https://www.parliament.scot/S5_Public_Audit/Meeting%20Papers/Meeting_papers_PUBLIC16January2020.pdf)

<sup>8</sup> For example see evidence from Scottish Youth Parliament to the Scottish Parliament at [https://www.parliament.scot/S5\\_Public\\_Audit/General%20Documents/45\\_Scottish\\_Youth\\_Parliament.pdf](https://www.parliament.scot/S5_Public_Audit/General%20Documents/45_Scottish_Youth_Parliament.pdf)

<sup>9</sup> For more information see <http://inclusivecommunication.scot/>

<sup>10</sup> Evidence to the Scottish Parliament from Dr Ben Worthy on 3rd October 2019 at <http://www.parliament.scot/parliamentarybusiness/report.aspx?r=12306&mode=pdf>

Guide to Information that they make available.<sup>11</sup> For example lots of financial and operational information should be pro-actively published under FoISA but no monitoring seems to be undertaken to verify nor if there is a progressive expansion of the range of information published. There is a need for a regulatory overview of what is happening in practice on pro-active publication of information.

### **Designation of Bodies Delivering Public Functions**

Under Section 5 of FoISA new bodies can be designated but the pace and detail have been very slow. Currently the Scottish Government is considering responses to its latest consultation and we expect a report and a response to what has been said, in the Spring of 2020.

In General Comment 34 'public bodies' are defined (para 7) and it is also stated that 'The designation of such bodies may also include other entities when such entities are carrying out public functions' (para 18). This is the opinion of the public in Scotland too and evidenced by the Scottish Information Commissioner's polling. For example, in response to questions put to them in 2017:

- 94% agreed it is important for the public to be able to access information
- 77% would be more likely to trust an authority that publishes a lot of information about its work
- Strong public agreement on the type of information which should be made available by public authorities: how public authorities spend their money (94%), reasons for the decisions public authorities make (90%), how public authorities deliver their services and functions (94%)
- contracts with other organisations (84%)
- data and statistics about their performance (93%)<sup>12</sup>

Further insights were gained by Scottish Information Commissioner polling in 2019 when respondents generally agreed that it was "extremely" or "very" important for public bodies to publish information about:

- how they spent their money (85%)
- the reasons for the decisions they make (80%)
- information on the contracts they have with other organisations (74%)
- information on how they deliver their functions and services (79%).
- 80% of survey respondents agreed that **private** sector companies who work on contracts for public bodies should be subject to the same FOI laws as public bodies.<sup>13</sup>

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<sup>11</sup> Scottish Information Commissioner  
<http://www.itspublicknowledge.info/ScottishPublicAuthorities/PublicationSchemes/PublicationSchemeHome.aspx>

<sup>12</sup> Available at  
<http://www.itspublicknowledge.info/home/SICReports/OtherReports/PublicAwarenessResearch2017.aspx>

<sup>13</sup> Available at  
<http://www.itspublicknowledge.info/home/SICReports/OtherReports/PublicAwarenessResearch2019.aspx>

UNISON, Scotland's largest trade union with members across the public, private and voluntary sectors, believes that the right to information is 'fundamental to a democracy and that it should apply to all public services, however they are delivered... There should be a universal, statutory, enforceable right to information about all public services, regardless of what type of body delivers the service.' It also points out that 'We have raised concerns in particular, along with many others, about the ways in which the right to information has been undermined by the public losing rights through the changing way services are delivered, including some services being outsourced / transferred to different providers.'<sup>14</sup>

CFoIS believes the Scottish Government should be bold in the number and range of new bodies designated under FoISA and include all those delivering public services and services of a public nature. Such an extension helps to deliver the introductory text of FoISA "An Act of the Scottish Parliament to make provision for the disclosure of information held by Scottish public authorities or by persons providing services for them; and for connected purposes."<sup>15</sup> Currently there are inconsistencies on what is a public authority<sup>16</sup> and who "are providing services for them".

CFoIS has published its response which recommends that the FoI right should follow the spend of public money<sup>17</sup>. This definition covers voluntary and private organisations that are delivering services under contract and through grant funding. In practice this will mean that FoISA will only apply to the portion of their business which is funded by the public purse. The separation of functions has already been clarified under the Human Rights Act 1998 (HRA) in a number of cases.<sup>18</sup> Under the HRA, public authorities and those delivering services of a public nature are required to comply with the European Convention on Human Rights (ECHR). Article 10 of the ECHR is similar in effect to Article 19 of the ICCPR<sup>19</sup>.

It is interesting to note that the Scottish Council for Voluntary Organisations (SCVO) opposes the designation of Third Sector organisations that are delivering public services or services of a public nature.<sup>20</sup>

### **Role and Experiences of the Press and Media**

Due to letters of complaint from 40 journalists<sup>21</sup> and informed submissions such as from CFoIS, the Scottish Parliament passed a unanimous motion on 21<sup>st</sup> June 2017 to hold two inquiries into FoISA: into the Scottish Government's compliance with freedom of information requests; for post legislative scrutiny of the Freedom of Information (Scotland) Act 2002. The latter is underway.

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<sup>14</sup> Evidence at

[https://www.parliament.scot/S5\\_Public\\_Audit/General%20Documents/53\\_UNISON\\_Scotland.pdf](https://www.parliament.scot/S5_Public_Audit/General%20Documents/53_UNISON_Scotland.pdf)

<sup>15</sup> FoISA at <https://www.legislation.gov.uk/asp/2002/13/introduction>

<sup>16</sup> For example analysis of the decision of the ONS to consider RSLs as private non-financial bodies <https://www.tcyoung.co.uk/blog/2018/social-housing/ons-reclassification-rsls-private-bodies>

<sup>17</sup> Available at [https://www.cfois.scot/?page\\_id=60](https://www.cfois.scot/?page_id=60)

<sup>18</sup> Cases involving RSLs at <https://www.housingrights.org.uk/news/legal/peabody-public-body>

<sup>19</sup> For example, the Grand Chamber decision in the case of on MAGYAR HELSINKI BIZOTTSÁG v. HUNGARY (Application no. 18030/11)

<sup>20</sup> Third Sector News, 6<sup>th</sup> January 2019 at <https://www.thirdsector.co.uk/scvo-warns-against-extension-scottish-freedom-information-act/policy-and-politics/article/1669968>

<sup>21</sup> See open letter at <https://www.commonspace.scot/articles/14311/40-journalists-sign-open-letter-calling-scottish-government-foi-legislation-refresh>

The Scottish Information Commissioner has confirmed, as one of his enforcement actions that freedom of information requests from journalists are being treated differently because of their name and profession and that Scottish Government compliance with the law needs to improve significantly.<sup>22</sup> Progress is being made but the enforcement action continues in other areas.

The post legislative scrutiny of FoISA has exposed negative attitudes from some public authorities currently designated under FoISA, towards the press and media and has led to recommendations to curtail their activities. There appears to be a poor understanding that a free press and media goes hand in hand with inquisitive journalism and are key elements of human rights law. For example, Police Scotland states: 'This consultation may be an opportunity to charge for FOISA requests which may be supported by OSIC if the issue of the 'spirit' was challenged i.e. the Act was created for individuals and not media houses. This is an area that is being explored by Police Forces south of the Border',<sup>23</sup> and specifically cites the example of Leicestershire Police.<sup>24</sup>

### **Impact of austerity and cuts in budgets and staff**

As part of the post legislative scrutiny of FoISA, journalists have continued to highlight problems with the practice of rights including by other public authorities:

- 'The NUJ is concerned, given ongoing cuts in the funding of public services, that the provision of handling FOISA requests is seen as less of a priority, and that either fewer resources will be allocated, or that there will be increased calls for a standard charge for FOISA requests'. In terms of improving FoISA: 'The NUJ remains concerned that as council and government services are outsourced and privatised these companies are exempt from FOISA requests, despite being responsible for the fulfilling of public services. There is a serious risk that the aim of improving accountability will be severely undermined if the provision is not extended.'<sup>25</sup>
- Journalists have also submitted separate evidence giving specific examples of where FoISA is not being followed including: 'unexplained and significant delays across the public sector in the release of information in breach of statutory deadlines; huge variations in the quality and pace of information request handling across the public sector, with some bodies routinely mishandling requests; public bodies repeatedly failing to properly apply the section 30 public interest test, making narrow interpretations of the scope or

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<sup>22</sup> The 'Intervention Report – Assessment Stage' Published by the Commissioner is available at <http://www.itspublicknowledge.info/home/AboutSIC/WhatWeDo/Intervention201702016ScottishGovernment.aspx>

<sup>23</sup> Page 1 of Submission at [https://www.parliament.scot/S5\\_Public\\_Audit/General%20Documents/16\\_Police\\_Scotland.pdf](https://www.parliament.scot/S5_Public_Audit/General%20Documents/16_Police_Scotland.pdf)

<sup>24</sup> Police Professional website, article dated 27<sup>th</sup> March 2019 <https://www.policeprofessional.com/news/leicestershire-police-want-to-charge-journalists-for-foi-requests/>

<sup>25</sup> NUJ submission at [https://www.parliament.scot/S5\\_Public\\_Audit/General%20Documents/32\\_National\\_Union\\_of\\_Journalists.pdf](https://www.parliament.scot/S5_Public_Audit/General%20Documents/32_National_Union_of_Journalists.pdf)

requests, or failing to properly justify their decisions by referring to the act's provisions.<sup>26</sup>

Corroboration on the impact of cuts is also provided by UNISON Scotland which acknowledges there has been an increase in authorities failing to meet the statutory 20 working day time limit and points out that: 'In our view, a major factor in late responses, is the austerity cuts imposed on public bodies by Westminster and Holyrood governments. Understaffing in FOI teams, and severe staffing pressures in other areas, where FOI officers need to find the information requested, can make responding within the FOI legal deadlines difficult. That is not the fault of the staff concerned, but public bodies must make available sufficient resources to comply with the legislation.' UNISON provides further evidence in a second submission drawing on early data from a survey of UNISON members working in FOI, and on responses to FOI requests to a number of public bodies about how they deliver on FOI.<sup>27</sup>

### **Wider Human Rights Delivery**

The 'Concluding Observations' on the UK's compliance with the ICCPR, published in July 2015, welcomed the 'adoption of Scotland's National Action Plan for Human Rights (SNAP) 2013-2017'<sup>28</sup> but:

- Was concerned about the lack of a comprehensive mechanism for reviewing existing gaps and inconsistencies between the domestic human rights legal framework and the rights as set forth in the Covenant' (para 5)
- Recommended the UK should 'engage in consultation with stakeholders at all levels to identify ways to give greater effect to the Covenant' (para 5)
- Recommended the UK should 'introduce new awareness-raising campaigns aimed at promoting respect for human rights and tolerance for diversity' (para 10)
- Recommended the UK should 'disseminate widely the Covenant, the text of its seventh periodic report and the present concluding observations, among the judicial, legislative and administrative authorities, civil society and non-governmental organizations operating in the country, and the general public.' (para 26)

It will be interesting to read about the progress in Scotland of these observations and recommendations. Whilst there are a number of reports and high-level commitments on human rights, the pace of implementation and impact is slow and greater transparency on progress would be welcome such as on:

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<sup>26</sup> See evidence from 21<sup>st</sup> June 2019 at [https://www.parliament.scot/S5\\_Public\\_Audit/General%20Documents/39\\_Journalists\\_and\\_Media\\_Union\\_Representatives.pdf](https://www.parliament.scot/S5_Public_Audit/General%20Documents/39_Journalists_and_Media_Union_Representatives.pdf) and evidence dated 22nd October 2019 at [https://www.parliament.scot/S5\\_Public\\_Audit/General%20Documents/Supplementary\\_evidence\\_from\\_Journalists\\_22\\_October\\_2019.pdf](https://www.parliament.scot/S5_Public_Audit/General%20Documents/Supplementary_evidence_from_Journalists_22_October_2019.pdf)

<sup>27</sup> Dated 12<sup>th</sup> December and available at [https://www.parliament.scot/S5\\_Public\\_Audit/General%20Documents/UNISON\\_FOI\\_Post\\_Leg\\_Scrutiny\\_evidence\\_12Dec19.pdf](https://www.parliament.scot/S5_Public_Audit/General%20Documents/UNISON_FOI_Post_Leg_Scrutiny_evidence_12Dec19.pdf)

<sup>28</sup> Concluding observations on the seventh periodic report of the United Kingdom of Great Britain and Northern Ireland pub 17<sup>th</sup> August 2015, Para 3 [http://tbinternet.ohchr.org/\\_layouts/treatybodyexternal/SessionDetails1.aspx?SessionID=899&Lang=en](http://tbinternet.ohchr.org/_layouts/treatybodyexternal/SessionDetails1.aspx?SessionID=899&Lang=en)

1. The First Ministers' Taskforce on Human Rights' following the report of the 'First Minister's Advisory Group on Human Rights Leadership', December 2018, which made seven recommendations.<sup>29</sup>
2. The Equalities and Human Rights Committee report 'Getting Rights Right: Human Rights and the Scottish Parliament', of November 2018, made 40 recommendations to be delivered over the next ten years by a range of duty bearers including: to 'Investigate the capacity and resourcing of civic society equalities and human rights advocacy'; and, targeted public authorities, to act on 'Resource of civic society to improve engagement with the United Nations'.<sup>30</sup>
3. There is a lack of transparency over the next phase of Scotland's National Action Plan on Human Rights (SNAP), the first four-year plan having ended in 2017 and a fresh plan promised for 2019.<sup>31</sup> We await developments.
4. The report of the Equalities and Human Rights Committee of the Scottish Parliament on the funding and delivery of human rights by NGOs in Scotland and the work of Human Rights Defenders.<sup>32</sup> The importance of the work of 'Defenders' was also acknowledged in a debate at the Scottish Parliament on 10<sup>th</sup> December 2019<sup>33</sup>.

## Conclusion

Given the evidence provided above, CFoIS invites the HRCtte to consider requiring the Scottish Government to address ATI and RTI issues in Scotland. CFoIS would welcome your input to influence the nature of reforms and encourage speedy delivery. CFoIS is keen to work with the Scottish Parliament and the Scottish Government to improve law and practice and to share our knowledge about practice.

CFoIS wishes to place on record our appreciation of the hard work and dedication of FoI officers across Scotland whom we regard as 'human rights defenders'.

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## About CFoIS

The Campaign for Freedom of Information in Scotland (CFoIS) was established in 1984 to secure a legal right of access to information so that people could find out about how they are governed and how their services are delivered. We have been involved in all the major developments of the legislation at a Scottish level. CFoIS is independent of government and relies on donations and income generated through training. Info at <https://www.cfoi.org.uk/scotland/>

<sup>29</sup> Announcement at <https://www.gov.scot/news/new-national-taskforce-to-lead-on-human-rights-in-scotland/> and website at <https://humanrightsleadership.scot/>

<sup>30</sup> Recommendations 4 and 14 at <https://digitalpublications.parliament.scot/Committees/Report/EHRiC/2018/11/26/Getting-Rights-Right--Human-Rights-and-the-Scottish-Parliament-3>

<sup>31</sup> See Scottish Human Rights Commission website, accessed on 13<sup>th</sup> January 2020, at <http://www.scottishhumanrights.com/scotlands-national-action-plan/>

<sup>32</sup> Report 'Looking ahead to the Scottish Government's Draft Budget 2020-21: Valuing the Third Sector, 4th Report, 2019' Session 5 at <https://sp-bpr-en-prod-cdnet.azureedge.net/published/EHRiC/2019/11/7/Looking-ahead-to-the-Scottish-Government-s-Draft-Budget-2020-21--Valuing-the-Third-Sector/EHRiC-S5-19-04.pdf>

<sup>33</sup> Available at <http://www.parliament.scot/parliamentarybusiness/report.aspx?r=12422&mode=pdf>

## **Scottish Public Information Forum (SPIF)**

CFoIS organises two meetings per year of SPIF to promote the public interest. SPIF is an opportunity for rights holders and duty bearers to meet and discuss RTI and ATI in Scotland and consider how laws are operating. Learning from each other helps improve understanding and practice. SPIF's remit is to 'enable the long-term effectiveness of FoISA and the EIR(S)s. Its role is incorporated in the Scottish Government's Six FoI principles published in 2007:

'Maintains effective relationships with the Scottish Information Commissioner and other key stakeholders - We ensure the effective operation of the Act by fostering and maintaining good working relationships on Freedom of Information with stakeholders such as other public authorities and the Scottish Public Information Forum.'<sup>34</sup>

However, SPIF failed to meet for seven years so in 2017 CFoIS reconvened it to:

- Act as a sounding-board on the practical operation of FoISA and the EIR(S)s.
- Share experiences of FOI and the EIR (S)s
- Share good practice on FoI and EIR(S)s.
- Hear updates from the Scottish Information Commissioner and the UK ICO
- Hear updates from the public sector ie bodies designated for compliance under FoISA or the EIR(S)s
- Encourage civil society to attend and NGOs to attend and share their experiences.

Despite receiving no funding to organise, and SPIF is free to attend, CFoIS has been successful in receiving support from civil society which agrees to host meetings and provide catering which is much appreciated. Dates are already agreed for 2020 proving the popularity of the opportunity within the RTI sector. The details are:

- Unite the union<sup>35</sup> will host SPIF on 23rd March 2020 from 10am -1pm at 22 York Place, Edinburgh EH1 3EP. The meeting will close with a light networking lunch. Registration is free via Eventbrite and more details will appear shortly.
- The Wheatley Group<sup>36</sup> will host SPIF on 24th September 2020 in Glasgow and more details will appear closer to the date.

**ENDs**

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<sup>34</sup> More information at Scottish Government <http://www.gov.scot/About/Information/FOI/6principles>

<sup>35</sup> For more information see <https://unitetheunion.org/what-we-do/unite-in-your-region/scotland/>

<sup>36</sup> For more information see <https://www.wheatley-group.com/>