



# UK OPEN GOVERNMENT CIVIL SOCIETY NETWORK

## Evidence to the Commission on Freedom of Information

Endorsed by over 100 civil society organisations  
November 2015

### Contact

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## Introduction

The Open Government Network (OGN) is a coalition of organisations and individuals committed to making government work better for people through transparency, participation, and accountability.<sup>1</sup> This evidence was prepared by the OGN, and has been endorsed by a diverse group of over 100 civil society organisations, ranging from national NGOs, to local community groups, and open government campaigners, to health, environment and transport charities. A full list of the signatories can be found at the end of this submission.

The OGN was established in 2011 in response to the Government joining the Open Government Partnership (OGP) - an international initiative spanning 69 countries, which was established to 'provide a platform for domestic reformers committed to making their governments more open, accountable, and responsive to citizens'.<sup>2</sup> The Open Government Partnership plays an important global role in setting clear ambitions for governments to 'race to the top' in areas of transparency, civic participation, public integrity and the use of new technologies for openness and accountability.<sup>3</sup>

We regard the Freedom of Information Act as a fundamental pillar of the UK's openness arrangements and consider that any proposals to limit the scope and function of the FOI Act would be incompatible with the Government's wish to be "the most open and transparent government in the world".<sup>4</sup> As a founding, and steering committee, member of the OGP, the UK is looked to for leadership on open government. Any weakening of the FOI Act in the UK would run contrary to the spirit and purpose of the OGP, undermining the leading role of the UK, and would offer reassurance to closed and corrupt governments around the world. Such a move would seriously undermine international efforts to bring about open government.

The OGN includes organisations working to promote open government in a wide range of settings (e.g. local democracy, science policy, international development and the extractives industries), and through a wide range of open government mechanisms (e.g. civic participation, open policymaking and open data). Across the OGN, the Freedom of

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<sup>1</sup> <http://www.opengovernment.org.uk/>

<sup>2</sup> <http://www.opengovpartnership.org/>

<sup>3</sup> <http://www.opengovpartnership.org/about/open-government-declaration>

<sup>4</sup> <http://www.opengovernment.org.uk/resource/uk-action-plan-2013-15/>

Information Act is seen as foundational: providing an important legal backstop to work on proactive transparency and openness, and acting to regulate the balance of rights and responsibilities between citizens and government. The nature of devolution means that any changes to the FOI Act will also impact on the transparency of reserved public sector functions in the devolved nations. Our members and partners across Northern Ireland, Scotland and Wales are therefore concerned about the implications this review could have for their right to information.

We are deeply concerned by arguments that play proactive and reactive transparency approaches off against one another, for example by suggesting that open data renders FOI redundant.<sup>5</sup> The welcome push towards open government data should not be used as a cover to restrict access to information. Both mechanisms are necessary in tandem to ensure the transparency and accountability of government. Indeed, FOI can be critical to establishing the provenance and credibility of open data, since it lets us understand the scope and processes that created the data set - and that nothing has been massaged or excluded.

The decision of what information is in the public interest to disclose should not be left to government alone. Transparency is sometimes uncomfortable for governments, but in many ways that is precisely the point; only through ensuring citizens, civil society, media and the private sector are empowered to demand information from government can we ensure that we are being governed effectively and appropriately. Any discomfort felt by decision makers is far outweighed by this public interest.

We are concerned at the remit of the inquiry being undertaken by the Freedom of Information Commission. Its terms of reference and the framing of the Commission's questions indicate that it is solely focused on the case for restricting the FOI Act. The questions direct discussion towards the issues of alleged damage and costs, rather than an open-minded cost-benefit analysis. Indeed, it has been shown that Freedom of Information requests can save Government money, by exposing bad deals for the taxpayer.<sup>6</sup> We are disappointed that the opportunity to examine where the Act is working well and where an extension to the scope would better support the

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<sup>5</sup> <https://www.gov.uk/government/speeches/francis-maude-speech-on-open-data-and-transparency>

<sup>6</sup> <http://www.foi.directory/foi-in-the-media/>

transparency and accountability of key government functions, for example contracted out public services,<sup>7</sup> was not taken.

Only three years ago the Justice Select Committee, in its post legislative scrutiny of the Act, reported that FOI had proved “a significant enhancement of our democracy” and that the Act “was working well”. The committee concluded that: “We do not believe that there has been any general harmful effect at all on the ability to conduct business in the public service, and in our view the additional burdens are outweighed by the benefits.”<sup>8</sup>

We therefore consider there to be no need to revisit questions regarding the alleged damage or the costs of FOI. In fact, we believe the time is right to examine how the scope of the FOI Act could be widened, in order to strengthen the public’s democratic right to access information and achieve more transparent and accountable government.

## Commission questions

**Question 1: What protection should there be for information relating to the internal deliberations of public bodies? For how long after a decision does such information remain sensitive? Should different protections apply to different kinds of information that are currently protected by sections 35 and 36?**

We accept the need for public officials to have a “safe space” in which to develop and discuss policy proposals, but consider the current protection afforded to the internal deliberations of public bodies to be sufficient and, importantly, we do not consider it to be in the interests of the public or good government for policy deliberations to have absolute exemption from FOI.

The call for evidence suggests that the public interest test creates “uncertainty” about what information may be judged suitable for release, leading to less frank recording of views and exchanges. However, we disagree that this uncertainty is grounds for restricting access to information for three reasons:

Firstly, the balance of public interest has very often been judged to favour withholding information. For example, the Information Commissioner’s Office (ICO) upheld the

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<sup>7</sup> <http://www.opengovernment.org.uk/engage/open-government-manifesto/#section-7>

<sup>8</sup> <http://www.publications.parliament.uk/pa/cm201213/cmselect/cmjust/96/9602.htm>

decision to not release documents declassified for the purposes of the Chilcot Inquiry prematurely – on the grounds that FOI should not pre-empt the process or outcome of that inquiry by piecemeal disclosures.<sup>9</sup> The ICO also refused disclosure of the minutes of the Cabinet meeting in 2003 when the opportunity to bid to host the 2012 Olympic Games was discussed, on the basis that there was no significant public interest in who said precisely what, and that the principle of collective cabinet responsibility should be upheld. Sometimes issues are considered to be of significant public interest and the balance tips in favour of disclosure. Such cases have included requests for information held about the Hillsborough disaster, the takeover of Rowntrees, and the minutes of Cabinet meetings immediately prior to the declaration of war with Iraq in 2003. Different factors were at play in each of those cases, but they were not matters of the routine business of government and each had far-reaching significance.<sup>10</sup>

Secondly, there is little hard evidence to suggest that the ability to disclose internal discussions has resulted in a “less frank recording of views”. A study conducted in 2009 by The Constitution Unit at UCL found that although there were significant concerns from Ministers and Officials about the impact of FOI on the way government conducted business, there was no ‘no evidence that FOI was having any adverse impact on the substance of decisions being made by government. Both Ministers and civil servants thought that the same issues would continue to be considered and the same decisions reached’.<sup>11</sup> Similarly, the Justice Committee in 2012 ‘was not able to conclude, with any certainty, that a chilling effect has resulted from the FOI Act’ and also felt the protections for policy were sufficient and was ‘cautious about restricting the rights conferred in the Act in the absence of more substantial evidence’. The committee argued against change but cautioned care.<sup>12</sup>

Thirdly, if there is a blanket ban on access to information on a public authority’s internal deliberations and they are not subject to a public interest test, then critical mistakes, corruption and scandals could be kept secret for decades. There is significant value to

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<sup>9</sup> <https://ico.org.uk/about-the-ico/news-and-events/news-and-blogs/2015/10/working-effectively-lessons-from-10-years-of-the-freedom-of-information-act/>

<sup>10</sup> <https://ico.org.uk/about-the-ico/news-and-events/news-and-blogs/2015/10/working-effectively-lessons-from-10-years-of-the-freedom-of-information-act/>

<sup>11</sup> Waller, Morris, Simpson and Hazell (2009) Understanding the Formulation and Development of Government Policy in the context of FOI. London: UCL [https://www.ucl.ac.uk/constitution-unit/research/consultancy/ICO - FOI and Policy.pdf](https://www.ucl.ac.uk/constitution-unit/research/consultancy/ICO_-_FOI_and_Policy.pdf)

<sup>12</sup> <http://www.publications.parliament.uk/pa/cm201213/cmselect/cmjust/96/9602.htm>

the public and good government in it being possible for information to come to light that reveals, for example, where wrongdoing took place, evidence or advice was overlooked, or problems were not addressed or ignored. The public's interest far outweighs concerns about the "uncertainty" of officials, which presents at least as strong a case for strengthening FOI, as weakening it.

Sections 35 & 36 of the existing FOI Act provide for broad exemptions, covering the formulation and development of government policy, including advice to ministers and communications between ministers. In the interests of good policymaking and government, it is vital that the inputs covered by these exemptions continue to be subject to a public interest test. For example, to ensure that policy is made in a robust and evidence-based way, free from undue influence, it is important for the public to be able to find out such things as the research used in the development of policy, consultation responses and contact with lobbyists. It is our opinion that these should be routinely and proactively disclosed.<sup>13</sup>

**Question 2: What protection should there be for information which relates to the process of collective Cabinet discussion and agreement? Is this information entitled to the same or greater protection than that afforded to other internal deliberative information? For how long should such material be protected?**

We consider the current system to be adequate protection for information relating to the process of collective Cabinet discussion and agreement. As discussed, the Commissioner and Tribunal already give substantial weight to the need to protect ongoing government discussions through the public interest test. Even where disclosures are made, the minutes of Cabinet meetings do not attribute comments to particular members of Cabinet,<sup>14</sup> preserving the principle of collective discussion and agreement.

All the evidence suggests that the Act is functioning as intended. UK governments since 2005 have only used their veto seven times and only four times in relation to Cabinet discussions: twice vetoing the release of Cabinet minutes on the Iraq War and twice vetoing minutes of the Cabinet subcommittee on Devolution to Scotland, Wales and the Regions dating from 1997. The fact that instances of the use of the veto are so few

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<sup>13</sup> <http://www.opengovmanifesto.org.uk/>

<sup>14</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/61207/Guide\\_20to\\_20Minute\\_20Taking.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/61207/Guide_20to_20Minute_20Taking.pdf)

makes it difficult to argue that the privacy and protection of collective Cabinet discussions are under threat - especially when compared with the 48 instances the Australian government exercised its veto in the first five years of its own FOI Act.

A 2010 study found there to be very few requests for Cabinet documents and that leaks are a far more important cause of Cabinet discussion disclosure.<sup>15</sup> The same study found a few examples of a “chilling effect” but no systematic behaviour changes around advice or space. Indeed they found that many officials were more concerned about the dangers of not having a record if the courts demanded it.

**Question 3: What protection should there be for information which involves candid assessment of risks? For how long does such information remain sensitive?**

A blanket exemption for risk assessments is unlikely to increase candour in such documents. Risk assessments, like impact assessments, should include the risks of all potential avenues of action, including no action at all. As such, the risk assessment should be balanced. Specific consideration should be given to which areas of the risk assessment template should routinely be published, and which should have a higher bar to publication. The public acknowledgement of the existence of certain risks will enhance the public debate about major projects and their implementation. It is when risks can be silently ignored that the consequences are dramatic, often then requiring the complete publication of a flawed risk register when it is too late to prevent the overlooked problems.

**Question 4: Should the executive have a veto (subject to judicial review) over the release of information? If so, how should this operate and what safeguards are required? If not, what implications does this have for the rest of the Act, and how could government protect sensitive information from disclosure instead?**

We are content for the ministerial veto to be applied narrowly and rarely, as originally intended by Parliament, though we see no particular need for it. As reasserted by the Supreme Court, Parliament only ever intended the veto to be used in response to the decisions of the Information Commissioner. In the passing of the FOI Act, the possibility of the veto being used against the tribunal or courts was never debated nor mentioned.

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<sup>15</sup> Hazell, Robert, Worthy, Ben and Glover, Mark (2010) *Does FOI Work? The Impact of the Freedom of Information Act 2000 on British Central Government*. London: Palgrave Macmillan

As ruled by the Supreme Court, it is not reasonable for a government minister to be able to override a judicial decision.<sup>16</sup> Quite apart from the constitutional implication if this were changed, the executive is clearly not an impartial arbiter of whether it is in the public interest for a piece of information to be disclosed. It is therefore right that a suitable third party (i.e. the tribunal or courts) applies a public interest test to disclosure.

Rather than relying on a veto, Ministers should be prepared to make well reasoned and evidenced cases for non-disclosure, which stand up to scrutiny in court. If the executive is unable to do this, it is right that the information in question be disclosed.

**Question 5: What is the appropriate enforcement and appeal system for freedom of information requests?**

The Government has just published proposals to introduce new Tribunal fees, including those for appeals to the First-tier Tribunal against the Information Commissioner's FOI decisions. We believe that this is an inappropriate appeal system for FOI requests. Unlike other tribunal proceedings, which typically involve the appellant's private rights, FOI appeals generally seek to promote the public interest by making information publicly available. The introduction of fees for appeals to the Employment Tribunal has severely cut the number of unfair dismissal claims. It seems highly likely that introducing fees for FOI appeals will have a similarly drastic impact, affecting the provision of information to the public as a whole.

**Question 6: Is the burden imposed on public authorities under the Act justified by the public interest in the public's right to know? Or are controls needed to reduce the burden of FOI on public authorities? If controls are justified, should these be targeted at the kinds of requests which impose a disproportionate burden on public authorities? Which kinds of requests do impose a disproportionate burden?**

We believe that the quantifiable and unquantifiable benefits of the FOI Act justify the cost of FOI to public authorities. In the words of the Justice Select Committee, "the additional burdens are outweighed by the benefits" and FOI has indeed proved "a significant enhancement of our democracy".<sup>17</sup>

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<sup>16</sup> [https://www.supremecourt.uk/decided-cases/docs/UKSC\\_2014\\_0137\\_Judgment.pdf](https://www.supremecourt.uk/decided-cases/docs/UKSC_2014_0137_Judgment.pdf)

<sup>17</sup> <http://www.publications.parliament.uk/pa/cm201213/cmselect/cmjust/96/9602.htm>

Measuring the cost to public authorities of responding to FOI requests is difficult, not least because each request will vary in cost depending on a range of factors, including how easily accessible the information is, and time spent on consultation with ministers and senior officials. Estimates for an individual request range from £19 - £350.<sup>18</sup>

A statutory price cap, set at £600 for government departments, and £450 for other public bodies, already limits the financial cost of FOI to public authorities. Price caps are crude measures of cost however, not taking into account the public interest of disclosure. They therefore risk being used as an excuse for non-disclosure by public authorities of information of high value to the public, particularly if extended to intangible costs (e.g. "thinking time").

It should also be acknowledged that public authorities, through poor recording keeping, undue secrecy and poor implementation of the Act, significantly increase the cost of FOI to themselves and requestors. Increasing proactive transparency, improving government systems and processes, and tackling the culture of secrecy that pervades many public authorities would therefore be a better focus of attention.

The cost of FOI is put into perspective when considered alongside other government expenditure. For example, recently it was revealed that the cost of FOI to central government is less than 2% of the cost of its external communications activities.<sup>19</sup> There is undoubtedly a significant public interest in FOI filling the gaps of, and providing a counterweight to, government communications. That it does this at 1/50 of the cost is remarkable.

Any consideration of the cost of the FOI Act must also take into account its vast benefits. These range from the incalculable benefits of an informed and engaged citizenry, through cases of corruption and malpractice being uncovered, to tangible cost savings to the public purse.

Numerous case studies demonstrate that FOI has been pivotal in exposing information it was in the public's interest to know.<sup>20</sup> Only in the last year, among a host of other things, FOI has revealed:

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<sup>18</sup> <http://www.democraticaudit.com/?p=14767>

<sup>19</sup> <http://www.foiman.com/archives/2072>

<sup>20</sup> <http://www.foi.directory/foi-in-the-media/>

- GP practices are being offered financial incentives not to refer patients to hospitals, with first appointments for cancer included in the target referrals to cut.<sup>21</sup>
- More than a third of people with degenerative health conditions were being judged fit for work by the DWP and having their benefits cut.<sup>22</sup>
- More than 500,000 home care visits last less than five minutes.<sup>23</sup>
- Councils spent £750,000 on booking celebrities for events.<sup>24</sup>
- The extent of British Petroleum's close ties with and influence over the UK government<sup>25</sup>, and the secret group set up by UK Ministers to enable the United Arab Emirates privileged access to investment opportunities.<sup>26</sup>
- GPs have awarded at least £2.4bn of taxpayers' money to organisations that their members own or work for.<sup>27</sup>

We consider any attempt to impose “controls” on FOI, such as charges for submitting FOI requests, to be a significant threat to the openness and transparency of the UK. A charge would act as a heavy deterrent to legitimate FOI requests, rather than a way to fund the cost of responding. This was certainly the case when a €15 application fee was introduced under Ireland’s Freedom of Information Act in 2003. The decline in usage of the Act was immediate and dramatic: between the first quarter of 2003 and the first quarter of 2004 the total number of requests fell by over 50%. In addition, requests for non-personal information had fallen by 75% over the same period while requests for a mixture of

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<sup>21</sup> <http://www.theguardian.com/society/2015/oct/01/gp-practices-offered-rewards-for-not-referring-patients-to-hospitals>

<sup>22</sup> <http://www.independent.co.uk/news/uk/politics/thousands-with-degenerative-conditions-classified-as-fit-to-work-in-future-despite-no-possibility-of-9811910.html>

<sup>23</sup> <http://www.telegraph.co.uk/news/health/news/11302534/Revealed-more-than-500000-home-care-visits-last-less-than-five-minutes.html>

<sup>24</sup> <http://www.dailymail.co.uk/news/article-3088842/Struggling-councils-spent-750-000-taxpayers-cash-booking-C-list-celebrities-events-cut-public-services.html#ixzz3q0D0SF15>

<sup>25</sup> <http://www.theguardian.com/environment/2015/may/20/revealed-bps-close-ties-with-the-uk-government>

<sup>26</sup> <http://www.theguardian.com/politics/2015/nov/09/uk-secret-group-of-top-officials-enable-uae-investment-united-arab-emirates>

<sup>27</sup> <http://www.thetimes.co.uk/tto/health/news/article4610741.ece>

personal and non-personal had fallen by 20%.<sup>28</sup> Ireland's Freedom of Information Commissioner criticised the charge and the fee was eventually dropped, though there remains a cost for appealing against decisions. Charging would likely particularly restrict access to FOI for poorer individuals and communities, further exacerbating inequalities of access to government transparency and accountability.

There are also many legitimate reasons why multiple requests for information may be needed. For example, the UK's health and social care system is highly fragmented and much of the data is not routinely aggregated. Building a national picture of the health and social care system therefore requires a separate request to each authority. Likewise, journalists investigating an issue in depth will not access all the information they need from just one FOI request. For example, the recent analysis of senior executive pay in the public sector by the Daily Mail and Taxpayers' Alliance required over 6,000 FOI submissions and would not be feasible with charging.<sup>29</sup> This research found that nearly 3,500 employees of local councils were paid more than £100,000 in 2013/14, and subsequently led the Chancellor, George Osborne, to write to councils outlining tougher pay guidelines. This opportunity to identify and reduce costs would have been missed with charging present.<sup>30</sup>

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<sup>28</sup> <http://www.oic.gov.ie/en/Publications/Special-Reports/Investigations-Compliance/Review-of-the-Operation-of-FOI2003/Up-front-Fees.html>

<sup>29</sup> <http://www.dailymail.co.uk/news/article-3309596/The-shocking-scale-fat-cat-pay-public-sector-exposed-today-major-Daily-Mail-investigation.html>

<sup>30</sup> <http://www.ft.com/cms/s/0/a945bc68-8e03-11e5-94a4-639039952d45.html#axzz3rwFT8Z3j>

# Signatories

1	Adam Roberts	Chief Executive	Born Free Foundation
2	Alan Hudson	Executive Director	Global Integrity
3	Alexandra Runswick	Director	Unlock Democracy
4	Alexandra Wigzell	Deputy Chair	Standing Committee for Youth Justice
5	Alison Garnham	Chief Executive	Child Poverty Action Group
6	Andrew Mackenzie	Coordinator	Open Data Institute Birmingham
7	Andrew Taylor	Climate Campaigns & Communications Manager	People & Planet
8	Andy Williamson	Director	Democratise
9	Anna Roberts	Executive Director	Burma Campaign UK
10	Anne Thurston	Director	International Records Management Trust
11	Anthony Zacharzewski	Director	Democratic Society
12	Carol McKenna	Director of Campaigns	Compassion in World Farming
13	Catarina Tully	Director	FromOverHere
14	Cathy James	Chief Executive	Public Concern at Work
15	Charles Oppenheim	Professor of Information Management	
16	Charlie Harvey	IT Director	New Internationalist
17	Charlotte Ravenscroft	Head of Policy and Public Services	National Council for Voluntary Organisations (NCVO)
18	Chris Taggart	CEO	OpenCorporates
19	Chris Whitwell	Director	Friends, Families and Travellers
20	Colm Burns	Chair	Northern Ireland Open Government Network

21	Dan Wilson Craw	Policy & Communications Manager	Generation Rent
22	Danny Sriskandarajah	CEO	Civicus
23	David Hills	Head of IT	UWC Atlantic College
24	David Miller	Founder	Spinwatch
25	Deborah King	Cofounder	Disability Politics UK
26	Derek Manson-Smith	Former Co-convener	Campaign for Freedom of Information Scotland
27	Diana Neslen	Chair	Redbridge Equalities and Community Council
28	Duncan Exley	Director	The Equality Trust
29	Ed Hammond	Head of Programmes	Centre for Public Scrutiny
30	Edafe Onerhime	Consultant	ACT Collective Ltd
31	Eithne Rynne	CEO	London Voluntary Service Council
32	Faryal Velmi	Director	Transport for All
33	Fionn Travers-Smith	Campaign Manager	Move Your Money UK
34	Gail Bradbrook	Director	Compassionate Revolution
35	Gavin MacFadyen	Director	Centre for Investigative Journalism
36	Gay Moon	EDF Legal Fellow	Equality and Diversity Forum
37	Graham Gordon	Head of Policy	CAFOD
38	Graham Smith	Professor of Politics	Centre for the Study of Democracy
39	Helen Darbshire	Executive Director	Access Info Europe
40	Henrietta Doyle	Policy Officer	Inclusion London
41	Ian Lawry	CEO	sobus
42	James MacColl	Head of Campaigns	Campaign for Better Transport
43	Jamie Griffiths	Campaigner	Debt Resistance UK
44	Jacqui Howard	National Organiser	Compass
45	Jen Persson	Coordinator	DefendDigitalMe

46	Jim Killock	Executive Director	Open Rights Group
47	Joe Taylor		National Community Activists Network
48	Joel Benjamin	Campaigner	The People vs PFI
49	John Chambers	Chief Executive	Archives and Records Association (UK & Ireland)
50	John Lotherington	Chair	Foundation for Democracy and Sustainable Development
51	Jon Abrams	Promotion and Liaison Officer	Redbridge Concern for Mental Health
52	Jon Alexander	Director	New Citizenship Project
53	Jonathan Gray	Director of Policy and Research	Open Knowledge
54	Joseph Stead	Senior Adviser Economic Justice	Christian Aid
55	Joy Saunders	CEO	Integrity Action
56	Julian Huppert	Former MP	
57	Julian Tait	Co-founder	Open Data Manchester
58	Julie Pal	CEO	CommUNITY Barnet
59	Justin Schlosberg	Chair	Media Reform Coalition
60	Kat Smithson	Policy and Campaigns Manager	National AIDS Trust
61	Kaye Brennan	Lead Campaigner: Policy & Advocacy	The Woodland Trust
62	Laura Cockram	Campaigns Manager	Parkinson's UK
63	Loz Kaye	Co-founder	Open Intelligence
64	Mariam Cook	Founder	PositionDial
65	Marilyn Taylor	Professor of Urban Governance and Regeneration	
66	Mark Braggins	Director/Founder	AHA Digital Ltd/Open Data Aha!

67	Mark Cridge	Chief Executive	MySociety
68	Matthew Downie	Director of Policy and External Affairs	Crisis
69	Mike Childs	Acting Policy and Campaign Director	Friends of the Earth
70	Miles Litvinoff	Coordinator	Publish What You Pay UK
71	Moira Fraser	Director of Policy and Research	Carers Trust
72	Nan Sloane	Director	Centre for Women & Democracy
73	Natalie Sharples	Senior Policy Advisor	Health Poverty Action
74	Nick Beddow	Managing Director	Shared Places
75	Nick Lowles	Executive Director	HOPE not hate
76	Nim Njuguna	Chair	Kenya Diaspora Bureau (UK)
77	Oliver Sidorczyk	Director	Bite The Ballot
78	Paul Bradshaw	Professor in Online Journalism	
79	Pavan Dhaliwal	Director of Public Affairs and Campaigns	British Humanist Association
80	Penelope Gibbs	Director	Transform Justice
81	Phil Booth	Coordinator	MedConfidential
82	Prateek Buch	Member	Open Government Network
83	Rachel Oldroyd	Managing Director	Bureau of Investigative Journalism
84	Remmert Keijzer	Research Coordinator	The Consultation Institute
85	Richard Murphy	Director	Tax Research UK
86	Rita Chadha	CEO	Refugee & Migrant Forum of Essex and London
87	Robert Barrington	Executive Director	Transparency International UK
88	Robin McAlpine	Director	Common Weal
89	Ruchir Shah	Policy Manager	Scottish Council for Voluntary Organisations (SCVO)

90	Rupert Simons	CEO	Publish What You Fund
91	Sarah Johns	Transparency Adviser	Bond
92	Simon Burall	Director	Involve
93	Simon Taylor	Director	Global Witness
94	Stewart Wallis	Executive Director	New Economics Foundation
95	Stuart Lawson	Doctoral Researcher in Open Access	
96	Team		WhatDoTheyKnow
97	Team		Open Data Services Co-operative
98	Thomas Hughes	Executive Director	ARTICLE 19
99	Tim Davies	Co-director	Practical Participation
100	Tim Hughes	Coordinator	UK Open Government Network
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