1. BEMIS is the national Ethnic Minorities led umbrella body supporting the development of the Ethnic Minorities Voluntary Sector in Scotland. BEMIS was established in 2002 to promote the interest of minority ethnic voluntary organisations, develop capacity and support inclusion and integration of ethnic minorities communities. It is a member-led and managed organisation with an elected board of directors.

What is your general view on the purpose of the Bill and broadly, are you supportive of it?

2. BEMIS believes that Freedom of Information is a critical part of the delivery of transparent government and public services in a modern democracy. We fully appreciate that from time to time it will be necessary to review amend and modernize this legislation, taking account of changes in social expectation and the experience derived from the application of the legislation. Broadly speaking BEMIS is supportive of this piece of legislation and its purpose.

The Scottish Government believes the Bill will add strength and clarity to the Freedom of Information (Scotland) Act 2002. Do you agree? Does the Bill protect the rights to access information?

3. BEMIS considers that the proposed legislation will for the most part protect the rights to access information. However BEMIS is disappointed that the Scottish Government seems not to have provided an Equality Impact Assessment in relation to the Bill.

Historical periods

4. In response to the Scottish Government’s consultation on the Bill, concerns were expressed about reducing the time limit period (in certain circumstances) of what constitutes a historical record (Bill section 4). What is your response to the position of the Scottish Government to these concerns?

5. We are broadly supportive of the increased levels of transparency which should result from these changes. BEMIS primary concern in relation to the proposed changes is that there may be scope for accessing personal data not withstanding the exemption periods flexibility contained in the Bill.