



Scottish Information
Commissioner
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Decision Notice 020/2025

First Minister's official diary for September 2021

Authority: Scottish Ministers
Case Ref: 202301066

Summary

The Applicant asked the Authority for the First Minister's official diary for September 2021. The Authority provided some information and withheld the remainder under various exemptions in FOISA. The Commissioner investigated and found that the Authority had been entitled to withhold a small amount of information, but that the rest was wrongly withheld. He required the Authority to disclose the wrongly withheld information.

Relevant statutory provisions

Freedom of Information (Scotland) Act 2002 (FOISA) sections 1(1), (2) and (6) (General entitlement); 2(1)(b) (Effect of exemptions); 29(1)(b) and (d) (Formulation of Scottish Administration policy etc.); 39(1) (Health, safety and the environment); 47(1) and (2) (Application for decision by Commissioner).

Background

1. On 10 October 2021, the Applicant made a request for information to the Authority. The Applicant asked for the First Minister's official diary for September 2021.
2. The Authority responded on 3 November 2021 and applied the exemptions in section 25(1) and 27(1) of FOISA. The Authority explained that details of all Ministerial engagements were proactively published and provided a link to that information. The Authority also stated that it intended to publish some of the information requested no later than 12 weeks after the date of the request.

3. On 15 November 2021, the Applicant wrote to the Authority requesting a review of its decision. The Applicant stated that they were dissatisfied with the decision because they did not request details of Ministerial engagements and instead requested a copy of the First Minister's official diary, which is not readily available to the public.
4. The Authority notified the Applicant of the outcome of its review on 9 February 2022. The Authority revised its original decision, stating that it was applying the exemption in section 39(1) of FOISA to withhold the information requested and that the public interest favoured upholding the exemption.
5. Following an earlier appeal by the Applicant to the Commissioner, the Authority subsequently issued the Applicant with a revised review outcome on 10 August 2023. The Authority disclosed some information to the Applicant and again revised its position regarding the remaining withheld information, to which it applied the exemption in section 29(1)(d) of FOISA and stated that the public interest favoured upholding the exemption.
6. On 21 August 2023, the Applicant again wrote to the Commissioner, applying for a decision in terms of section 47(1) of FOISA. The Applicant stated that they were dissatisfied with the outcome of the Authority's review because they did not consider the Authority had fully considered the public interest test.

Investigation

7. The Commissioner determined that the application complied with section 47(2) of FOISA and that he had the power to carry out an investigation.
8. On 24 August 2023, the Authority was notified in writing that the Applicant had made a valid application.
9. The Authority was also asked to send the Commissioner the information withheld from the Applicant. The Authority provided the information, and the case was subsequently allocated to an investigating officer.
10. Section 49(3)(a) of FOISA requires the Commissioner to give public authorities an opportunity to provide comments on an application. The Authority was invited to comment and to answer specific questions.
11. During the investigation, the Authority again changed its position. The Authority took the following steps:
 - it disclosed a small amount of information previously withheld under 29(1)(d) as it now considered the public interest favoured disclosure of that information
 - it confirmed that, in addition to its reliance on section 29(1)(d) of FOISA, it was also relying on the following exemptions for some of that information: sections 29(1)(b), 38(1)(b) and 39(1) of FOISA.
12. The Applicant subsequently confirmed that, regarding the information withheld under section 38(1)(b) of FOISA, they were content for the Commissioner's decision to be restricted to the personal information of senior Authority officials. Having reviewed the withheld information, the Commissioner is satisfied that it does not relate to senior Authority officials. He will therefore not consider the application of the exemption in section 38(1)(b) of FOISA further in his decision.

Commissioner's analysis and findings

13. The Commissioner has considered all of the submissions made to him by the Applicant and the Authority.

Information disclosed during the investigation

14. As rehearsed earlier, the Authority originally withheld some information from the Applicant in its revised review response of 10 August 2023, under the exemption in section 29(1)(d) of FOISA. However, it later disclosed this information to the Applicant during the Commissioner's investigation.
15. As the Authority disclosed further information to the Applicant during the investigation that it accepted it had not been entitled to withhold, the Commissioner must find that the Authority failed to comply with section 1(1) of FOISA in this respect.

Section 29(1)(d) – Ministerial private office

16. Information is exempt under section 29(1)(d) of FOISA if it relates to the operation of any Ministerial private office (i.e. any part of the Scottish Administration which provides personal administrative support to a Minister).
17. It is a class-based exemption, which means disclosure does not have to result in any kind of prejudice to engage the exemption, only that the request falls within the class of information which the exemption is designed to protect.
18. The Commissioner is satisfied that the withheld information relates to the operation of the First Minister's private office and therefore clearly falls within the terms of the section 29(1)(d) exemption in FOISA.
19. Section 29(1)(d) of FOISA is a qualified exemption, however, and the Commissioner therefore must go on to consider whether the public interest in disclosing the information is outweighed by the public interest in maintaining the exemption.

The public interest test

The Authority's submissions on the public interest

20. The Authority explained that the First Minister's diary is a planning space and contains a series of options for managing their time in the most effective and efficient way.
21. The Authority noted that a factual record of engagements is retained within the diary, but this does not capture all of the discussions and interactions that may have taken place in any given day between Ministers, officials and special advisers.
22. The Authority submitted that if Ministers were required to publish a daily diary (including the timings of all entries) it would diminish their privacy to discuss and develop policy, make decisions and to have open dialogue with policy areas, because there would be pressures on staff and Ministers to present a "version of the day" for publication.
23. The Authority also stated that releasing Ministerial diaries, either in real-time or in response to information requests, would change the way in which Ministerial private offices "narrated" the day and would inevitably lead to the "justification" of space within the diary.
24. The Authority explained that this would risk a reduction in good quality decision-making and discussions through freedom to interact with officials and advisers and would risk inaccurate assumptions being made about Ministerial workloads (e.g. a lot of internal work, like

reviewing policy evidence and Ministerial boxes is not shown in diaries), which would be detrimental to the work of the Authority and would not be in the public interest.

25. The Authority also noted that disclosing Ministerial diaries would impose an administrative burden on all Ministerial private offices to publish explanations, to place that information in context and to correct actual or potential misunderstandings about Ministerial workloads and their use of time, which would be a distraction from the more important work of those private offices.
26. In summary, the Authority considered the public interest favoured withholding the information requested in this case, given the detrimental impact of “potentially misleading” disclosures on the public, the reduced ability of private offices to offer an efficient and effective service to Ministers and the distraction of private offices from “more important work” that it forecast would result from disclosure of daily diaries.

The Applicant's submissions on the public interest

27. The Applicant noted that the Commissioner had only issued one decision on the application of section 29(1)(d) of FOISA, where he found that the public interest favoured disclosure of information that was “routine” and “not at all sensitive”.
28. The Applicant submitted that the same test should apply to the withheld information in this case, as the First Minister’s diary does not, and would not, reveal anything about how their private office operates and, instead, would only demonstrate what the engagements of the First Minister were.
29. More broadly, the Applicant stated there is a general public interest in transparency around the day-to-day engagements of the First Minister and in a greater understanding of their job and responsibilities.
30. Specifically, the Applicant submitted that the First Minister to whom the diary he requested relates repeatedly had questions raised about “unminuted” meetings with individuals which had garnered significant public attention, with one such meeting only emerging several years after it took place. The Applicant further submitted that the First Minister in question was no longer in post and that this served to strengthen the public interest in disclosure of the withheld information.
31. The Applicant also noted that they had requested the First Minister’s diary for September 2021, which was an exceptionally busy period for the government: it was post-election but also pre-Omicron variant of COVID-19, which meant significant decisions were made toward the end of that year.
32. Due to the exceptional public interest in how the Authority fared during the pandemic, the Applicant explained that they considered this alone provided ample public interest favouring disclosure of the withheld information, notwithstanding their other points.

The Commissioner's view on the public interest

33. The Commissioner is not persuaded by the Authority’s argument that disclosure would impact on the ability of the Ministerial private office to provide an effective service (or be detrimental to work of the Authority more generally) for the following reasons:
 - the diary entries are brief and do not necessarily reveal anything about the purpose of the meeting or what is being discussed

- some of the diary entries relate to matters of public record
 - the diary entries relate to matters (and use terminology) a reasonable person would expect to find on inspection of any Ministerial diary. The Commissioner cannot envisage a circumstance in which significant clarification or narration of this, or similar, information would be required in future
 - the Authority could avoid any confusion caused by disclosure by providing further explanation to place disclosed information in context (e.g. by explaining that Ministerial diaries do not give a complete picture of how a Minister spends their time or the importance of any particular meeting, policy or issue under discussion). The Commissioner does not consider that doing this would be unduly burdensome.
34. The Commissioner also recognises the general public interest in transparency, and he agrees with the Applicant that that this extends to transparency regarding Ministerial meetings, given the wider circumstances at the time of the Applicant's request.
 35. In view of the above, and having carefully considered the submissions from both parties, together with the withheld information, the Commissioner is not persuaded (with one exception) by the public interest arguments provided by the Authority in this case.
 36. Regarding the one exception, the Commissioner considers that the public interest favours upholding the exemption for a single email address (which is not repeated elsewhere in the withheld information). Given the nature of this information, he finds that disclosure would not contribute in any meaningful way to the public interest and that it would be likely to cause disruption to the function of a Ministerial private office. Consequently, he is satisfied that the Authority correctly withheld that information under section 29(1)(d) of FOISA.
 37. For the remaining information, the Commissioner is satisfied that the public interest in disclosing the information outweighs that in maintaining the exemption in section 29(1)(d) of FOISA. He therefore finds that the Authority was not entitled to withhold this information under section 29(1)(d) of FOISA.
 38. The Commissioner therefore requires the Authority to disclose to the Applicant the information that was withheld under the exemption in 29(1)(d) of FOISA solely (other than the single diary entry he has found was correctly withheld under that exemption).
 39. As the Authority relied on other exemptions to withhold some of the information it had withheld under the exemption in 29(1)(d) of FOISA, the Commissioner will go on to consider the application of these exemptions below.

Section 39(1) of FOISA – Health, safety and the environment

40. Section 39(1) of FOISA states that information is exempt information if its disclosure under FOISA would, or would be likely to, endanger the physical or mental health or the safety of an individual. This is a qualified exemption and is subject to the public interest test required by section 2(1)(b) of FOISA.
41. As the Commissioner notes in [his briefing on the exemption](https://www.foi.scot/sites/default/files/2023-07/BriefingSection39HealthSafetyandtheEnvironment_2023.pdf)¹, section 39(1) of FOISA does not contain the usual harm test. Instead of the "substantial prejudice" test found in many other harm-based exemptions in Part 2 of FOISA, this exemption refers to the

¹ https://www.foi.scot/sites/default/files/2023-07/BriefingSection39HealthSafetyandtheEnvironment_2023.pdf

"endangerment" of health or safety. This test is less demanding than the "substantial prejudice" test.

The Authority's submissions

42. The Authority submitted that disclosing information about the First Minister's schedule or regular routines could allow individuals with hostile intent to determine patterns of travel, which could pose a serious threat to current and former First Ministers.
43. On this basis, the Authority explained it had withheld some information within the First Minister's diary under section 39(1) of FOISA (among other exemptions) which related to the location of the First Minister's engagements, where this was not otherwise known.
44. The Authority noted that it had received clear advice on this point, including from Police Scotland, to the effect that any disclosure of diary commitments will, over time, show patterns that could expose the First Minister to a greater risk of harm.
45. The Authority submitted that the risk of this harm outweighed the public interest in a single event or schedule and noted that, while all external Ministerial engagements are published, it does not publish the travel arrangements of the First Minister.
46. The Authority further submitted that disclosing information and other details about the specific locations of in-person and virtual meetings would allow individuals who wish to compile datasets on the First Minister's schedule and travel patterns to build a picture through triangulation of data. The Authority stated that it was seeking to anticipate and mitigate risk in relation to patterns which this data may reveal.
47. The Authority explained that it had considered the Commissioner's guidance on section 39(1) of FOISA and considered that there was sufficient risk of harm that could be caused in providing this detail to the public at large. The Authority noted that it had discussed the issue with Police Scotland, who had provided advice that supported the Authority's position.
48. The Authority explained that it considered there had been a significant shift in the political sphere, with Ministers attracting considerably more attention which made it more likely that they would encounter issues and threats with regard to their political positions from those who held extreme views or who felt moved to act against them. The Authority stated that it was therefore imperative that it mitigate risk to individuals: the First Minister, those travelling with the First Minister, and the individuals with whom the First Minister is meeting.

The Applicant's submissions

49. The Applicant noted that section 39(1) of FOISA states that release of the information must be considered to either endanger (or be likely to endanger) the physical or mental health or safety of an individual.
50. The Applicant referred to the Commissioner's guidance on section 39(1) of FOISA, which states that there must be a genuine link between disclosure and the endangerment: it cannot simply be a remote or hypothetical possibility.
51. The Applicant submitted that this was a bar the Authority had not come close to evidencing and that the Authority changing position several times was an admission that there was no clear reason why the information could not be disclosed.

The Commissioner's view

52. The phrase "endanger" is broad enough to apply where there is a threat, direct or indirect, to the safety of a person. Since the exemption does not specify that any threat should be imminent before it applies, the threat may be either immediate, or one which would foreseeably arise in the future. The Commissioner believes that for endangerment to be considered likely, however, there must be some well-founded apprehension of danger, such that the prospect of harm could be regarded as a distinct possibility.
53. The Commissioner recognises that the Authority has raised serious concerns in relation to the safety of the First Minister in the current climate. He has carefully considered these arguments relation to the disclosure of information regarding the location and timing of meetings.
54. Having done so, and having reviewed the withheld information, the Commissioner cannot accept that disclosure of the specific time and location of some of the meetings withheld would allow individuals with hostile intent (or anyone else) to determine patterns which could pose a "serious threat" to current or former First Ministers. He considers this to be the case where:
- a meeting was held virtually or via phone call
 - a meeting location was sufficiently generic so as not to reveal the First Minister's specific whereabouts
 - the event and location (and First Minister's attendance) might reasonably be considered as being in the public domain as at the date of the review outcome
 - the event might reasonably be considered a "one-off".
55. For this reason, the Commissioner finds that disclosure of some of the withheld information in question would not be likely to endanger the physical or mental health or the safety of any person. He therefore finds that the exemption in section 39(1) of FOISA has been wrongly applied by the Authority to that information. Given that the exemption in section 39(1) of FOISA was wrongly applied, the Commissioner is not required to consider the public interest test in section 2(1)(b) in terms of section 39(1) in relation to that information.
56. However, for the remaining information withheld under section 39(1) of FOISA, the Commissioner considers that disclosure of this information would be likely to endanger the health and safety of an individual.
57. The Commissioner accepts that disclosure of this information would, given its greater specificity, plausibly, if joined with other copies of the First Minister's diaries disclosed under FOISA over time (a point the Commissioner considers it relevant to take into account in this particular case), enable patterns (such as they existed) to be identified, leading to the increased risk claimed by the Authority. Consequently, the Commissioner is satisfied that the Authority correctly withheld the information under section 39(1) of FOISA.
58. As the Commissioner is satisfied that some information is exempt from disclosure under section 39(1) of FOISA, he is required to go on to consider the application of the public interest test in relation to that information.

The public interest test

The Applicant's submissions on the public interest test

59. The Applicant's submissions on the public interest are largely set out at paragraphs 29-32. The Commissioner will not reproduce those submissions here, but he will fully consider them in what follows.
60. The Applicant further submitted that the Authority's repeated revision of its position in response to their information request demonstrated a prevailing desire to maintain the privacy of information – a position the Applicant considered unreasonable given their view that the information withheld was "uncontroversial". In view of this, and taking into all the circumstances of their request, the Applicant contended that the public interest favoured disclosure of the information withheld.

The Authority's submissions on the public interest test

61. The Authority accepted that there was a public interest in understanding why specific venues had been chosen for Ministerial engagements.
62. However, the Authority argued that there was a greater public interest in securing the safety of the First Minister, and mitigating potential risk to the First Minister and others associated with the meetings in question.
63. The Authority further contended that providing locations of meetings was unnecessary in order to gain an understanding of the First Minister's activities.
64. On balance, the Authority submitted the public interest in withholding the information, in order to safeguard the health and safety of the First Minister, their team and other third parties involved in those meetings, outweighed the public interest in release of the location details requested.

The Commissioner's view on the public interest test

65. The Commissioner has found that disclosure of the information would, or would be likely to, lead to the endangerment of individuals claimed by the Authority. This means the public interest arguments in favour of disclosure must be strong, to outweigh the public interest in ensuring that individuals are not endangered as a result of such disclosure.
66. Having considered the withheld information in question, the Commissioner does not consider that disclosure of that information would contribute in any meaningful way to the public interest.
67. In all of the circumstances of the case, therefore, Commissioner finds that the public interest arguments put forward by the Applicant are not strong enough to outweigh the public interest in maintaining the exemption. Consequently, he is satisfied that the Authority correctly withheld that information under section 39(1) of FOISA.
68. Where the Commissioner has found that the Authority was incorrect to withhold information to which it applied the exemptions in sections 39(1) and 29(1)(d) of FOISA (solely), he requires the Authority to disclose that information to the Applicant.
69. Where the Authority additionally relied on the exemption in section 29(1)(b) of FOISA to withhold information, the Commissioner will go on to consider the application of that exemption.

29(1)(b) of FOISA - Ministerial communications

70. Under section 29(1)(b) of FOISA, information is exempt information if it relates to Ministerial communications. These are defined in section 29(4) of FOISA as communications between Ministers, including, in particular, communications relating to proceedings of the Scottish Cabinet or any committee of that Cabinet. “Minister” means a member of the Scottish Executive or a junior Scottish Minister (section 29(5) of FOISA).
71. The exemption covers information “relating to” Ministerial communications, so it covers more than just direct communications between Ministers. It can also cover information like:
- records of discussions between Ministers
 - drafts of letters, whether or not the letters were finalised or sent.
72. For the exemption to apply, communication must be between two or more Ministers. However, communications between private secretaries when corresponding on their respective Minister’s behalf are covered by the exemption.
73. Having reviewed the information withheld under the exemption in section 29(1)(b) of FOISA, the Commissioner is satisfied that it relates to Ministerial communications and therefore clearly falls within the terms of that exemption.
74. Section 29(1)(b) of FOISA is a qualified exemption, however, and the Commissioner therefore must go on to consider whether the public interest in disclosing the information is outweighed by the public interest in maintaining the exemption.

The Authority’s submissions on the public interest

75. The Authority confirmed that it wished to rely on the public interest submissions it provided for section 29(1)(d) of FOISA in relation to the exemption in section 29(1)(b). The Commissioner will not reproduce these submissions here, but he will fully consider them in what follows.
76. The Authority recognised the public interest in disclosure of the withheld information (which related to a small number of diary entries) to promote open, transparent and accountable government and to inform public debate.
77. However, the Authority argued that there was a greater public interest in allowing Ministers a private thinking space within which issues and policy positions could be explored and refined, until the Authority could reach a decision or adopt a policy that was sound and likely to be effective.
78. While the Authority accepted that the withheld information did not reveal the detailed content of discussions held, it submitted that releasing the topics, frequency and/or time the First Minister had allocated to each discussion would be detrimental to the way in which Ministers engaged with each other, which it considered would not be in the public interest.
79. Specifically, the Authority argued that releasing detail of the First Minister’s meetings would undermine the First Minister’s ability to have private one-to-one discussions with other Ministers. The Authority noted that a number of meetings withheld in this case were private one-to-one meetings and that it remained important that Ministers were able to conduct free and frank discussions with each other to discuss any concerns or issues, some of which

might relate to personal circumstances, in the knowledge that such discussions would not be made public.

80. The Authority explained that the withheld information could be misconstrued if published without context, particularly where that information implied certain Ministers were not as busy as other Ministers or enabled comparisons to be drawn between two First Ministers without taking cognisance of other work Ministers do. It explained that, were information relating to Ministerial diaries disclosed (absent such context) there would be no way recipients could know the status of Ministerial meetings, which it considered might impact how private office staff managed diaries in the future.
81. The Authority contended that the First Minister might also be the subject of criticism if they were perceived not to have met a particular stakeholder often enough, resulting in Ministers scheduling additional meetings with that stakeholder without any particular need, which it submitted would not be a good use of Authority resources and would impact on the efficiency of the Authority.
82. In summary, the Authority argued that any release of Ministerial meetings would impact how Ministers interact, which would in turn reduce their ability to make policy decisions, or other decisions, which would not be in the public's interest.

The Applicant's submissions on the public interest

83. The Applicant referred the Commissioner to their public interest arguments in respect of the exemptions in 29(1)(b) and 39(1) of FOISA. The Commissioner will not repeat these arguments but will fully consider them in what follows.
84. The Applicant further submitted that meetings between Ministers and the First Minister during a time of national crisis (such as a pandemic) meant that, even were the exemption to apply, disclosure of the withheld information was in the public interest given the overriding need for transparency and accountability at that time. The Applicant considered that this was particularly the case where the then First Minister was no longer in post.
85. The Applicant also submitted that it was unlikely that the withheld information was in any way controversial.

The Commissioner's view

86. The Commissioner has carefully considered the submissions from both parties, together with the withheld information. Having done so, he is not, on balance, persuaded by the public interest arguments provided by the Authority in this case.
87. As rehearsed earlier, the Commissioner recognises the general public interest in transparency, and he agrees with the Applicant that that this extends to transparency regarding Ministerial meetings, particularly given the wider circumstances at the time of the Applicant's request.
88. Furthermore, the Commissioner cannot envisage a circumstance where disclosure of the withheld information would reduce, diminish or otherwise negatively impact upon the private thinking space referred to by the Authority.
89. The Commissioner is also not persuaded that disclosure of the withheld information would be substantially detrimental to the way in which Ministers would engage with other Ministers in future, or that it would significantly undermine Ministerial unity.

90. As rehearsed earlier, the meeting subjects are brief and, in some cases, do not reveal anything about the purpose of the meeting or what is being discussed. The Commissioner considers the information to be, largely, anodyne. He also notes that the Authority submitted that the withheld information did not fully reflect the First Minister's workload (or Ministerial workloads more generally) as it did not capture other work carried out by Ministers, including discussions and interactions that might have taken place on any given day between Ministers, officials and special advisers.
91. The Commissioner considers that Ministers are particularly unlikely to be affected by disclosure of the withheld information, given that they will be more familiar with the day-to-day work of the First Minister (and other Ministers more generally) than the public. Certainly, he cannot envisage a circumstance where disclosure of the withheld information would negatively affect in any meaningful way the relationship between Ministers or Ministerial unity more generally.
92. The Commissioner also considers that, as rehearsed earlier, should the Authority have concerns regarding the misinterpretation of information relating to Ministerial meetings, it could provide further explanation to place disclosed information in context (which he does not consider, to the extent that it might be required, would be unduly burdensome).
93. In all the circumstances, and based on the submissions received in this case, the Commissioner is therefore satisfied that the public interest in disclosing the information outweighs that in maintaining the exemption in section 29(1)(b) of FOISA. He therefore finds that the Authority was not entitled to withhold this information under section 29(1)(b) of FOISA.

Handling matters

94. Following its review outcome dated 9 February 2022, the Authority revised its approach (and the exemptions being applied to withhold information) on two occasions.
95. Requesters are entitled to robust and comprehensive responses to information requests. A review outcome must list all of the exemptions an authority is seeking to apply and explain, in detail, why these exemptions are considered relevant. In this case, as the Authority revised the position it set out in its review outcome dated 9 February 2022 on two occasions, it is clear that a robust and comprehensive assessment of the information requested did not happen.
96. The Commissioner would urge the Authority to respond to information requests carefully, clearly identifying any and all exemptions that may be applied to withhold information, in order to maintain the confidence of requesters (and the Commissioner) in its responses.

Decision

The Commissioner finds that the Authority partially complied with Part 1 of the Freedom of Information (Scotland) Act 2002 (FOISA) in responding to the information request made by the Applicant.

The Commissioner finds that by relying on sections 39(1) and 29(1)(d) to withhold certain information from the Applicant, the Authority complied with Part 1 of FOISA.

However, the Commissioner finds that the Authority failed to comply with Part 1 of FOISA by:

- wrongly withholding information under the exemption in section 29(1)(d) (which it disclosed during the investigation)
- wrongly withholding information under the exemptions in sections 29(1)(b), 29(1)(d) and 39(1) of FOISA.

The Commissioner therefore requires the Authority to disclose to the Applicant the information it was not entitled to withhold by **17 March 2025**.

Appeal

Should either the Applicant or the Authority wish to appeal against this decision, they have the right to appeal to the Court of Session on a point of law only. Any such appeal must be made within 42 days after the date of intimation of this decision.

Enforcement

If the Authority fails to comply with this decision, the Commissioner has the right to certify to the Court of Session that the Authority has failed to comply. The Court has the right to inquire into the matter and may deal with the Authority as if it had committed a contempt of court.

Euan McCulloch
Head of Enforcement

29 January 2025