

Freedom of Information Act 2000 (FOIA)

Decision notice

Date: 30 October 2018

Public Authority: The British Tourist Authority
Address: Upper Ground Floor
1 Victoria Street
London
SW1H 0ET

Decision (including any steps ordered)

1. The British Tourist Authority (BTA) trades as either Visit Britain (VB) or Visit England (VE) and is the national tourism authority legally incorporated under the Development of Tourism Act 1969. It is sponsored by the Department for Digital, Culture, Media and Sport (DCMS). Throughout the notice the Commissioner will refer to the public authority as VB.
2. The complainant has requested a variety of information relating to a number of tendering exercises, grants and funding given by VB. Initially VB disclosed some information, withheld other information citing sections 41 and 43 of the FOIA and confirmed for many elements of the request that the information is not held.
3. During the Commissioner's investigation VB continued to rely on section 41 and 43 but also claimed a late reliance on section 12 for those elements of the request for which it had previously given a 'not held' response. There was also a dispute over the interpretation of one element of the request.
4. In relation to sections 12, 41 and 43 of the FOIA, the Commissioner has decided in this case that they are not engaged. In relation to the dispute over the interpretation of one element of the request, the Commissioner has decided that there are two alternative interpretations, the complainant's interpretation should be accepted and this element of the request processed based on this interpretation in order for VB to have discharged its duties fully under the FOIA.

5. The Commissioner requires the public authority to take the following steps to ensure compliance with the legislation.
 - Disclose the information previously withheld under sections 41 and 43 of the FOIA.
 - Reconsider all elements of the request to which it previously issued a 'not held' response and carry out all the necessary searches required to identify the recorded information it holds. VB should then either disclose the information to the complainant or issue a fresh response under the FOIA that does not rely on section 12.
 - In relation to question one of the section headed 'ESP Grant Programme' of the request, consider the complainant's interpretation of this question and either disclose any further recorded information identified as falling within scope or issue a fresh response under the FOIA.
6. The public authority must take these steps within 35 calendar days of the date of this decision notice. Failure to comply may result in the Commissioner making written certification of this fact to the High Court pursuant to section 54 of the Act and may be dealt with as a contempt of court.

Request and response

7. On 20 January 2018, the complainant wrote to VB and requested a variety of information to be disclosed under the FOIA. As the request is lengthy it is not quoted here but contained in an Annex at the back of this notice.
8. VB responded on 19 February 2018. In relation to the questions under the heading 'ESP Committee', VB provided the requested information for questions 1 and 2 and confirmed that it does not hold the information falling within the scope of question 3. For the questions under the heading 'Procurement', VB disclosed the requested information for questions 1 and 8. In relation to question 4, it provided a copy of the tender but advised the complainant that the remainder of the information was exempt from disclosure under section 41 of the FOIA. VB also applied section 41 of the FOIA to question 2. Concerning questions 3, 5, 6, 7, 9, 10 and 11 VB advised the complainant that the information is not held. For those requests made under the heading 'ESP Grant Programme', VB disclosed some information for questions 1 and 2. For question 3 to 7 VB confirmed that the information is not held.

9. The complainant sent various emails to VB between 23 February and 9 March 2018 expressing her dissatisfaction with its response to her request.
10. VB responded on 12 March 2018. It stated that it had addressed the complainant's request for information in full and in accordance with its duties under the FOIA. It made reference to another FOIA request the complainant had made and advised her that it would respond to this separately in due course.

Scope of the case

11. The complainant contacted the Commissioner on 12 March 2018 to complain about the way her request for information had been handled. She stated that VB has not responded in full to this request. She confirmed that she does not agree any information she has requested is exempt from disclosure under the FOIA and advised the Commissioner that VB does hold much of the information it is stating that it doesn't and insufficient searches for it have been carried out.
12. During the Commissioner's investigation VB confirmed that it wished to rely on both section 41 and 43 of the FOIA for the information it has withheld. With regards to the information it stated that it did not hold, VB carried out further searches as instructed by the Commissioner and identified 132 files of information. It stated that it now wished to rely on section 12 of the FOIA, as it considered the task of redacting this information would exceed the appropriate limit.
13. In relation to question one of the section headed 'ESP Grant Programme' in this request, a further response was issued to the complainant on 10 September 2018. However, on receipt of this the complainant raised concerns over how VB had interpreted this element of the request. She stated that she had asked for *all* the funding the companies had received for the timeframe specified in the request, not just for the Events Support Programme (ESP). VB disagreed with the complainant's interpretation of this element of the request and considered that it had provided the requested information.
14. The remainder of this notice will consider:
 - VB's application of sections 41 and 43 of the FOIA to the information withheld under these exemptions.
 - VB's application of section 12 of the FOIA.

- Question one of the section headed 'ESP Grant Programme' in the request, how its scope should be interpreted and whether any further steps are required to ensure compliance with the FOIA.

Reasons for decision

Section 43 – commercial interests

15. Section 43 of the FOIA states that information is exempt from disclosure if its disclosure would or would be likely to prejudice the commercial interests of the public authority or a third party. It is a qualified exemption so it is also subject to the public interest test. So in addition to demonstrating that disclosure would or would be likely to prejudice the commercial interests of the public authority and/or a third party, the public authority must consider the public interest arguments for and against disclosure and demonstrate that the public interest in favour of disclosure is outweighed by the public interest in favour of maintaining the exemption.
16. VB argued that disclosure of the Evaluation Matrix for the tenders in question (question 2 and 4 of the Procurement section of the request) would be likely to prejudice VB's commercial interests and those of the suppliers involved. It stated that it is a niche market and it only received a small number of responses to the tenders. Disclosure would therefore be likely to prejudice the positions of the parties involved. It went on to say that the withheld information contains details which would be likely to damage the supplier's ability to win new business opportunities for its services and to perform them within a commercially competitive market because other contracting authorities and competitors would be aware of the strengths and weaknesses of its delivery model and methodology. It argued that disclosure of scoring information would provide competitors with an insight into their relative strengths and weaknesses and this would give them a commercial advantage, to the detriment of the supplier as this would be likely to prejudice the supplier's position in any future tendering opportunity.
17. VB provided the following statement from its Procurement Manager:

"The information withheld has commercial value and disclosure would be useful in a market that is not mature and has a small number of competitors (i.e. as evidenced by only 3 responses to a UK wide advertised contract opportunity). The marking process itself would reveal information that amounts to an important part of a bidder's business model and would reduce their competitive advantage. In particular, it would allow a competitor to use the information to alter future bids to challenge the successful bidder in any future tenders.

Whilst the tender in question is quite specific, it falls within a very specific business specialism, which is research into Business Events & Events Strategy within Tourism. The pool of potential bidders within this market (as evidenced by a response from only 3 bidders) is very limited and any failure to bid for future contract opportunities on the part of one or more bidders because of the concerns outlined above would have a significant impact on BTA's ability to secure value for money through a publicly advertised procurement process.

BTA would also argue that disclosure would prejudice our own commercial interests as it would deter bidders from tendering in future for fear that their commercially sensitive information would be made public and would damage relations between BTA and the small number of bidders that exist in the marketplace."

18. In relation to the bidders themselves, it stated that it had received the following statement from one of them:

"Yes I can confirm that we do not want our costs shared with a competitor. There are only a few companies that would pitch for a job like this and therefore our rates are sensitive, and if shared it would influence our decision to pitch for future work".

19. Addressing VB's own commercial interests first, the only arguments the Commissioner has received are those outlined in the last paragraph of the statement provided by its Procurement Manager (paragraph 17). The Commissioner has not received any additional arguments from VB to support this position or indeed the application of section 43 of the FOIA.
20. It has stated that disclosure would be likely to deter future bidders from doing business with VB if commercially sensitive information was disclosed into the public domain. It also made the argument that disclosure would damage its relationship with the limited existing suppliers in the marketplace.
21. VB has not to date explained how the disclosure of the withheld information itself would be likely to have these effects. The Commissioner understands that much of the withheld information is VB's analysis of the tenders received against various markers and criteria. It is not the bids themselves – what these contained and how they were presented. The Commissioner notes that the withheld information does contain the price each bidder put forward. However, this is just the end figure; £x. It does not contain any breakdown of how it had priced the tender and how it reached this figure; information which the Commissioner could see to be commercially sensitive.

22. The Commissioner notes that VB has claimed that this is a very niche market; one with only a handful of suppliers. However, the Commissioner is of the opinion that public sector contracts are very lucrative and a valuable source of income for private sector firms. She cannot envisage firms being put off from bidding for future tenders if the contents of the withheld information were disclosed in this case or at least not to the extent claimed.
23. Also all companies entering into public sector contracts should now be aware of the FOIA, its effects and the need for openness, transparency and accountability.
24. Turning now to the bidders themselves, it is noted that VB has received a very brief statement from one of them. It does not elaborate but it says that this particular bidder would be deterred from doing business with VB in the future if its rates were disclosed. The statement refers to rates specifically rather than the withheld information itself. As discussed above, the withheld information contains the overall figure put forward by each bidder but it does not reveal any information on how each bidder put this together. It does not contain any specific rates or costings.
25. VB has argued that disclosure would reveal the bidders' strengths and weaknesses, which could be used by their competitors to their commercial detriment. It states that it is information that could be used for future tendering exercises. The Commissioner acknowledges that the withheld information assesses the bidders' responses to certain elements of the tender and records where they have scored well and where they have not. Whilst this information would be of interest to competitors, the Commissioner fails to see how it could be used by one bidder against another in a future tender. The Commissioner is of the opinion that each tender is different and specific to the needs and requirements of VB at that time. Although they are specific to research into Business Events and Events Strategy within Tourism and VB has said that the pool of potential bidders is small, the Commissioner cannot see how the contents of the withheld information could be used by a competitor to enable them to outbid another. VB has not explained this in sufficient detail. As stated above, the withheld information is not each tender submission (the specific information supplied to VB to try and win the contract, which the Commissioner may accept contains commercially sensitive information) but VB's assessment of it and some concise comments on how well it felt each bidder had addressed certain elements of the tender and accompanying scores.
26. For the above reasons, the Commissioner is unconvinced that section 43 of the FOIA is engaged in this case.

Section 41 – information provided in confidence

27. Section 41(1) states that information is exempt from disclosure if:

(a) it was obtained by the public authority from any other person (including another public authority), and

(b) the disclosure of the information to the public (otherwise than under this Act) by the public authority holding it would constitute a breach of confidence actionable by that or any other person.

28. It is the Commissioner's established view that the exemption does not cover information the public authority has generated itself. The withheld information consists of three Evaluation Matrix created by VB to assess the tenders that were submitted. It is not information it obtained from another person (this would be the tender itself or quoted information from that tender) but information it created itself as it assessed the tenders. The withheld information contains VB's assessment of how well each bidder addressed specific elements of the tender and the score it gave. The Commissioner is satisfied that although each Matrix comments on information submitted by each bidder as part of the bidding process, each Matrix itself does not reveal any third party information.

29. This is with the exception of the price put forward by each bidder. The Commissioner accepts that this is information it obtained from another person i.e. each bidder as the tenders were submitted to it. For this very limited information it can be argued that this element of the exemption is met.

30. For the price put forward by each bidder, the Commissioner will now consider whether disclosure would constitute a breach of confidence. The Commissioner uses the test of confidence set out by Judge Megarry at the High Court of Justice in *Coco v A N Clark (Engineers) Limited [1968] FSR 415* as a framework for assessing whether a disclosure would constitute a breach of confidence. Judge Megarry suggested that three elements were usually required to bring an action for a breach of confidence:

- the information must have the necessary quality of confidence,
- it must have been imparted in circumstances importing an obligation of confidence, and
- there must have been an unauthorised use of the information to the detriment of the confider.

31. Dealing with the first bullet point, information will possess the necessary quality of confidence if it is more than trivial and not otherwise accessible. The Commissioner understands that this information is not otherwise accessible and both VB and the respective bidders do not regard it as trivial in nature. VB has argued that disclosure would be likely to damage its own commercial interests and those of the bidders. It is therefore clearly seen by both to be information of a commercially sensitive nature. For these reasons the Commissioner is satisfied that this bullet point is met.
32. Turning now to the second bullet point, there are two circumstances in which an obligation of confidence may apply:
 - The confider attached explicit conditions to any subsequent use or disclosure of the information, for example in the form of a contractual term or the wording of a letter; or
 - The confider hasn't set any explicit conditions but the restrictions on use are obvious or implicit from the circumstances.
33. The Commissioner is not aware of any explicit conditions attached to the information (she has not received any such information from VB). However, she accepts in this case that there is an implied duty of confidence owed to the bidders. VB has said that the bidders supplied the necessary information on a confidential basis and with the expectation that it would not be shared.
34. Where commercial information is concerned disclosure will only constitute a breach of confidence if it would have a detrimental impact on the confider. It therefore follows that, for commercial information, the public authority will be expected to put forward an explicit case for detriment. Usually the detriment to the confider in such cases will be a detriment to the confider's commercial interests.
35. In paragraphs 24 to 25 above the Commissioner has already explained why she remains unconvinced from the submissions she has received to date that disclosure would be likely to prejudice or cause detriment to the commercial interests of the bidders. The same reasoning applies here. The Commissioner therefore has no alternative but to conclude that VB has failed to put forward an explicit case for detriment and demonstrate that section 41 of the FOIA applies to the price submitted by each bidder.
36. The information previously withheld under sections 41 and 43 of the FOIA should therefore be disclosed.

Section 12 – appropriate limit

37. Section 12 of the FOIA allows a public authority to refuse to deal with a request where it estimates that it would exceed the appropriate limit to comply with it.
38. The estimate must be reasonable in the circumstances of the case. The appropriate limit is currently £600 for central government departments and £450 for all other public authorities. Public authorities can charge a maximum of £25 per hour to undertake work to comply with a request; 18 hours work in accordance with the appropriate limit of £450 set out above, which is the limit applicable to VB. A public authority can take into account the time and cost involved in carrying out the following activities under section 12 of the FOIA:
- (a) determine whether it holds the information;
 - (b) locate the information, or a document which may contain the information;
 - (c) retrieve the information, or a document which may contain the information; and
 - (d) extract the information from a document containing it.
39. Where a public authority claims that section 12 of the FOIA is engaged it should, *where reasonable*, provide advice and assistance to help the requester refine the request so that it can be dealt with under the appropriate limit, in line with section 16 of the FOIA.
40. As previously explained in paragraph 12 above, initially VB said that it does not hold much of the information requested. The complainant challenged this on the basis that VB had failed to carry out sufficient searches and checks of its records. Initially, VB relied upon the fact that it had deleted the complainant's email account after she left VB and therefore it was unable to retrieve the various information and communications she had requested. The complainant rightfully pointed out that VB appeared to have failed to search the email accounts and records of many of the recipients and senders mentioned in this request. The Commissioner therefore requested VB to carry out further searches.
41. VB responded. It advised that it had instructed a senior member of its IT team to conduct a search of emails that have been primarily archived before they are deleted and to retrieve those emails. It stated that the search parameters used included searches of nine of the recipients indicated in the complainant's request. The IT Department also included key words used by the complainant in her request as part of the search.

42. VB argued that the search returned 132 files and took approximately 90 minutes for IT to retrieve. IT stored the emails in a secure area with restricted access to members of the Legal and Compliance team at VB. Subsequently, the Legal and Compliance team conducted a sampling of the emails in order to evaluate them against the requirements of the Data Protection Act and FOIA. VB confirmed that the sample size was 20 email files and it took 12 minutes per email, totalling 4 hours. It stated that it noted the following as a result of its evaluation of this sample:
- The data consisted of information, which if disclosed, could prejudice VB's commercial interests. Subsequently, any information relating to commercial activities would need to be redacted in order to avoid VB releasing commercially sensitive data which is exempt under section 43 of the FOIA.
 - The emails also contained the details of named staff at VB, which would require redaction in accordance with the Data Protection Act.
43. VB confirmed that the only way to disclose such information would require an extensive process of redaction and that task would almost certainly exceed the appropriate limit as defined by the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations, giving VB the right to refuse these elements of the request under section 12 of the FOIA. It stated that it was confident that it would exceed the limit, given the retrieval returned 132 files and the process of going through each individual email and redacting the necessary information relating to third parties and commercial information would be a very vigorous process.
44. The Commissioner's guidance (which can be accessed via the following links) addresses the task of redaction and the task of considering whether any exemptions apply:
- https://ico.org.uk/media/1199/costs_of_compliance_exceeds_appropriate_limit.pdf
45. At paragraphs 14 and 15 of her guidance, the Commissioner states:
- "...a public authority cannot include the staff time taken, or likely to be taken, in considering whether any exemptions apply in the costs estimate as this activity does not fall within the list of permitted activities."
- "Also, the staff time taken, or likely to be taken, in removing any exempt information in order to leave the information that is to be disclosed, often referred to as 'redaction', cannot be included as part of the costs of extracting the requested information."

46. This approach is supported by the Information Tribunal in the case of *The Chief Constable of South Yorkshire Police v the Information Commissioner (EA/2009/0029, 14 December 2009)* and also by the High Court on appeal [2011] EWHC44 (Admin).
47. The Commissioner has already afforded VB ample opportunities to demonstrate that it has dealt with this request (and others the subject of another decision notice referenced FS50785526) in accordance with the FOIA. During the investigation she undertook under case reference FS50785526 she informed VB several times that such tasks cannot be taken into account when considering the application of section 12 of the FOIA. She directed VB to her guidance and suggested several times that VB consider other decisions she has made in relation to section 12, which are available on her website. Despite this, it has still presented submissions to the Commissioner applying section 12 of the FOIA on the basis that it would exceed the appropriate limit to consider section 40 and 43 of the FOIA in relation to these elements of the request and redact the necessary information.
48. For the above reasons, the Commissioner has no alternative but to conclude that section 12 of the FOIA does not apply.
49. The Commissioner also has concerns as a result of a recent telephone call with VB that it may not have carried out all the necessary searches for all elements of the request where it previously advised the complainant that it does not hold the information. She is therefore not fully satisfied at this point that all relevant information has been identified.
50. The Commissioner therefore requires VB to reconsider all elements of the request to which it previously issued a 'not held' response and carry out all the necessary searches required to identify the recorded information it holds. It should then either disclose the information to the complainant or issue a fresh response under the FOIA that does not rely on section 12.

Question one of the section headed 'ESP Grant Programme' in the request

51. As stated in paragraph 13 above, there is some dispute over the scope of this question and what recorded information it potentially covers. The complainant has one interpretation which would cover more information to that disclosed. VB has interpreted the question more restrictively and considers its interpretation of this question is the correct one to adopt.
52. The complainant asked for:

"Print out from CODA showing all the funding that **all** grant applicants for the event support programme to date have received from VisitBritain between 2013 to 2017"

53. During the Commissioner's investigation (on 10 September 2018) VB disclosed a list of ESP grants. The complainant responded immediately and said that this information was not satisfactory as it did not include all the funding these companies have received for the timeframe specified in the request. She stated that she did not just want the information for the ESP but to receive *all* the grants that each of the companies mentioned received.
54. VB does not consider this is what the request, as worded, covers. It believes the correct interpretation is all the funding the companies received for the ESP. It stated that had the complainant want all the funding these companies had received, not just for the ESP, she should have worded this question differently and specifically stated that she requires all the funding these companies have received and it to include VE data to.
55. The Commissioner understands the BTA trades as either VB or VE and the ESP was a VB programme. She also understands that the complainant is a former employee of VB, specifically worked in the area to which the requested information relates and would know of the different trading names.
56. That being said she considers it is a particularly harsh approach to take when receiving requests for information. Applicants may refer to either of the three known names not necessarily wishing to narrow the request to the one used only. A more responsible approach would be to ask for clarification or indeed treat the request as a request made to the public authority as a whole.
57. The Commissioner also considers that although (with the exception of the VB and VE issue) the most natural reading of the request is the one VB had adopted, there is an alternative, objective reading which is that the question is seeking all funding, regardless of the budget or programme it is from, which was received by those identified as having received funding from the ESP across the public authority as a whole.
58. In the Information Tribunal hearing of *Berend v Information Commissioner and LBC Richmond upon Thames (EA/2006/0049 & 0050; 12 July 2007)* it was noted that the London Borough of Richmond (the council) received a request asking for:

"...all working papers and documents attached to agendas".

59. The tribunal found that the council had breached the FOIA in only considering working papers that were attached to agendas, even though this was an objective reading of the request. It stated that the council had failed to identify the alternative meaning, which would include all working papers.
60. It is the Commissioner's opinion in this case that because there are two alternative interpretations of this question, the complainant's interpretation should be accepted and this element of the request processed based on this interpretation in order for VB to have discharged its duties fully under the FOIA.
61. The Commissioner therefore requires VB to consider the complainant's reading or interpretation of this question and to either disclose any further recorded information it identifies as falling within scope or issue a fresh response under the FOIA.

Right of appeal

62. Either party has the right to appeal against this decision notice to the First-tier Tribunal (Information Rights). Information about the appeals process may be obtained from:

First-tier Tribunal (Information Rights)
GRC & GRP Tribunals,
PO Box 9300,
LEICESTER,
LE1 8DJ

Tel: 0300 1234504

Fax: 0870 739 5836

Email: GRC@hmcts.gsi.gov.uk

Website: www.justice.gov.uk/tribunals/general-regulatory-chamber

63. If you wish to appeal against a decision notice, you can obtain information on how to appeal along with the relevant forms from the Information Tribunal website.
64. Any Notice of Appeal should be served on the Tribunal within 28 (calendar) days of the date on which this decision notice is sent.

Signed

Samantha Coward
Senior Case Officer
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Annex

"Please supply the following information under the Freedom of Information Act 2000 relating to:

ESP Committee

1. All copies of minutes from The Event Support Programme committee meetings and grant decisions through 2016 and 2017 – **there should be no issue about releasing this information via FOI**
2. Copy of recommendation report undertaken by [name redacted] and which [name redacted] inputted into, my name is on it and **I was a co-author** of that document **that is an identifier**
3. Ideas document that I designed and drafted and that was sent to [name redacted] and [name redacted]. This is attached to an email sent to these men in Feb 2017. **I am the author of this document that is an identifier.**

Procurement

There are clear EC Directives which state that public procurements once completed should not be withheld from the public domain. You have no grounds for not releasing this information.

1. Tender as advertised for research of the gold list development / top 100 events. This should be in a folder on [name redacted]'s pc which say's 'tenders' or in a stand-alone folder under SFA Associates. Otherwise the documents should be on the server.
2. Procurement scoring sheets and soft copy of the excel scoring spreadsheet done for the Gold List Research tender that Sarah Fleming Associates won. There are a number of original and revised scoring sheets in [name redacted]'s files for this tender. Please ensure you send all copies of scoring sheets.
3. Advertised tender for the LinkedIn media buy which would have been drafted by [name redacted] and [name redacted]. Please also release all scoring sheets and documents relating to this tender exercise. [Name redacted] the procurement manager should have a copy of this tender and the excel scoring sheets etc. that took place for it.
 - Emails from [name redacted] to/from [name redacted] and [name redacted] questioning the options for this media buy in [name redacted]'s Microsoft outlook inbox

4. Advertised tender, procurement scoring sheets and soft copy of the excel scoring spreadsheet done for the BV&E promo film which Wilder Films was awarded as a first contract

- All emails sent to/from [name redacted] to [name redacted] and [name redacted] of Wilder Films and to/from [name redacted] and [name redacted] of Wilder Films

5. Advertised tender and procurement scoring sheets and soft copy of the excel scoring spreadsheet done for the short edits / out-takes of the BV&E promo film which Wilder Films was awarded as a second contract
- [name redacted] and [name redacted] should have this information

- All emails sent to/from all suppliers who bid for the 2nd BV&E film out-takes business from [name redacted]'s email account

- All comms sent out around this tender via the procurement portal

6. Advertised tender and excel procurement scoring sheets for BV&E promo film outtakes done for VisitEngland. These should be in the procurement files that [name redacted] holds they could also be in the BV&E folders in [name redacted]'s old files which should be on the server

- All emails that went out from [name redacted] to Motiv productions and the other suppliers who applied for the VisitEngland outtakes BV&E promo film tender

7. Advertised tender, all excel scoring sheets and all other documents relating to the sponsorship of the PCMS event that [name redacted] attended in Jan 2017 in the USA. [Name redacted] should have all the details of this procurement in the tender's folders if he doesn't have them they are in BV&E files in [name redacted]'s folders on the server

- All emails sent to/from [name redacted]'s (should be on the server) to PCMS contacts prior to his attending the US event in Jan 2017

8. Copy of the procurement exemption form was signed off for the PCMS by [name redacted] and [name redacted] this is in [name redacted]'s folders and should be on the server.

9. Advertised tender and all excel scoring sheets and tender documents for the Northstar media buy that was done in Jan/Feb 2017. This should be in Business Visits and Events folder or [name redacted] should have a copy in his procurement files.

- Emails to/from [name redacted]'s, [name redacted]'s, [name redacted]'s and [name redacted]'s outlook account to Northstar media buy
- 10. All emails sent to/from [name redacted] and [name redacted] by [name redacted] about conflict of interest declarations not being completed – check emails from [name redacted] to [name redacted] and [name redacted] (they should be on the server otherwise work backwards and check emails from [name redacted] to [name redacted]).
- 11. Emails sent from [name redacted] to/from [name redacted], [name redacted], [name redacted], [name redacted] and [name redacted] and [name redacted] about a supplying a list of the procurement they were planning

ESP Grant Programme

1. Print out from CODA showing all the funding that **all** grant applicants for the event support programme to date have received from VisitBritain between 2013 to 2017
2. Print out from CODA showing all the funding Marketing Manchester has received from 2013 to 2017 from VisitBritain
3. Emails sent to/from [name redacted] to/from [name redacted] in DCMS
4. [name redacted] inbox archive 'Marketing Manchester' folder emails to/from [name redacted], [name redacted] and [name redacted] from Marketing Manchester.
5. Documents which were being prepared for BEIS state aid review process that should be in these folders.
6. Customer profiles document that [name redacted] was developing related to the profiles on the Gold List – this is on the PC desktop of [name redacted].
7. Excel spreadsheet correcting the addresses and contact data from the Gold List this should be on the desktop of the PC [name redacted] was working on until Mar 1st "