

Date: 13 November 2020  
Our ref: 15108



**Mr P Jarvis**  
**By email**

**Legal Services**  
Oldham Council  
Civic Centre, West Street  
Oldham OL1 1UG

Dear Mr Jarvis,

**Re: Request for Information under Freedom of Information Act 2000**

In response to your request for information regarding media expenditure. Oldham Council is happy to supply the be below information.

- 1. I request the following information regarding Oldham Council's expenditure specifically with the following media outlets:**
  - The Oldham Evening Chronicle
  - The Oldham Times
  - Manchester Evening News

**I request this expenditure to be broken down as follows:**

- For the periods of
  - 01/01/2011 - 31/12/2011
  - 01/01/2012 - 31/12/2012
  - 01/01/2013 - 31/12/2013
  - 01/01/2014 - 31/12/2014
  - 01/01/2015 - 31/12/2015
  - 01/01/2016 - 31/12/2016
  - 01/01/2017 - 31/12/2017
  - 01/01/2018 - 31/12/2018
  - 01/01/2019 - 31/12/2019
  - 01/01/2020 - present date

Answer - Detail by year:

<b>Oldham Evening Chronicle</b>	<b>£</b>
01/01/2011 - 31/12/2011	14,050
01/01/2012 - 31/12/2012	42,057
01/01/2013 - 31/12/2013	70,133
01/01/2014 - 31/12/2014	81,359
01/01/2015 - 31/12/2015	61,623
01/01/2016 - 31/12/2016	65,892
01/01/2017 - 31/12/2017	36,392
<b>Grand Total</b>	<b>371,506</b>

<b>Manchester Evening News</b>	<b>£</b>
01/01/2011 - 31/12/2011	32,792
01/01/2012 - 31/12/2012	49,106
01/01/2013 - 31/12/2013	19,435
01/01/2014 - 31/12/2014	6,345
01/01/2015 - 31/12/2015	6,253
<b>Grand Total</b>	<b>113,931</b>

<b>Combined Total</b>	<b>£</b>
01/01/2011 - 31/12/2011	46,843
01/01/2012 - 31/12/2012	91,162
01/01/2013 - 31/12/2013	89,568
01/01/2014 - 31/12/2014	87,704
01/01/2015 - 31/12/2015	67,876
01/01/2016 - 31/12/2016	65,892
01/01/2017 - 31/12/2017	36,392
<b>Grand Total</b>	<b>485,437</b>

**2. What is the total expenditure given to each of these media outlets individually for the above stated periods altogether?**

Total media expenditure across all years is set out below:

- The Oldham Evening Chronicle - £371,506
- The Oldham Times - £nil spend
- Manchester Evening News - £113,931

**3. What is the total expenditure for all three media outlets for the above stated periods?**

This is included in the information above

**4. Please can you confirm where the money for these expenditures came from?**

The expenditure came from Council approved budgets.

**5. Who made the request for the money to pay for these expenditures?**

**6. Please provide copies of emails / notes / invoices to confirm.**

With regard to questions 5 and 6 please note that under the Freedom of Information Act 2000, Oldham Council has a duty to supply any information on request, unless there is an exemption. It is our policy only to apply the exemptions where there is a genuine risk of harm or prejudice. In these cases, we will still provide information if it is in the public interest to do so.

In this instance, we believe that it is not in the public interest to disclose the information to you. Information about the exemption is included here.

Section 12 of the Act makes provision for public authorities to refuse requests for information where the cost of dealing with them would exceed the appropriate limit, which for Local Government is set at £450. This represents the estimated cost of one person spending 18 hours at £25 per hour in determining whether the Council holds the information i.e. in locating, retrieving and extracting the information.

In order to provide you with the information on the scale that you have requested would require over 1,000 separate transactions to be looked up for invoice detail and budget approver details. Each transaction would take between 5 and 10 minutes plus time taken to summarise the details requested which will take an estimated 90+ working hours.

We estimate that it will take us in excess of 18 hours to determine the appropriate material and locate, retrieve and extract the information in reference to your request. Therefore, your request will not be processed further.

You may wish to refine your request by narrowing its scope by being more specific about what information you particularly wish to consider, including any dates or period of time relevant to the information required.

Section 40 of the Freedom of Information Act provides an exemption from the right to information if it is personal data as defined in the data protection act. "Personal data" means any information relating to an identified or identifiable living individual.

"Identifiable living individual" means a living individual who can be identified, directly or indirectly, in particular by reference to –

- (a) an identifier such as a name, an identification number, location data or an online identifier, or
- (b) one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the individual.

Section 40 of the FoIA states –

- (2) Any information to which a request for information relates is also exempt information if—
  - (a) it constitutes personal data which does not fall within subsection (1), and
  - (b) the first, second or third condition below is satisfied.
- (3A) The first condition is that the disclosure of the information to a member of the public otherwise than under this Act—
  - (a) would contravene any of the data protection principles, or
  - (b) would do so if the exemptions in section 24(1) of the Data Protection Act 2018 (manual unstructured data held by public authorities) were disregarded.

**7. Please also confirm the details of staff that have been recruited from either of the above mentioned media outlets either on a freelance or permanent position in to the Council, including salaries.**

Oldham Council do not directly recruit from other organisations, all positions within the Council have to go through one of the following procedures :-

***Recruitment Process***

All vacancies are prioritised to those on the redeployment register (people that may be at risk of redundancy), in the first instance.

Standard Route - Following from the above and depending on the grade of the vacancy, the vacancy will be advertised in stages in order of priority to internal candidates, people on the GOW register, Oldham Residents or external candidates. All of this takes place via Engage ATS and advertisements that are not restricted to internal candidates will be placed on Greater Jobs.

For Directorships and where the above has been exhausted, managers have the option to request that a direct or executive search is carried out by an employment or advertising agency.

There may be other ways employees are appointed to a vacancy in the Council via partnerships/agreements in place, such as Graduate training schemes.

Under the Freedom of Information Act 2000 (FoIA), the Council has a duty to confirm whether or not it holds the information you seek, and supply the information to you, unless there is an exemption under the Act that applies.

Section 40 of the FoIA provides an exemption from the right to information if it is personal data as defined in the data protection act. "Personal data" means any information relating to an identified or identifiable living individual.

"Identifiable living individual" means a living individual who can be identified, directly or indirectly, in particular by reference to –

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  - (a) would contravene any of the data protection principles, or
  - (b) would do so if the exemptions in section 24(1) of the Data Protection Act 2018 (manual unstructured data held by public authorities) were disregarded.

**8. Please can the information include times and dates of appointments and also for freelance/consultancy roles, the amount spent on each occasion.**

Section 12 of the Act makes provision for public authorities to refuse requests for information where the cost of dealing with them would exceed the appropriate limit, which for Local Government is set at £450. This represents the estimated cost of one person spending 18 hours at £25 per hour in determining whether the Council holds the information i.e. in locating, retrieving and extracting the information.

To look at all freelance/consultancy appointments over the periods outlined would take over 18 hours as we would need to identify all consultants who have provided services for the Council and manually go through each CV/work history to identify the organisations they have previously worked for.

If you disagree with the exemption applied to this information, you may appeal to

Director of Legal Services  
Oldham Council  
Civic Centre, West St,  
Oldham OL1 1UG

E-mail: [Legal.Services@oldham.gov.uk](mailto:Legal.Services@oldham.gov.uk)

Should you further disagree with the decision following the appeal you may wish to contact the Office of the Information Commissioner:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

<https://ico.org.uk/make-a-complaint/>  
Tel: 0303 123 1113

Yours sincerely

Oldham Council