

DWP Central Freedom of Information Team

e-mail: freedom-of-information-request@dwp.gov.uk

Our Ref: IR2019/24344

8 August 2019

Dear Alexander Tiffin,

Thank you for your Freedom of Information (Fol) internal review request received on 28 June. You asked:

You state that it will be published at a future date but do not give that date as would normally be required under this exemption. Previous FOI cases handled by the ICO do not consider a vague timeframe acceptable. Therefore, I ask you reconsider this as this campaign is of extreme public interest. Furthermore, you will have a projected spend as the Metro have confirmed they use fixed prices for advertising and advertorials. In light of this you will have an approximate figure and also will have budgeted for it.

On point 2. You say that it will harm commercial interests. However, you have set a precedent by disclosing advertising costs before such as: Facebook campaigns, the Gogglebox campaign and radio advertising costs. The taxpayer and stakeholders have a right to know how much public money is being spent on advertising costs

In light of this, I ask you to reconsider publishing the overall projected cost or, the total spend to date on online advertising. The public interest far outweighs the commercial interest clause.

As you have stated that department staff acted as agents, this will also have a cost attached to it. The NAO report shows that everything is costed. Therefore, how much was spent on department staff who have been engaged on this campaign? Where they seconded from another role?

I look forward to a speedy response and, as before, I Will be publishing this request online due to the high public interest.

DWP Response:

In response to your request, I can confirm that the handling of your original request and response has now been appropriately reviewed by someone unconnected with the handling of your original request.

As a result of this review, I am satisfied that the original response was handled properly and that the outcome of your request was correct. The reasoning behind this decision is as follows:

- At the point of your request the media partnership with the Metro was still underway, and therefore we were unable to provide accurate spend figures. We do not routinely provide estimates or projections as these are not true reflections of the final price, once discounts or added media values have been taken into account. We committed in our last response to publish spend at the end of July. The exemption in section 22 of the Act does not require a set publication date to be in place. It is sufficient that publication will take place once other actions have taken place. We therefore uphold the decision to exempt this request under section 22 as it specifically relates to information that is intended for publication at a future date.

We can confirm that the Metro media partnership final spend has now been published and can be viewed at <https://www.parliament.uk/depositedpapers>.

- In response to your second point we refer you to our previous response. If you are referring to costs for online adverts served as part of the Metro partnership, these cannot be disaggregated from the overall partnership spend as this would be prejudicial to commercial interests. In addition, disclosure would be likely to harm the Government media buying agency MG OMD's ability to negotiate best value for departments in the future as all their media buying rates and commercial agreements are confidential and commercially sensitive. If your request relates to broader online advertising spend to date we would be able to provide you with this information but to be able to do this we would require you to narrow your request, for example:
 - Providing clarification on the type of online advertising you are interested in;
 - Specifying the time period you wish the response to cover.
- In response to your request for all staff costs relating to the campaign, as this did not form part of your original request, we are responding to this element as a new FOI request. If you are not happy with this response you may request an internal review by e-mailing freedom-of-information-request@dpw.gov.uk or by writing to DWP, Central FOI Team, Caxton House, Tothill Street, SW1H 9NA. Any review request should be submitted within two months of the date of this letter. We estimate that the cost of complying with this element of your request would exceed the appropriate limit for central Government, set by regulations at £600. This represents the estimated cost of one person spending 3½ working days in determining whether the Department holds the information, and locating, retrieving and extracting it. Under section 16 of the Act we should help you narrow your request so that it may fall beneath the cost limit. DWP employees managing the partnership were not seconded from elsewhere and this activity formed part of their existing role. Since the staff concerned do not record the time taken for specific components of their day to day roles, we would be unable to provide the kind of cost breakdown that you are seeking within the appropriate cost limit.

If you have any queries about this letter, please contact the Department quoting the reference number above.

Yours sincerely,

Your right to complain under the Freedom of Information Act

If you are not content with the outcome of the internal review you may apply directly to the Information Commissioner's Office for a decision. Generally, the Commissioner cannot make a decision unless you have exhausted our own complaints procedure. The Information Commissioner can be contacted at: The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow Cheshire SK9 5AF
Web: ico.org.uk/Global/contact_us or telephone 0303 123 1113 or 01625 545745