



Ministry of Housing,
Communities &
Local Government

**Ministry of Housing, Communities and Local
Government**

Fry Building
2 Marsham Street
London
SW1P 4DF

T 030 3444 0000

www.gov.uk/mhclg

Mr Edward Williams
Via email

Date: **18 December 2020**

Dear Mr Williams

Internal review under the Freedom of Information Act 2000 - 8686926

Thank you for your request for a review received on 6 October 2020. I am sorry that you are dissatisfied with our attempts to handle your request under the Freedom of Information Act 2000. I am the review officer appointed to undertake the internal review and I am writing to provide a response. I had no involvement in the original response to your request.

Background

1. On 10 August 2020, you requested:

"1. Provide all the data, in date order if possible, collected and passed to you by Faculty under the contract mentioned above. I am happy to have this in DVD or CD format for Msft Windows or Linux pc.

2. Provide the specification for the work.

3. Provide all relevant invoices.

4. Provide a list of all those invited to tender for the job."

2. On 6 October 2020, the Department responded to your request, withholding information regarding parts 1 and 3 under section 43(2) of the FOIA; and providing the information for parts 2 and 4, including publicly accessible links to the information.

3. On 6 October 2020, you requested an internal review:

"For Q1, the data requested could potentially be used to gain an insight into the methodology that Faculty used to deliver this work and would therefore be likely to harm their own commercial interests."

Explain how releasing data would 'gain an insight into the methodology that Faculty used'. Explain how this would prejudice any person and to what extent."

Appeals Officer's Response

4. I have reviewed the response previously sent to you on 6 October 2020 and have contacted the policy team that holds the information within scope of question 1, asking them to consider your request once again.
5. Based on these conversations, I have partially upheld your complaint, insomuch as some information should have been provided in our original response. However, I have maintained the exemption used under section 43(2) of the FOIA for a small amount of information, as disclosure would be likely to prejudice the commercial interests of the Department and Faculty.
6. Some data you have requested includes weights that have been calculated and assigned by Faculty. These weights determine the relative importance of data in the model and their accurate calculation is critical to the reliability of a model of this type. The release of these weights alongside other publicly available data could be used to gain an insight into the methodological approach Faculty used to deliver this work. Faculty have confirmed that disclosure of this data would be likely to harm their commercial interests, giving competitors an insight into their methodology and approach.
7. The Department understands there is a high public interest in the work carried out by Faculty. Providing further information used in this project would enable the general public to better appreciate what work was being carried out.
8. On the other hand, the Department also wishes to protect its commercial interests and ability to participate in future commercial activity. Given that Faculty has confirmed the disclosure of this information would be likely to harm their commercial interests, it is therefore not in the public interest to disclose the withheld information. This would likely lead to less trust in the Department, thus having a detrimental effect on any future business activity with other third party organisations in the same field.
9. Regarding the information we can now disclose to you, it may be helpful to explain that in April, the Department identified an urgent need to bring in additional analytics support to help inform our response to the COVID-19 pandemic and awarded a call-off contract to data science provider Faculty.
10. The scope of the work covered two areas:

Part 1: analysis of free text collected by MHCLG to gain insights on how local areas coped with and responded to the COVID-19 pandemic;

Part 2: topic analysis of social media to understand public perception and emerging issues of concern to the Government arising from the COVID-19 pandemic.

11. As part of this work, Faculty collected data from social media, in line with relevant terms and conditions for developers. The data collected enabled the Department to understand how the social media discourse relating to key subject areas evolved over the period that the data was collected by highlighting emerging trends, frequency and commonality of words associated with each of the subject areas; and how these changed.
12. The key subject areas were chosen by the Department and provided to Faculty, who then developed their own methodology based on the requirements of the work. The raw data created by this process was then provided to the Department in spreadsheet form.
13. All data has subsequently been deleted by Faculty in line with contractual requirements.
14. The Department is satisfied that the service provided by Faculty was of a high standard and delivered value for money. The contract ended on 16 July 2020 and a Data Protection Impact Assessment was carried out. As provided to you in our letter of 6 October, all details of the contract can be found on Contracts Finder at the following link:

<https://www.contractsfinder.service.gov.uk/Notice/b7bbcaf0-22f0-4684-9a22-06667fdd2177?origin=SearchResults&p=1>

Conclusion

15. Having reviewed this case I have concluded that whilst some information was correct to be withheld under section 43(2) of the FOIA, I have partially upheld your complaint as some information should have been disclosed to you and for that I apologise.
16. Please find the information disclosable to you in the 62 Excel spreadsheets provided via email.
17. If you are unhappy with the outcome of this internal review, you can ask the independent Information Commissioner to investigate. The Information Commissioner can be contacted at email address casewoxx@xxx.xxx.xx or use their online form at ico.org.uk/concerns or call them on 0303 123 1113.

Yours sincerely

Andy Jennings