



Homes England

Date: 10 May 2024

Our Ref: RFI4695

Tel: 0300 1234 500

Email: infogov@homesengland.gov.uk

[REDACTED]
By Email Only

Dear [REDACTED]

RE: Request for Information – RFI4695

Thank you for your request for information which was processed in accordance with the Freedom of Information Act 2000 (FOIA).

You requested the following information:

**Who from Homes England (Permanent, interim, contractor) attended the MIPIM conference this year?
A list of name will suffice. (eg Peter Denton, Ken Glendinning etc)**

Can you also tell me :

How many days in total did Homes England representatives spend there

what the total cost of the travel expenses were

what the total cost of the accommodation was

The top three hotels that may have been used (by cost)

What 'entertainment' was provided (eg Savills, or CBRE lunch, dinner etc)

Which UK local authorities and Agents were engaged in meetings with Homes England representatives

Response

We can confirm that we do hold some of the requested information as at the date of your request. We will address each of your questions in turn.





Homes England

Date: 10 May 2024

Our Ref: RFI4695

Tel: 0300 1234 500

Email: infogov@homesengland.gov.uk

Who from Homes England (Permanent, interim, contractor) attended the MIPIM conference this year? A list of name will suffice. (eg Peter Denton, Ken Glendinning etc)

We can confirm that there was a total of 7 attendees from Homes England who attended the MIPIM conference. However, we rely on Section 40 (2) of the FOIA to withhold some of the information from disclosure.

Section 40 – Personal information

We are withholding some information on the grounds that it constitutes third party personal data and therefore engages section 40(2) of the FOIA.

To disclose personal data, such as names, contact details, employment status and personal opinions could lead to the identification of third parties and would breach one or more of the data protection principles.

Section 40 is an absolute exemption which means that we do not need to consider the public interest in disclosure. Once it is established that the information is personal data of a third party and release would breach one or more of the data protection principles, then the exemption is engaged.

The full text in the legislation can be found on the following link:

<https://www.legislation.gov.uk/ukpga/2000/36/section/40>

Advice and Assistance

We have a duty to provide advice and assistance in accordance with Section 16 of the FOIA. To comply with this duty we are able to provide the below list which contains the job titles and department the delegates sit in. However, please note that we have provided senior employees' names within Homes England as those roles are public facing and the information is already publicly available.

- Peter Freeman - Chairman
- Mike Palin - Executive Director - Markets, Partners and Places
- Ken Glendinning - Director – Acquisitions and Partnering
- Director - Regional
- Director - Loans
- Assistant Director - Structured Real Estate Finance
- Assistant Director – Communications





Homes England

Date: 10 May 2024

Our Ref: RFI4695

Tel: 0300 1234 500

Email: infogov@homesengland.gov.uk

How many days in total did Homes England representatives spend there

We can confirm that the attendees spent between two and five days at the conference.

what the total cost of the travel expenses were

We can confirm that the total spent on travel expenses was £5,960.28.

what the total cost of the accommodation was

We can confirm that the total spend on accommodation was £10,358.76.

The top three hotels that may have been used (by cost)

We can confirm that only one hotel was booked in France for all attendees with the total hotel cost being £10,238.43. There was also an additional hotel booked near one of the departure airports of which £99.90 from the total spend above was for.

Section 38 – Health and Safety

The information requested relating to the name of the hotels booked, engages sections 38(1) and 38(2) of the FOIA as its release would, or would be likely to, endanger the physical and mental health and safety of individuals. Sections 38(1) and 38(2) are interconnected, we consider that in this context, any harm to the safety of individuals (as prescribed in section 38(2)) would, or would be likely to, cause physical and mental health harm as set out in section 38(1). For the purpose of this response, we refer to the two sections as “Section 38”.

Section 38 is a qualified exemption. This means that once we have decided that the exemption is engaged, Homes England must carry out a public interest test to assess whether or not it is in the wider public interest for the organisation to confirm or deny that we hold the information.

Arguments in favour of disclosure:

- Homes England is compliant with the government agenda of transparency and recognises the benefit of publishing the information, particularly when it concerns how Homes England undertakes its work and spends public money.

Arguments in favour of non-disclosure

- Homes England believes that it should not disclose the details of the hotel stayed at as this would be likely to endanger the safety of individuals who stayed at/may stay at this hotel in the future;





Homes England

Date: 10 May 2024

Our Ref: RFI4695

Tel: 0300 1234 500

Email: infogov@homesengland.gov.uk

- Disclosure of this information would reveal the travel patterns and accommodation of Homes England staff. There is a risk that disclosing this information would endanger the safety and therefore physical health of Homes England staff. The release of this information would allow for individuals to be tracked which would clearly be a potential safety concern as the MIPIIM conference is an annual event;
- Disclosure to the wider public of the name of the hotel (and therefore it's address) could be used to plan a disruption or commotion if Homes England staff were to stay there again. This would cause a direct threat to the safety of Homes England Staff and the general public as the information could be used to compromise the security of venue;
- Homes England considers that the public interest in this request lies with the allocation and spending of public funds, not the precise location and specific travel arrangements of Homes England staff. Homes England considers it has met its transparency obligations in this area by the issuing of this response and the information it already proactively publishes concerning spend; and
- Homes England has been unable to identify a wider public interest in disclosing the information requested.

Homes England believes that to disclose this information to the wider public would undermine the security measures designed to protect both public health and safety and the safety of individuals at this venue.

Therefore, after careful consideration we have concluded that at this time, the balance of the public interest favours the non-disclosure of the name of the hotels.

The full text of the legislation can be found via the following link:

<https://www.legislation.gov.uk/ukpga/2000/36/section/38>

What 'entertainment' was provided (eg Savills, or CBRE lunch, dinner etc)

We can advise that Homes England did not host any "entertainment" events. At the time your request was submitted, Homes England did not hold information relating to "entertainment" provided to Homes England staff. However, we can confirm that since then, delegates have submitted that they have accepted invitations to attend 8 breakfast/brunches, 19 coffees/drinks, 8 lunches, 9 dinners and 7 receptions.

Which UK local authorities and Agents were engaged in meetings with Homes England representatives

We can confirm that Homes England did not attend any meetings with UK local authorities however we can confirm that we did take part in panel events that were hosted by UK local authorities: Newcastle & Gateshead, Manchester, Liverpool and Belfast.





Homes England

Date: 10 May 2024

Our Ref: RFI4695

Tel: 0300 1234 500

Email: infogov@homesengland.gov.uk

Right to Appeal

If you are not happy with the information that has been provided or the way in which your request has been handled, you may request an internal review. You can request an internal review by writing to Homes England via the details below, quoting the reference number at the top of this letter.

Email: infogov@homesengland.gov.uk

Information Governance Team
Homes England
Windsor House
6th Floor
42-50 Victoria Street
London
SW1H 0TL
United Kingdom

Your request for review must be made in writing, explain why you wish to appeal, and be received within 40 working days of the date of this response. Failure to meet this criteria may lead to your request being refused.

Upon receipt, your request for review will be passed to an independent party not involved in your original request. We aim to issue a response within 20 working days.

You may also complain to the Information Commissioner's Office (ICO) however, the Information Commissioner does usually expect the internal review procedure to be exhausted in the first instance.

The Information Commissioner's details can be found via the following link:

<https://ico.org.uk/>

Please note that the contents of your request and this response are also subject to the Freedom of Information Act 2000. Homes England may be required to disclose your request and our response accordingly.

Yours sincerely,

6th Floor
Windsor House
42 - 50 Victoria Street, Westminster
London, SW1H 0TL

0300 1234 500
@HomesEngland
www.gov.uk/homes-england





Homes England

Date: 10 May 2024

Our Ref: RFI4695

Tel: 0300 1234 500

Email: infogov@homesengland.gov.uk

The Information Governance Team

For Homes England

6th Floor
Windsor House
42 - 50 Victoria Street, Westminster
London, SW1H 0TL

0300 1234 500
@HomesEngland
www.gov.uk/homes-england

