

By Email Only

Dear

#### RE: Request for Information – RFI5073

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:

This is an information request relating to the MIPIM conference held in Cannes from 10<sup>th</sup> to 14<sup>th</sup> March 2025

Please include the following information:

- Did any members of the organisation attend MIPIM in an official capacity? If so, how many attended and what are their job titles?
- If so, what was the total spend by the organisation on attending the conference? (please make clear how much was spent by the organisation itself, and how much it received, if any, in sponsorships or grants)
- How much was spent on flights? (please provide information on the airline, and the class)
- How much was spent on accommodation? (Please provide the name and address of the hotel)
- How much was spent on food and subsistence? (Please provide receipts for any restaurants, cafes or bars visited)
- How much was spent on conference costs? For example, tickets to the conference, any stands set up at the conference

2<sup>nd</sup> Floor The Lumen St James Boulevard, Newcastle Helix Newcastle upon Tyne, NE4 5BZ



#### <u>Response</u>

We can confirm that we do hold some of the requested information. We will answer your questions in turn below:

Did any members of the organisation attend MIPIM in an official capacity? If so, how many attended and what are their job titles? We can confirm 8 member of Homes England staff attended the conference. The job roles of the staff that attended are as follows: Senior Manager (1 staff member) Director (4 staff members) Assistant Director (2 staff members) CEO (1 staff member)

If so, what was the total spend by the organisation on attending the conference? (please make clear how much was spent by the organisation itself, and how much it received, if any, in sponsorships or grants) We can confirm the total cost of attending the conference is £30,689 to date. We can confirm that we did not receive any sponsorships or grants to attend the conference.

Please be advised that staff are permitted to submit expense claims up to 3 months after the date the expense occurred, so it is possible this figure may increase.

How much was spent on flights? (please provide information on the airline, and the class) How much was spent on accommodation? (Please provide the name and address of the hotel) We can confirm the total spent on flights was £4,232 and on accommodation the total spent was £9,916.22. We can further confirm that staff flew using economy class and used budget hotels whenever feasible.

We can confirm that we hold information relating to the airline used by staff for travel and the name and address of the hotel used by staff for accommodation. However, we rely on section 38 of the FOIA to withhold the information from disclosure.

#### Section 38 – Health and Safety

The information requested relating to the name of the airline and hotel booked as well as the address of the hotel, engages sections 38(1)(a) and 38(1)(b) of the FOIA as its release would be likely to endanger the

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physical health and safety of individuals. Sections 38(1)(a) and 38(1)(b) are interconnected, we consider that in this context, any harm to the safety of individuals (as prescribed in section 38(1)(b)) would be likely to cause physical harm as set out in section 38(1)(a). For the purpose of this response, we refer to both parts of "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 disclose 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 airline booked or hotel stayed at as this would be likely to endanger the safety of individuals who may use the same airline and hotel in the future;
- Disclosure of this information would reveal the travel and accommodation patterns of Homes England staff. There is a risk that disclosing this information would be likely to 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 safety concern as the MIPIM conference is an annual event;
- Disclosure to the wider public of the name of the airline and hotel could be used to plan a disruption or commotion if Homes England staff were to use the same airline or hotel again. This would be likely to 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 travel and accommodation for the event;
- Homes England considers that the public interest in this request lies with the allocation and spending of public funds, not the precise and specific travel and accommodation 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.

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

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 airline.

The full text of the legislation can be found via the following link: <u>https://www.legislation.gov.uk/ukpga/2000/36/section/38</u>

#### How much was spent on food and subsistence? (Please provide receipts for any restaurants, cafes or bars visited)

We can confirm the total spent on food and subsistence is £404.21 to the date of your request. Please be advised that staff are permitted to submit expense claims up to 3 months after the event, so it is possible this figure will increase.

Please find enclosed with this response **Annex A**, a copy of the receipts submitted by staff in order to claim expenses incurred for the conference. You may note that the total amount on receipts is greater than the total spent on food and subsistence outlined above, this is because staff are given a maximum claim amount for subsistence. This means that where an expense was greater than the maximum claim amount, only the maximum claim amount would have been paid.

Some information in **Annex A** has been withheld from disclosure under Section 38 of the FOIA and Section 40 of the FOIA.

#### Section 38 – Health and Safety

The information requested relating to the dates of visit and location of the establishment contained within the receipts engages sections 38(1)(a) and 38(1)(b) of the FOIA as its release would be likely to endanger the physical health and safety of individuals. Sections 38(1)(a) and 38(1)(b) are interconnected, we consider that in this context, any harm to the safety of individuals (as prescribed in section 38(1)(b) would, or would be likely to, cause physical 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,

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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 disclose 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

- Disclosure of information related to the outlets where food and subsistence was obtained would
  reveal the locations of Homes England staff at various points during the conference, including when
  travelling to and from the conference. This information directly relates to the information we have
  withheld from disclosure in response to your earlier questions on flights and hotels. We consider
  that the exact same harm would be likely to be caused by the release of this information.
- Homes England believes that it should not disclose the details of the dining venues visited as this would be likely to endanger the safety of individuals who may use the same venues in the future;
- Disclosure of this information would reveal the dining locations and travel plans of Homes England staff. There is a risk that disclosing this information would be likely to endanger the safety and therefore physical health of Homes England staff. The release of this information could allow for individuals to be tracked which would clearly be a safety concern as the MIPIM conference is an annual event;
- Disclosure to the wider public of the name and address of the dining venues could be used to plan a disruption or commotion if Homes England staff were to use the same venues again. This would be likely to 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 venues while attending the event;
- Homes England considers that the public interest in this request lies with the allocation and spending of public funds, not the precise and specific dining 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 of individuals while attending the conference.

2<sup>nd</sup> Floor The Lumen St James Boulevard, Newcastle Helix Newcastle upon Tyne, NE4 5BZ



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

The full text of the legislation can be found via the following link: <u>https://www.legislation.gov.uk/ukpga/2000/36/section/38</u>

#### How much was spent on conference costs? For example, tickets to the conference, any stands set up at the conference

We can confirm the ticket passes to the conference cost £16,005 in total. We can confirm no stands were set up at the conference. The only additional conference cost was for marketing collateral for Linked-in posts, which cost £125.00 in total.

#### **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 The Lumen 2<sup>nd</sup> Floor St James Boulevard Newcastle Helix Newcastle upon Tyne NE4 5BZ 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.

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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,

The Information Governance Team For Homes England

2<sup>nd</sup> Floor The Lumen St James Boulevard, Newcastle Helix Newcastle upon Tyne, NE4 5BZ

18:13

Mail



sales-receipt.sumup.com



Merchant ID: Transaction ID: Receipt no.:



#### **TAAAT3FCYDV**

#### Sale

#### 14-03-2025 17:39 GMT

Description

#### VAT Amount

1 x Custom amount

20% £28.00

VAT %	Net	VAT Gross
20%	£23.33	£4.67 £28.00



This payment was made with SumUp.

18:13

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#### receipts-ng.sumup.com



Merchant ID: Transaction ID: Acquirer MID: Terminal ID: Receipt-No.:



TAAAT3FCYDV

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S20250004272

MASTERCARD \*\*\*\* \*\*\*\* \*\*\*\* s. 40(2)



Contactless

Description	Net	VAT	Gross
Custom amount	1 x 23.33	4.67 (20.0%)	28.00
Total:		£28	8.00
No verification			
I AGREE TO PAY THE ABOVE TOTAL AMOUNT ACCORDING TO THE CARD ISSUER AGREEMENT			

Sale

14-03-2025 17:39

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#### CARTE BANCAIRE SANS CONTACT

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NO AUTO: 040571 MONTANT : 25,80 EUR



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#### Echange ou remboursement sous 15jours PRODUITS FRAIS NON REMBOURSABLES

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# **S.** 38

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Total	Tva	z (* 14	2,27
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s. 38 19:28:52 Kiosk n°1

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Order receipt

#### Paid COMMAND N°12

Take away

Client s. 40(2)

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Buddha bowl

14.90

1x Sauce soja

#### TOTAL €14.90

Total	13.55	1.35	14.90
10%	13.55	1.35	14.90
Rate	Excl. Tax	VAT	Incl. Tax

Please go to the cashier so you can get your order back

Powered by Tabesto

CARTE BANCAIRE SANS CONTACT LCL A000000031010 VISA CREDIT Le **s. 38** a 19:30:16 **s. 38** s. 38 CANNES 2150527 42948142700095 30002 ###############s. 40(2) F4AFEAB55C289A38 002 001 000059 C @ NUM AUTO : 006745 MONTANT : 14,90 EUR DEBIT

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# s. 38

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#### sales-receipt.sumup.com



Merchant ID: Transaction ID: Receipt no.:



# S. 38 12:29 GMT

Description

VAT Amount

1 x Custom amount

20% £28.00

		£28.00
Total:		£28.00
VAT %	Net	VAT Gross
20%	£23.33	£4.67 £28.00



This payment was made with SumUp.

#### 09:11



#### receipts-ng.sumup.com



Merchant ID: Transaction ID: Acquirer MID: Terminal ID: Receipt-No.:

s. 38

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MASTERCARD



Contactless



#### I AGREE TO PAY THE ABOVE TOTAL AMOUNT ACCORDING TO THE CARD ISSUER AGREEMENT

#### No verification

#### Total:

£28.00

#### Custom amount

Description

4.67 1 x 28.00 23.33 (20.0%)

Net VAT Gross

#### CARTE BANCAIRE SANS CONTACT

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CANNES s. 38

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7605326 42810864100021 10096 ##########\$\$. 40(2) 515E47FB98084226 003 701 000761 C @ NUM AUTO : AWAXX J MONTANT 37,40 EUR

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TICKET CLIENT A CONSERVER

N° serveur: 05

### CARTE BANCAIRE SANS CONTACT **))))**

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#### Pour information 157,43 FRF

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Lundi au samedi Dimanche	8h30 à 20h 9h à 20h	
TVA DESCRIPTION	QTE X P.U.	NONTANT TTC
6 +MINI GAUFRES CHOCO		5.25€
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#### Echange ou remboursement sous 15jours PRODUITS FRAIS NON REMBOURSABLES

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s. 38

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#### Vente

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Article			Montant
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Sous-total			17,00 €
Total		17	7,00 €
TVA %	Net	TVA	Brut
A 20%	14,17 €	2,83 €	17,00 €

#### Copie client

Identifiant marchand:	s. 38
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Montant	17,00 €

Pas de vérification du titulaire de la carte

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VEUILLEZ CONSERVER UNE COPIE POUR VOS DOSSIERS

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#### CARTE BANCAIRE SANS CONTACT CREDIT AGRICOLE PROVENCE COTE D'AZUR

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CB S. 38		0 218.79€
Taux 1	VA.	Hors Taxe

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	10.00		0.2		2.14
	10.00				**************************************

#### Echange ou remboursement sous 15jours PRODUITS FRAIS NON REMBOURSABLES

Tous les produits non alimentaires bénéficient auprès du vendeur d'une garantie légale de conformité d'une durée minimple de deux uns à compter de leur remise au consommateur

# MIPIM Lanch: 7.70 5.38

# s. 40(2)

1 x SW MONTAGNARD 1 x DEJ 2 1 x TOURTE CHEVRE AUBE IND 1 x TARTEL RHUBARBE IND 7.70 E 12.70 X - E - B

# 1 x PERRIER CITRON 50CL- E1 x SAC KRAFT PAUL0.20 CTOTAL20.60

TTC TUA HT 3.79 4.00 B TVA 5.50 % 0.21 C TUR 20.00 0.03 0.17 0.20 E TVA 10.00 1.49 16.40 14.91 1.73 18.87 20.60 CARTE BLEUE (3) ( PASSAGE )

 To:017 Doc:1567464 Lg:3 B0002 g\_U\_ SPIN.MANF01.U9

 S. 38
 13:44:56 (A EMPORTER)

 CLe 170-Serv:170 Caisse 2
 Num:0023012/001



# CARTE BANCAIRE SANS CONTACT A000000031010 VISA CREDIT LE S. 38 S. 30 12:26:19 s. 38 **S 3468169700056** ############S. 40(2) 7638E4807C56FAA9 001 000071 21 C @ NO AUTO: 087222 MONTANT :

# 7,30 EUR







Thank you for your order

If you require a breakdown of the VAT, please speak to a member of the bar staff.

VAT Number -396 331 433

Payment Transaction Reference - 624500319132











s. 38 2025 CAISSIER 1

#### Ticket en EUR

VITTEL/VICHY 12,00 4,00 EUR 3 x 3,80 PETIT CAFE AU LAIT

15,80 TOTAL STAR 15,80 ESPECES Plan of 3 V toth whe granting formulay seev philipped | rean

Tva4 10,00 % = 1,44 (HT= 14,36 ) 1,44 Total Tva = Total HT = 14,36

## MERCI DE VOTRE VISITE





Sur place1 From BI Granola5.30JMS1 Croissant Jambon4.50FromageCarte Bleue9.80

 0.89 TVA 10%
 9.80

 TTL Net
 8.91

 Sous Total
 9.80

 Reglement
 **9.80**

\*\*\* Merci et bon voyage \*\*\*







# Total : 10.00E

#### 1 CARTE BANCAIRE : 10,00E

A TAUX REDUIT 10.0% : 0,91E HT = 9,09E / TTC = 10,00E

Merci de votre visite ! Numbre d'impressions : 1 Code caisse 3 / 2 lisne(s) Code NAF/APE : 56307 SIRET : 84433817800016 TVA Intracom : FR2844338178 034060 (NF525) B 0042 vij0 - Cashmag Android 13.00.009-P CARTE BANCAIRE



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11,80 EUR



# s. 40(2)

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MC

DTA

TUA **TTC** HT E TVA 10.00 10.00 11.00 1.00 10.00 1.00 11.00 CARTE BLEUE (3) ( PASSAGE ) To:017 Doc: 4567523 Lg:2 B0002 6Wi\_ SPIN.MANF01.U9 S. 38 15:17:39 (A EMPORTER) CLe 170-Serv:170 Caisse 2 Num:0023066/001 Montants exprimés en Euros Donnez-nous votre avis en Flashant ce ORCode



# S. 38

# DUPLICATA



2025 CAISSIER 1

Ticket en EUR

CAPUCCINO MOUSSELAIT DOUBLE EXPRESSO COCA-COLA CROQUE MONSIEUR VITTEL/VICHY 3,90 3,70 4,50

9,00 4,00

TOTAL ESPECES 25,1025,10Tva4 10,00 % = 2,28 (HT= 22,82)

Total Tva = 2,28 Total HT = 22,82

# MERCI DE VOTRE VISITE

S. 38 15:46:09 5 Articles P1 Tick: P1-N162 729-D13/03/25 Phi-Pos 14.0.92-Conf. CGI P I-3h



CARTE BANCAIRE SANS CONTACT CREDIT AGRICOLE PROVENCE COTE D'AZUR

LE S. 38 A 13:38:03 S. 38 S. 38 S. 38 S. 38 98353829900022 ############ S. 40(2) 44C887F1C4EDF71D 001 000038 140

A000000041010

DEBIT MASTERCARD

#### C @ NO AUTO: AYTE1Y MONTANT: 25,00 EUR

DEBIT TICKET CLIENT A CONSERVER MERCI AU REVOIR 2437MD8P1844



# 20% off food for the plane with this receipt!

S. 38





Take Away

## Order: 261

English Breakfast Tea Whole Milk Apple Bircher Ella Peanut Butter Oat Bar

4 Items

VAT20% TOTAL

£0.49 29.90 00.03

£2.95

£0.00

£4.10

£2.85

