

Reference: 2025-123

Thank you for your email in which you requested the following information under the Freedom of Information Act 2000 (FOIA):

**With regards to this contract:** SFO-INTEL-BVDMOODY'S-Database-OG - Contracts Finder

1. Please confirm the contract start and end dates, including any extension options exercised or available.
2. Please confirm the total contract value (or estimated value) and provide a breakdown by year or option period.
3. Please state the procurement route used and whether any other suppliers were considered at award stage.
4. Please provide a copy of the contract award decision or notice (redacted if necessary) and supplier details.
5. Please confirm the key performance indicators, service-level targets, or measurable outputs set at the start of the contract (for example: data quality, delivery timeliness, or system availability).
6. Where available, please provide any data or internal summaries showing supplier performance against those KPIs.
7. Please provide any available data relating to end-user usage of the contracted service (for example: number of active users, licences, or reports generated).
8. Please confirm which business unit or operational team is responsible for managing this contract and monitoring supplier performance.
9. Please confirm whether any concerns, clarifications, or performance issues have been raised with the supplier during the life of the contract — high-level detail only is required (for example, general themes, issue categories, or resolution summaries).
10. Please comment on whether product usage and anticipated benefits have been realised in accordance with the organisation's stated aims or intended business outcomes at the time of award.
11. Please explain the decision-making process for determining whether the contract will be terminated, extended, or re-procured. In particular, please clarify:
  - a. What criteria or governance thresholds are used to decide between renewal, extension, or re-tender;
  - b. Which roles or committees approve these decisions; and
  - c. The anticipated date or timeframe for making this decision for this specific contract.
12. Please confirm the expected process and timetable for publishing a Prior Information Notice (PIN) or any early market engagement notice relating to the replacement or re-tender of this contract — including the anticipated publication date, procurement route, and the portal or contact team through which such notices will be issued.
13. Please specify the most appropriate way for a supplier to express interest in future opportunities or upcoming re-procurements of a contract of this type (for

example, registration systems, email lists, market engagement events, or framework enrolment).

### **Response**

We confirm that the contract referenced in your Contact Finder link has expired. A new contract has been awarded and, where applicable, we have provided answers relating to both contracts. The most recent contract award can be found here: [SFO-INTEL-BVDMOODYS-Database - Find a Tender](#)

Please see below our response to your questions.

#### **Question 1**

Old contract: start date 11 August 2024, end date 10 August 2025.

New contract: start date 11 August 2025, end date 10 August 2026.

#### **Question 2**

Total value of old contract: £36,750.00 +VAT.

Total value of new contract: £42,263.00 +VAT.

#### **Question 3**

Both contracts were awarded via direct award.

#### **Question 4**

Old contract: as published on contract finder.

New contract: as published on Find a Tender.

#### **Question 5**

Not applicable. Both contracts are for licenses only and do not include specific key performance indicators or service-level targets.

#### **Question 6**

Not applicable.

#### **Questions 7, 9, & 10**

The SFO holds some of this information. However, it is exempt from release under section 31(1) and section 43(2) of the FOIA.

Section 31(1)(a), (b), and (c) provides that:

*Information which is not exempt information by virtue of section 30 is exempt information if its disclosure under this Act would, or would be likely to, prejudice—*

- (a) the prevention or detection of crime,*
- (b) the apprehension or prosecution of offenders,*
- (c) the administration of justice:*

#### **How the exemption is engaged**

As a law enforcement agency, the SFO holds highly sensitive information which is of interest to others, including those we investigate. Releasing detailed information about service usage and performance could therefore undermine our investigative functions, compromise our

ability to protect SFO investigative material, and provide insight which could provide excessive information into the public domain which would be accessible to criminals. This thereby prejudices the interests at (a), (b), and (c) above.

#### Public interest test

Sections 31(a), (b), and (c) are qualified exemptions and require consideration of whether, in all the circumstances of the case, the public interest in exempting this data outweighs the public interest in disclosing it. More information about exemptions in general and the public interest test is available on the ICO's website at [www.ico.org.uk](http://www.ico.org.uk).

It is recognised that there is a general public interest in publicising information about the SFO, so that the public knows that serious fraud, bribery, and corruption are being investigated and prosecuted effectively, and so that the public can be reassured about the general conduct of our organisation and how public money is spent.

However, having considered the public interest in releasing this information, we consider that the stronger interest lies in maintaining these exemptions of the FOIA. Primarily, the risk that this information could pose to the SFO's investigative functions against which it is essential to safeguard given the highly sensitive nature of the information held as a law enforcement agency. Releasing sensitive information about our contractual services risk compromising the SFO's ability to provide and maintain data security for the cases at pre-investigation, investigation, prosecution stages and beyond.

Having considered the opposing arguments, I believe that the stronger public interest lies in exempting the information from release.

Section 43(2) of the FOIA deals with commercial interests and provides that:

*Information is exempt information if its disclosure under this Act would, or would be likely to, prejudice the commercial interests of any person (including the public authority holding it).*

#### How the exemption is engaged

The requested information could detriment to the SFO's commercial interests if released by weakening its negotiating position with future suppliers. It could also detriment the commercial interests of the supplier when engaging future clients. As such, this information is exempt from release under section 43(2) of the FOIA.

#### Public interest test

Section 43 of FOIA is a qualified exemption. As such, it requires consideration of whether the public interest in exempting the information outweighs the public interest in disclosing whether the public authority holds the information. More information about exemptions in general and the public interest test is available on the ICO's website at [www.ico.org.uk](http://www.ico.org.uk).

We understand the importance of publicising information about the SFO's use of public resources and funding. However, we do not believe that disclosing some of the information in relation to this particular contract would add significantly to these factors and therefore feel there is minimal public interest in releasing this material. Further, as outlined above, the SFO is compliant with the reporting requirements across government, which requires the

publication of data surrounding procurement processes on the Contracts Finder website: Contracts Finder - GOV.UK.

We have therefore concluded that the balance of the public interest is in favour of not disclosing the information requested as the commercial interests weigh in favour of not sharing this detail externally.

**Question 8**

This information is available via both contract links referenced above.

**Question 11**

- a) This is an integral contract for an SFO Division and renewed annually.
- b) Decisions are approved by the Head of Division and Head of Commercial.
- c) A new contract has been awarded – please see the link provided above.

**Question 12**

Not applicable – a new contract has been awarded.

**Question 13**

Where required, future opportunities would be published on Find a Tender.