

10 January 2023

Request under The Freedom Of Information (Scotland) Act 2002

Thank you for your Freedom of Information request dated 8 December 2022, in which you requested the following:

I am requesting information on all payments to external suppliers for purchases of goods and services between 2021-01-01 and 2021-12-31.

What is requested is a list of these payments, ideally in Microsoft Excel format, which contains as much of the following information for each payment as possible:

1. Supplier name
2. Amount paid, excluding VAT
3. Payment date (or some other relevant transaction date)
4. A unique invoice-id or a transaction-id number for each payment.
5. Some description of the nature of the expense

I am not asking you to do manual time-consuming compiling. I am only asking for an extract from your accounting software with as much of the above stated information as you can conveniently and reasonably provide.

We have considered your request, and can respond as follows:

Please find the information requested in points 1-3 above attached in an excel spreadsheet. In the spreadsheet we have not included payments of over £25,000. Per section 25 of the Freedom of Information (Scotland) Act 2002, this information is already available publicly and is routinely published on our website: [Our Annual Performance Report | VisitScotland.org](#)

With regard point 4. Of your request, we have redacted the unique ID numbers from the information provided. This is in line with Section 35(1)(a) of the Freedom of Information (Scotland) Act 2002, which covers prevention or detection of crime. This is due to the potential opportunity for this specific data to be used for fraudulent purposes.

With regard point 5. Of your request, this information is held on a separate system to the other information provided. Therefore, per your request to avoid manual compiling, we have not included this detail in our response. Should you wish us to share detail on how much staff time and any cost implications of providing this information, please let us know by reply.

We have also applied the public interest test in respect of the information exempted under sections 35 (1) (a) of FOISA. Please see below for the competing arguments identified within the public interest test exercise:

Why the public interest would be served by disclosing the information:

- Disclosure of the information may contribute to ensuring effective oversight of expenditure of public funds and that the public obtain value for money however, in our view, disclosure is unlikely to serve this purpose.

Why the public interest would be served by maintaining the exemption:

- Disclosure would not contribute to ensuring effective oversight of expenditure of public funds and that the public obtain value for money. Indeed by sharing this specific data, only held on VisitScotland's own systems, the release of information may enable attempts at fraudulent activity.
- A key consideration is whether disclosure would contribute to enforcement of the law including the prevention or detection of crime. Not disclosing the information would be in the public interest, given that the disclosure of the information would allow people to obtain information that could be used for fraudulent purposes.

Due to the outcome of this balancing exercise, we have judged that in all circumstances, the public interest in maintaining the exemption outweighs that of disclosure of the information.

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If you wish to request a review of your application under either the Freedom of Information (Scotland) Act 2002 or the Environmental Information (Scotland) Regulations 2004, your request should be submitted to us in writing, or another permanent format (for example e-mail or voice recording), and be received by us within 40 days of the date of this letter. Any request for a review should also set out, in as much detail as possible, the reasons why you are not satisfied with our response or the manner in which we have dealt with your application.

If you are still not satisfied with our handling of your application after we have responded to your request for a review, you have a right to apply to the Scottish Information Commissioner for a decision on whether we have dealt with your request in accordance with the Act.

The Scottish Information Commissioner may be contacted at:

Scottish Information Commissioner
Kinburn Castle
Doubledykes Road
St Andrews, Fife

KY16 9DS

Telephone: 01334 464610

Fax: 01334 464611

E-mail: enquiries@itspublicknowledge.info

You also have the right to appeal to the Court of Session in Scotland on a point of law concerning our response.

Yours sincerely,

VisitScotland