

DMPC Decision – PCD 1018

Title: Digital Interview Recording – Replacement of Suspect & Witness DVD Interview Recording in the MPS with a Secure Cloud Hosted Solution

Executive Summary:

This paper seeks approval to upgrade the current suspect and witness Digital Interview Recording (DIR) solution across 71 MPS sites for Fixed interview recording and 105 Mobile / Portable interview recording Kits.

‘Suspect & Witness’ Digital Interview Recording is a core police activity often providing key evidence in a criminal case. Currently all interviews in the MPS are recorded to DVD, adding significant time and cost during the post interview edit, transcription and sharing processes with minimal audit available to track DVD interview copies.

Following a successful procurement process that identified Axon.com as the Preferred Bidder, the DIR project looks to upgrade the existing DVD based suspect and witness DIR solution with a new secure Cloud Hosted solution enabling interviews to be recorded directly to secure Cloud Hosted servers. All post interview processing activity will take place in a single application, already used by MPS staff for the Axon, Body Worn Video solution enabling the MPS to leverage current Axon enterprise licences and digital storage while minimising business change and training.

Axon.com’s bid addressed all MPS technical requirements and was the most cost effective out of all responses. The secure cloud hosted solution costs more than the current DVD based solution but delivers significantly more functionality and efficiencies, reducing overall costs greatly while enabling staff to edit, redact, transcribe and share DIR recordings from their mobile device, a process currently achieved by numerous separate specialised editing units and staff.

Recommendation:

The Deputy Mayor for Policing and Crime is recommended to:

1. Approve the award of a 6 year contract (4 years initially plus two possible 1-year extensions) to the preferred bidder, Axon.com in relation to the delivery of the cloud hosted Digital Interview Recording solution. The duration of the contract covers Software as a Service (SaaS) for the six years.
2. Retrospectively approve the procurement strategy utilising the Digital Evidence and Asset Management and Software Solution (DEAMS) Framework. At the time the procurement was first initiated a budget had not been identified and MOPAC were not asked to approve a procurement strategy. However, budget has now been identified and as the value is in excess

of £500,000 MOPAC are asked to retrospectively approve the procurement strategy in accordance with section 4.13 of the MOPAC Scheme of Delegation.

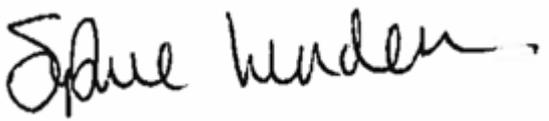
3. Approve the total Digital Interview Recording (DIR) Project at a cost of £10,900,000 (comprising £10,200,000 revenue and £700,000 capital):
 - Implementation project revenue costs of up to £1,968,000 (including risk provisioning of £868,000) fully funded from the DP Project Revenue budget and implementation capital of £700,000 fully funded from the MOPAC approved DP capital plan.
 - Ongoing service revenue costs of £1,710,000 p.a. after DVD cost savings over five years fully funded from the DP Revenue Budget and utilization of the DP innovation budget.
4. Note the recruitment of two new FTE Police roles (either x1 Band M and x1 Police officer or x1 Police Sergeant and x1 Police Constable) to the Digital Experience Team which is an opportunity cost of £800,000 to support the business over the full 6 years of the extended contract. Note – the two FTE posts will act to support MPS staff using the new DIR solution, throughout the contract length; providing asset management of mobile kit, day-to-day DIR advice / problem solving regarding the enhanced functionality re post interview processing, edit, redaction and transcription.

Deputy Mayor for Policing and Crime

I confirm I have considered whether or not I have any personal or prejudicial interest in this matter and take the proposed decision in compliance with the Code of Conduct. Any such interests are recorded below.

The above request has my approval.

Signature



Date

29/07/2021

PART I - NON-CONFIDENTIAL FACTS AND ADVICE TO THE DMPC

1. Introduction and background

- 1.1. This Business Justification Paper concerns the replacement of the current Suspect & Witness DVD based interview-recording solution, upgrading to a Commercial Off-The-Shelf, Software as a Service cloud hosted solution within UK Azure Servers; ensuring compliance with current and future legislation particularly with regard to MOPI (Management Of Police Information) and the GDPR (General Data Protection Regulation) legislation. This will involve the replacement of Custody & ABE (Achieving Best Evidence) fixed interview equipment and Mobile / Portable Recording equipment.
- 1.2. The proposed cloud hosted Digital Interview Recording (DIR) solution is more expensive year on year than the current DVD based DIR solution, however, the new solution removes DVD as a primary storage method in the MPS, significantly reducing associated manual handling time and costs connected to DVD editing, redaction and interview transcription, negating organisational and reputation risk.
- 1.3. The new contract delivers cashable savings of £0.1m per annum from estimated DVD purchasing costs but provides the MPS with substantial non-cashable benefits from vastly reduced manual handling costs totalling 65,000 hours of available police officer time annually. This equates to approximately £2.6m per annum from the elimination of post-interview manual handling processes. Similar manual processes could be vastly reduced from utilising the providers automated transcription software (transcription is currently achieved via officers typing interview content / summaries or trained typists completing this work).
- 1.4. The new fixed and mobile / portable DIR solution provides complete audit and greater levels of security for users with reduced operational risk for the individual and the Organisation. The new solution (hardware and software) is completely owned and supported by a single SaaS supplier.
- 1.5. The new solution ensures full compliance with the Management Of Police Information (MOPI) and the General Data Protection Regulation (GDPR) legislation within the context of the Police And Criminal Evidence act 1984 and the PACE Codes governing police recorded interviews.
- 1.6. Installation of the new cloud hosted DIR solution will require some parallel running with the existing DVD based solution to ensure a smooth roll out of the new solution with minimal interruption to interview recording facilities across the MPS estate.

2. Issues for consideration

- 2.1. The delivery of this technology is a necessary step the MPS needs to take to move towards the benefits of utilising Cloud hosted services:
 - Simpler integration and sharing of evidence
 - Full audit and vastly simplified working processes

- Ability to leverage existing contracts
 - A fully MOPI (Management Of Police Information) and GDPR (General Data Protection Regulation) compliant solution.
- 2.2. DVD manual handling presents the MPS with unnecessary and significant time and cost pressures. The ability to process, edit, transcribe and share interview content via a single auditable application provides the MPS with significant organizational and reputational protection while potentially freeing thousands of hours of officer's time annually.
- 2.3. The Crown Prosecution Service (CPS) already use an instance of Axon's Evidence.com software to view and review Body Worn Video evidence. In selecting Axon.com as the MPS's Preferred Bidder for Digital Interview Recording, the MPS can build on existing business processes with the CPS.

3. Financial Comments

- 3.1. The total DIR Secure Cloud Hosted solution's project budget is £10.9m (comprising £10.2m revenue and £0.7m capital) for a 4+1+1 contract (4-year initial contract with the option to extend for 1+1 years).
- 3.2. MPS Commercial have negotiated a contract extension with the current DVD based solution provider to ensure a smooth roll out of the new solution, aided by some parallel running between the old and new DIR solutions to ensure minimal interruption to MPS interview recording facilities
- 3.3. The cost for the project and contract extension is funded from the approved DP capital programme and DP revenue budgets – further detail is provided in the exempt part 2 DIR business justification paper.

4. Legal Comments

- 4.1. The Contract will be called off from Lot 2 (Body Worn Video Digital Evidence and Asset Management and Software Solution Framework, "DEAMS" managed by the East Midlands Police Strategic Commercial Unit (EMSCU).
- a. MOPAC is a contracting authority as defined in the Public Contracts Regulations 2015 (the Regulations). All awards of public contracts for goods and/or services valued at £181,302 or above must be procured in accordance with the Regulations. This report confirms the proposed contract exceeds this value. Accordingly, the Regulations will be engaged.
 - b. The report confirms that option 1 is compliant with the Regulations. The procurement has been conducted in compliance with the East Midlands Strategic Commercial Unit (EMSCU)-DPS Framework and therefore is also compliant with the Regulations.
 - c. Paragraph 4.13 of the MOPAC Scheme of Delegation and Consent provides the Deputy Mayor for Policing and Crime has delegated authority to approve all

requests to go out to tender for contracts valued at £500,000 or above
Populated upon decision.

- d. Upon approval by the MOPAC, the Director of Commercial Services may sign Contracts irrespective of value, provided they are not required to be sealed (under 7.26 of the MOPAC Scheme of Consent and Delegation)
- e. In accordance with PCD 778 “Amendments to MOPAC Financial Regulations, Contract Regulations and Scheme of Consent and Delegation, in relation to the execution of simple contracts and deeds, legal advice has been obtained which confirms that consideration will pass between the parties to form a binding contract. There is no legal requirement for the contract to be sealed (it is not a contract for land or any other form of transition which requires a document to be sealed by law and the risk is restricted to the scope of the contract does not require the additional limitation of a further six years. Therefore, there is no legal reason, which requires this contact to be sealed and it may, subject to the approval of MOPAC, be signed by the Director of Commercial Services.

- 4.2. Current services are provided by Sopra-Steria under a G Cloud Contract, which expires in September 2021. Commercial will continue to negotiate with Sopra-Steria exploring a number of procurement options to further extend the contract beyond Sept 2021, which include a Direct Award via the Health trust Europe or OJEU (Official Journal of the European Union). This was approved by MOPAC in the DP Consolidated Contracts paper in March 2021 (PCD 967). The cost of the extension will be tapered as the new solution is implemented.

5. Commercial Issues

- 5.1. The MPS / Axon.com contract value is commercially sensitive. Details are included in Part-2 of this document.
- 5.2. The MPS utilised the East Midland Strategic Commercial Unit (EMSCU) procurement route to nominate Axon.com as the DIR Preferred Bidder. A mini competition was held under the East Midlands Police Procurement Hub (EMSU)-DPS framework in compliance with the Public Contracts Regulations 2015.
- 5.3. MPS Commercial continue to negotiate a contract extension for the current DVD based solution.

6. GDPR and Data Privacy

- 6.1. The MPS is subject to the requirements and conditions placed on it as a 'State' body to comply with the European Convention of Human Rights and the Data Protection Act (DPA) 2018. Both legislative requirements place an obligation on the MPS to process personal data fairly and lawfully in order to safeguard the rights and freedoms of individuals.

- 6.2. Under Article 35 of the General Data Protection Regulation (GDPR) and Section 57 of the DPA 2018, Data Protection Impact Assessments (DPIA) become mandatory for organisations with technologies and processes that are likely to result in a high risk to the rights of the data subjects.
 - a. The new Secure Cloud Hosted DIR solution meets the responsibilities laid down by the DPIA and GDPR legislation.
- 6.3. The Information Assurance and Information Rights units within MPS have been and will be consulted at all stages to ensure the project meets its compliance requirements.
- 6.4. The project aims to remove DVD as a storage method from the MPS and in doing so, update the current Digital Interview Recording DVD based solution with a Secure Cloud Hosted solution, vastly improving and adding to post interview processing and editing activity. The new solution will be subject to its own DPIA assessment, which is in the process of being written. Additional GDPR considerations will be factored into the new DIR DPIA.

7. Equality Comments

- 7.1. The Met's Strategic, Diversity and Inclusion team are mandatory contacts prior to submission and were appropriately consulted. No equality or diversity issues have been identified. The Strategic Diversity and Inclusion Team agree that the impact from the proposed new solution will be minimal as MPS users already use Evidence.com to process Body Worn Video data. DIR data would be processed via the same application and the mechanisms to record the interview will change little with the exception of the removal of DVD's from the process.

8. Background/supporting papers

- 8.1. Report



MOPAC

MAYOR OF LONDON
OFFICE FOR POLICING AND CRIME

Digital Interview Recording – Replacement of Suspect & Witness DVD Interview Recording in the MPS with a Secure Cloud Hosted Solution

MOPAC Investment Advisory & Monitoring meeting - 09/07/2021

Report by James Higgins on behalf of the Chief of Corporate Services

Part 1 – This section of the report will be published by MOPAC. It is classified as OFFICIAL – PUBLIC

EXECUTIVE SUMMARY

This paper seeks funding to upgrade the current suspect and witness Digital Interview Recording (DIR) solution across 71 MPS sites for Fixed interview recording and 105 Mobile / Portable interview recording Kits.

‘Suspect & Witness’ Digital Interview Recording (DIR) is a core police activity often providing key evidence in a criminal case. Currently all interviews in the MPS are recorded to DVD, adding significant time and cost during the post interview edit, transcription and sharing processes with minimal audit available to track DVD interview copies.

Following a successful procurement process that identified Axon.com as the Preferred Bidder, the DIR project looks to upgrade the existing DVD based suspect and witness DIR solution with a new secure Cloud Hosted solution enabling interviews to be recorded directly to secure Cloud Hosted servers. All post interview processing activity will take place in a single application, already used by MPS staff for the Axon, Body Worn Video solution enabling the MPS to leverage current Axon enterprise licences and digital storage while minimising business change and training.

Axon.com’s bid addressed all MPS technical requirements and was the most cost effective out of all responses. The secure cloud hosted solution costs more than the current DVD based solution but delivers significantly more functionality and efficiencies, reducing overall costs greatly while enabling staff to edit, redact, transcribe and share DIR recordings from their mobile device, a process currently achieved by numerous separate specialised editing units and staff.

Recommendations

The Deputy Mayor for Policing and Crime, via the Investment Advisory and Monitoring meeting (IAM), is asked to:

1. **Approve** the total Digital Interview Recording (DIR) Project budget of £10.9m (comprising £10.2m revenue and £0.7m capital).¹
2. **Approve** and award the DIR 4+1+1 year contract to the preferred bidder, Axon.com in relation to the delivery of the cloud hosted Digital Interview Recording solution. The duration of the contract covers Software as a Service (SaaS) for the six years (a 4-year initial term (including 12 months implementation within year one) plus a two year (1+1) optional extension.
3. **Approve** implementation project revenue costs of up to £2.0m (including risk provisioning of £0.9m) fully funded from the DP Project Revenue budget and implementation capital of £0.7m fully funded from the MOPAC approved DP capital plan.
4. **Approve** service BAU revenue costs of £7.0m after DVD cost savings over five years (2021/22 £1.5m, 2022/23 £1.4m, 2023/24 £1.6m, 2024/25 £1.7m, 2025/26 £0.8m fully funded from the DP Revenue Budget and utilization of the DP innovation budget. Note – the DIR total project budget over the full contract term of 4+1+1 (6 years) is £10.9m (comprising £10.2m revenue and £0.7m capital).
5. **Approve** the recruitment of two new FTE Police roles (either x1 Band M and x1 Police officer or x1 Police Sergeant and x1 Police Constable) to the Digital Experience Team which is an opportunity Cost of £0.8m to support of the business over the full 6 years of the extended contract. Note – the two FTE posts will act to support MPS staff using the new DIR solution, throughout the contract length; providing asset management of mobile kit, day-to-day DIR advice / problem solving regarding the enhanced functionality re post interview processing, edit, redaction and transcription.
6. **Retrospective approval** for the procurement strategy utilising the DEAMS Framework. At the time the procurement was first initiated a budget had not been identified and MOPAC were not asked to approve a procurement strategy. However, budget has now been identified and as the value is in excess of £500,000 MOPAC are asked to retrospectively approve the procurement strategy in accordance with section 4.13 of the MOPAC Scheme of Delegation.

Time sensitivity

7. A decision is required from the Deputy Mayor by 14/07/21 or soon after. This is because the current DIR DVD based provider's contract with Sopra-Steria requires extension due to the requirement for some parallel running capability to enable the new secure hosted server solution to be fully installed via a phased roll out. Sopra-Steria's contract was due to cease on 31/03/21 however, a limited contract extension is in place with further contract negotiations taking place throughout 2021.
8. The Procurement process identified Axon.com as the Preferred Bidder.

Non-confidential facts and advice to the Deputy Mayor for Policing and Crime

Introduction and background

9. This Business Justification Paper concerns the replacement of the current Suspect & Witness DVD based interview-recording solution, upgrading to a Commercial Off-The-Shelf, Software as a Service cloud hosted solution within UK Azure Servers; ensuring compliance with current and future legislation particularly with regard to MOPI (Management Of Police Information) and the GDPR (General Data Protection Regulation) legislation. This will involve the replacement of Custody & ABE (Achieving Best Evidence) fixed interview equipment and Mobile / Portable Recording equipment.
10. The proposed cloud hosted DIR solution is more expensive year on year than the current DVD based DIR solution however, the new solution removes DVD as a primary storage method in the MPS, significantly reducing associated manual handling time and costs connected to DVD editing, redaction and interview transcription, negating organisational and reputation risk.
11. The new contract delivers narrow cashable savings of £0.1m per annum from estimated DVD purchasing costs but provides the MPS with substantial non-cashable benefits from vastly reduced manual handling costs totalling 0.065m hours of available police time annually. If that time cost is viewed as a saving, potentially £2.6m in savings per annum from the elimination of post-interview manual handling processes. Similar manual processes could be vastly reduced from utilising the providers automated transcription software (transcription is currently achieved via officers typing interview content / summaries or trained typists completing this work).
12. The new fixed and mobile / portable DIR solution provides complete audit and greater levels of security for users with reduced operational risk for the individual and the Organisation. The new solution (hardware and software) is completely owned and supported by a single SaaS supplier.
13. The new solution ensures full compliance with the Management Of Police Information (MOPI) and the General Data Protection Regulation (GDPR) legislation within the context of the Police And Criminal Evidence act 1984 and the PACE Codes governing police recorded interviews.
14. Installation of the new secure cloud hosted DIR solution will require some parallel running with the existing DVD based solution to ensure a smooth roll out of the new solution with minimal interruption to interview recording facilities across the MPS estate.

Issues for consideration

15. The delivery of this technology is a necessary step the MPS needs to take to move towards the benefits of utilising Cloud hosted services:
 - Simpler integration and sharing of evidence
 - Full audit and vastly simplified working processes
 - Ability to leverage existing contracts
 - A fully MOPI (Management Of Police Information) and GDPR (General Data Protection Regulation) compliant solution

16. DVD manual handling presents the MPS with unnecessary and significant time and cost pressures. The ability to process, edit, transcribe and share interview content via a single auditable application provides the MPS with significant organizational and reputational protection while potentially freeing thousands of hours of officer's time annually.

17. The Crown Prosecution Service (CPS) already use an instance of Axon's Evidence.com software to view and review Body Worn Video evidence. In selecting Axon.com as the MPS's Preferred Bidder for Digital Interview Recording, the MPS can build on existing business processes with the CPS.

Contributes to the MOPAC Police & Crime Plan 2017-2021²

18. The introduction of the DIR Secure Cloud Hosted solution supports MOPAC's Police & Crime Plan 2017-2021 in realizing efficiencies from reduced manual handling while supporting integration and efficient sharing of evidence between the MPS and the Crown Prosecution Service.

Financial, Commercial and Procurement Comments

19. The total DIR Secure Cloud Hosted solution's project budget is £10.9m (comprising £10.2m revenue and £0.7m capital) for a 4+1+1 contract (4-year initial contract with the option to extend for 1+1 years).

20. The MPS / Axon.com contract value is commercially sensitive. Details are included in Part-2 of this document.

21. The MPS utilised the East Midland Strategic Commercial Unit (EMSCU) procurement route to nominate Axon.com as the DIR Preferred Bidder.

22. The DIR Business Justification Paper details the project funding and agreed funding route.

23. MPS Commercial have negotiated a contract extension with the current DVD based solution provider to ensure a smooth roll out of the new solution, aided by some parallel running between the old and new DIR solutions to ensure minimal interruption to MPS interview recording facilities.

² [Police and crime plan: a safer city for all Londoners | London City Hall](#)

Legal Comments

24. The Contract will be called off from Lot 2 (Body Worn Video Digital Evidence and Asset Management and Software Solution Framework, "DEAMS" managed by the East Midlands Police Strategic Commercial Unit (EMSCU).
- a. MOPAC is a contracting authority as defined in the Public Contracts Regulations 2015 (the Regulations). All awards of public contracts for goods and/or services valued at £181,302 or above must be procured in accordance with the Regulations. This report confirms the proposed contract exceeds this value. Accordingly, the Regulations will be engaged.
 - b. Section 5.3 of the report confirms that option 1 is compliant with the Regulations. The procurement has been conducted in compliance with the East Midlands Strategic Commercial Unit (EMSCU)-DPS Framework and therefore is also compliant with the Regulations.
 - c. Paragraph 4.13 of the MOPAC Scheme of Delegation and Consent provides the Deputy Mayor for Policing and Crime has delegated authority to approve all requests to go out to tender for contracts valued at £500,000 or above Populated upon decision.
 - d. Upon approval by the MOPAC, the Director of Commercial Services may sign Contracts irrespective of value, provided they are not required to be sealed (under 7.26 of the MOPAC Scheme of Consent and Delegation)
 - e. In accordance with PCD 778 "Amendments to MOPAC Financial Regulations, Contract Regulations and Scheme of Consent and Delegation, in relation to the execution of simple contracts and deeds, legal advice has been obtained which confirms that consideration will pass between the parties to form a binding contract. There is no legal requirement for the contract to be sealed (it is not a contract for land or any other form of transition which requires a document to be sealed by law and the risk is restricted to the scope of the contract does not require the additional limitation of a further six years. Therefore, there is no legal reason, which requires this contact to be sealed and it may, subject to the approval of MOPAC, be signed by the Director of Commercial Services.
25. Current services are provided by Sopra-Steria under a G Cloud Contract, which expires in September 2021. Commercial will continue to negotiate with Sopra-Steria exploring a number of procurement options to further extend the contract beyond Sept 2021, which include a Direct Award via the Health trust Europe or OJEU (Official Journal of the European Union). This was approved by MOPAC in the DP Consolidated Contracts paper in March 2021. The cost of the extension will be tapered as the new solution is implemented. MOPAC approved the extension of current services in March 2021 (Consolidated Renewals Paper 2021)

Equality Comments

26. The Met's Strategic, Diversity and Inclusion team are mandatory contacts prior to submission and were appropriately consulted. No equality or diversity

issues have been identified. The Strategic Diversity and Inclusion Team agree that the impact from the proposed new solution will be minimal as MPS users already use Evidence.com to process Body Worn Video data. DIR data would be processed via the same application and the mechanisms to record the interview will change little with the exception of the removal of DVD's from the process.

Privacy Comments

27. The MPS is subject to the requirements and conditions placed on it as a 'State' body to comply with the European Convention of Human Rights and the Data Protection Act (DPA) 2018. Both legislative requirements place an obligation on the MPS to process personal data fairly and lawfully in order to safeguard the rights and freedoms of individuals.
28. Under Article 35 of the General Data Protection Regulation (GDPR) and Section 57 of the DPA 2018, Data Protection Impact Assessments (DPIA) become mandatory for organisations with technologies and processes that are likely to result in a high risk to the rights of the data subjects.
 - a. The new Secure Cloud Hosted DIR solution meets the responsibilities laid down by the DPIA and GDPR legislation.
29. The Information Assurance and Information Rights units within MPS have been and will be consulted at all stages to ensure the project meets its compliance requirements.
30. The project aims to remove DVD as a storage method from the MPS and in doing so, update the current Digital Interview Recording DVD based solution with a Secure Cloud Hosted solution, vastly improving and adding to post interview processing and editing activity. The new solution will be subject to its own DPIA assessment, which is in the process of being written. Additional GDPR considerations will be factored into the new DIR DPIA.

Real Estate Implications

31. Changing the storage end-point away from DVD and over to secure server is at the heart of this project and will require data cable runs from the interview rooms to the Technical Equipment Rooms located within each MPS police station. Site surveys including asbestos surveys will take place at all sites to ensure that all new hardware, required for the new solution can be installed safely.
32. The project will work with the MPS Property Services Directorate (PSD) to ensure all works carried out and undertaken in support of the project are completed in a Health & Safety compliant manner. Costs relating to this work can be found in the restricted section of the report'.

Environmental Implications

33. Obsolete electrical equipment / existing DVD based DIR hardware will be decommissioned and disposed of securely by the MPS's currently contracted third party DXC and the disposal routes will take into consideration the waste hierarchy in accordance with The Waste Electric and Electronic Equipment (WEEE) Regulations 2013 and the waste duty of care imposed under section 34 of the Environmental Protection Act 1990.
34. Note – MPS Commercial have already spoken with the GLA³ with regard to the environmental impact of this project and associated decommissioning activities.

Background/supporting papers

35. None other than the DIR Business Justification Paper itself.

Report author: James Higgins – Project Manager DP Solution Delivery – James.higgins3@met.police.uk

Part 2 – This section refers to the details of the Part 2 business case which is NOT SUITABLE for MOPAC Publication.

The Government Security Classification marking for Part 2 is: OFFICIAL-SENSITIVE [COMMERCIAL].

Part 2 of the Digital Interview Recording BJP – Replacement of Suspect & Witness DVD Interview Recording in the MPS with a Secure Cloud Hosted Solution is exempt from publication for the following reasons:

- Exempt under Article 2(2)(a) of the Elected Local Policing Bodies (Specified Information) Order 2011 (Data Protection Section 43 – Commercial Interests).
- The relevant sections under the FOIA that would exempt this information from disclosure, under the following section:
 - Commercial Interest Section 43

The paper will cease to be exempt until for a minimum of 6 years from the date of this paper 18/05/2021, according to the MPS Records Management Policy.

³ MPS Commercial Peter Thurley spoke with the GLA's Lucie Neville