

# Report on Investigation: Grants for the Arts Award for the 2014 Soho Literary Festival

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Attachments Appendix A – Call log to Customer Services

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# 1. Executive summary

1.1 [REDACTED]  
[REDACTED], contacted Arts Council England (ACE) around April/May 2014 to raise concerns he had regarding a grant (URN: [REDACTED]) we awarded to provide funding to cover part of the costs of the 2014 Soho Literary Festival. His concerns related to the accuracy of the information provided in the application submitted by [REDACTED] and whether or not the festival was eligible for funding.

1.2 ACE has investigated the concerns raised by [REDACTED]. The objective of the investigation included:

- determining whether or not the application was eligible for funding,
- determining whether or not the costs ACE were being asked to fund were eligible for funding, and
- determining whether or not any aspect of the application submitted to ACE was inappropriately completed.

In addition to this, the investigation also considered all aspects of how we dealt with this application and the concerns raised by [REDACTED]. The report also identifies a number of improvements in our processes and controls systems that should be considered. It should be noted that [REDACTED] has taken an active role with the investigation and provided information requested promptly and openly.

1.3 The investigation has concluded that there was no misuse of Arts Council funds, specifically:

- The application submitted by [REDACTED] to ACE is eligible for funding on the grounds that the Soho Literary Festival 2014 is a 'self-contained arts project'.
- The costs ACE were being asked to fund are eligible for funding.
- The application was inaccurately completed because it did not identify Oldie Publications Ltd as an alternative name or other legal name of the applicant and claimed the applicant was a company limited by guarantee. However, we have concluded that there was not an attempt to mislead Arts Council England.

1.4 In relation to the advice ACE provided to the applicant and how we processed the application the investigation found:

- Customer Services did not provide any inaccurate advice to [REDACTED] prior to him submitting his application.
- Grant Management correctly processed the application based on the content of the application submitted. It is only when the evidence supplied during the the course of this investigation is taken into consideration that there are questions over the eligibility of the application.
- Customer Services should have classified the concerns raised by [REDACTED] as an allegation of a possible misuse of funds rather than a third-party complaint. Customer Services have since taken action that should reduce the likelihood of this type of misclassification occurring in future. This includes introducing a new process for third parties to raise a concern (published on our website) and a protocol whereby the Director of Finance and the Senior Manager QA and Risk Management will be consulted on concerns reported by third parties.

1.5 The investigation identified a number of areas where ACE's published guidance was considered not sufficiently clear. This could make it difficult for potential applicants to decide if they were eligible for a grant and what expenditure could be funded. Specific areas where our published guidance could be made clearer include:

- Why ACE places restrictions on commercial (profit-making) organisations.
- What ACE defines or considers a 'self-contained arts project' to be.
- The circumstances under which we will fund ongoing overheads and salary costs, including how the applicant should deal with these in their applications.

## 2. Background

- 2.1 On 27 November 2013 [REDACTED] submitted an application to the Grants for the arts under £15,000 programme for the 2014 Soho Literary Festival. The Arts Council awarded the 2014 Soho Literary Festival a grant of £15,000 on 8 January 2014. The festival took place between 24 and 28 September 2014.
- 2.2 [REDACTED]  
[REDACTED], met with Nick McDowell, Director, International and London, in early May 2014 in order to raise concerns over the grant we had awarded as a result of an application from the 2014 Soho Literary Festival. On 12 May 2014 [REDACTED] wrote to Nick McDowell to put his concerns in writing as advised by Mr McDowell. [REDACTED] concerns related to what he believed to be a misuse of our funds.
- 2.3 Mr McDowell passed [REDACTED] letter detailing his concerns to Customer Services, who reviewed the concerns raised and decided to treat it as a third-party complaint. This meant that the complaint would not be investigated as it involved the actions of a third-party organisation. They emailed [REDACTED] on 29 May 2014 to advise him of this, but did advise that his concerns would be passed to the relevant department. However, no record was retained of the complaint being passed to anyone else inside ACE and no further action was taken to investigate the concerns.
- 2.4 A journalist from the London Evening Standard contacted our Media Relations Officer on 2 June 2014 to enquire into the concerns raised by [REDACTED]. This enquiry led to [REDACTED] concerns being reclassified and resulted in the decision to investigate [REDACTED] concerns.
- 2.5 The concerns raised by [REDACTED] relate to what he believes is a misuse of our funding. He specifically raises concerns over the accuracy of the information submitted by [REDACTED] in his application to Arts Council England. In his letter, he raises the following concerns:
1. Under **Organisation details** the application (pp1, 2, 10) describes Soho Literary Festival as a company limited by guarantee. There is no such company. The address, company number etc are those of The Oldie, a registered company which last year made a profit of £300,000.
  2. Support in kind (p 12) this details the contribution of [REDACTED] and the assistant editor, office facilit [REDACTED] **No mention is made of the fact that The Oldie has employed [REDACTED] since 2012 with a salary of**

**£25,000 in a dual role as editorial assistant and organiser of the festival, a role she took over from the previous organiser [REDACTED].**

The application states (p 5)

- We need another member of staff to help with the marketing of the festival.
- New marketing executive salary of £14,590 plus NIC (p 12).

No reason is given for this new appointment nor any details of what the job will involve but following queries from me [REDACTED] ..... admitted that no new appointment was actually being sought. **“She [REDACTED] was the new marketing executive at the time of the application” (Email to R.I.)**

### 3. Investigation approach

3.1 The main objective of the investigation was to determine whether the 2014 Soho Literary Festival grant application submitted by [REDACTED] on behalf of Oldie Publications/Soho Literary Festival was eligible for funding. In order to form an opinion on this, the investigation sought to answer the following questions:

- Was the applicant eligible to apply for Grants for the arts funding?
- Were the costs we were being asked to fund eligible?
- Was the application submitted by [REDACTED] on behalf of Oldie Publications/Soho Literary Festival misleading?

3.2 In addition to addressing the points above, the investigation also considered:

- How Customer Services handled [REDACTED] queries prior to submitting his application (i.e. did we give advice that is inconsistent with our published guidance?).
- How we processed the application (i.e. did we allow an ineligible application to be processed?).
- How we dealt with the concerns raised by [REDACTED] in the first instance.

3.3 The scope of the investigation involved:

- Reviewing documentation relating to the grant held on Arena, our grants management system.
- Reviewing recordings of calls made to Customer Services relating to the Soho Literary Festival.
- Interviewing [REDACTED] (19 June 2014) and [REDACTED] (25 June 2014).
- Reviewing evidence obtained during the investigation.
- Reviewing our published guidance relating to Grants for the arts under £15,000 awards.
- Consulting with Arts Council England employees over the interpretation of our published guidance.
- Reviewing the project activity report (received at the end of October 2014 shortly after the festival, which took place in September).
- Follow-up meetings with [REDACTED] (6 November and 8 December 2014) to seek clarification on a number of points.
- Requesting and reviewing invoices, bank statements etc to validate the final income and expenditure account for the project contained in the activity report.

## 4. Eligibility of the application

- 4.1 Determining the eligibility of the application for funding involved assessing the information contained in the application submitted along with any further information obtained during the investigation against the criteria specified in Arts Council England's published guidance.
- 4.2 Our published guidance 'Grants for the arts, How to apply for £15,000 and under' details who can and who cannot apply for funding. The section of guidance relevant to this investigation clearly states that 'Organisations that share out profits to members or shareholders, unless the activity you are applying for is a self-contained arts project and has a clear benefit to the public' are not eligible.

### ***Does the applicant share out profits to members or shareholders?***

- 4.3 The application was submitted in the name of Soho Literary Festival and the grant was awarded to Soho Literary Festival. The sections of the application form that require applicants to give alternative or legal names (if any) of the applicants were left blank. However, there is clear reference to the link with The Oldie on pages 5 'All three festivals have been organised, staffed and underwritten by The Oldie magazine', 6 'The Soho Literary Festival is produced by The Oldie...' and 12 'Without The Oldie magazine, the festival could not possibly happen' of the application form. In addition it is the company number for Oldie Publications Ltd that is given on the application form.
- 4.4 A review of the evidence obtained during the investigation has established the following facts:
- Soho Literary Festival was established by Oldie Publications Ltd in 2011 for the purposes of promoting The Oldie magazine.
  - Oldie Publications Ltd has underwritten and delivered the Soho Literature Festival since its inception until the 2014 festival.
  - Oldie Publications Ltd is a profit-making organisation and does share out profits to shareholders.
  - The Soho Literary Festival Limited (a company limited by guarantee) was incorporated on 18 November 2010 and was dissolved on 15 May 2012 but does appear to have been used to promote or manage the Soho Literary Festival in 2011 or 2012.

Discussions with members of staff responsible for assessing the application confirm that they were aware of the relationship with Oldie Publications Ltd when the assessment was carried out. This was confirmed when the bank mandate was received in the name Oldie Publications Ltd – Soho Literary Festival.

Based on these facts, it has been concluded that;

The application is inaccurate because it does not give Oldie Publications Ltd as the alternative and legal name of the applicant and it claims the applicant is a company limited by guarantee when it is actually limited by shares. However, we do not believe there was an attempt to mislead Arts Council England due to the clear references to The Oldie in the application form and the correct company number being supplied.

The applicant is Oldie Publications which, as an organisation that shares out profits to members or shareholders, would be ineligible unless the activity (the 2014 Soho Literary Festival) for which funding is being applied is a 'self-contained arts project' that 'has a clear benefit to the public'.

***Is the festival a 'self-contained arts project'?***

- 4.5 It is difficult to determine whether the 2014 festival qualifies as a 'self-contained arts project'. Arts Council England does not give any further guidance on how we interpret a 'self-contained arts project'. For this investigation we have interpreted 'self-contained arts project' to mean an arts project that can be evidenced as being separate from the host commercial company (i.e. Oldie Publications Limited) with a clear audit trail of the income and expenditure relating to the project.
- 4.6 As part of the investigation we were provided with copies of board minutes for Oldie Publications Ltd and copies of various communications (letters and emails) between [REDACTED] and [REDACTED]. We have also reviewed the activity report and the invoices, bank statements and other vouchers that support the final income and expenditure account for the project. After reviewing this evidence, the following relevant facts have been established:
- Soho Literary Festival was established by Oldie Publications Ltd in 2011 for the purposes of promoting The Oldie magazine.
  - Oldie Publications Ltd has underwritten and delivered the Soho Literature Festival since its inception until the 2014 festival.

- Separate internal ledger accounts are maintained, along with a separate bank account for the festival.
- The costs of staff employed by Oldie Publications Ltd were charged to the project when they were working on the festival, both when it was underwritten by Oldie Publications Ltd (up to the 2013 festival) and for the 2014 festival which received a grant from us.
- Regular updates are provided at the board meetings of Oldie Publications Ltd. This includes updates on the festival and its finances, with the gross profitability being considered.
- The festival is one of a number of non-publishing activities undertaken by Oldie Publications Ltd that appear to have the intended purpose of, at least in part, promoting The Oldie magazine.

After reviewing the evidence provided, we have concluded on balance the 2014 Soho Literary Festival can be seen as a 'self-contained arts project'. The key pieces of evidence we have relied on in coming to this conclusion are the existence of a separate bank account and separate ledger accounts within Oldie Publications Ltd.

***Does the festival provide clear benefit to the public?***

- 4.7 We are confident that the 2014 Soho Literary Festival did provide 'clear benefit to the public' because it promoted a significant number of literary events which were well publicised and then took place.
- 4.8 We have also seen evidence to prove that the 2014 Soho Literary Festival did or was intended to provide a benefit to Oldie Publications Ltd. The evidence for this included:
- The 2014 festival was discussed at the Oldie Publications Ltd board meetings alongside all other profit-making activities undertaken by Oldie Publications Ltd.
  - The festival was initially established for the purposes of promoting The Oldie magazine and is one of a number of non-publishing activities undertaken by Oldie Publications for that purpose. There is no evidence that this objective ceased in 2014.
  - The festival was managed and administered by staff employed by Oldie Publications.

We have therefore concluded that the 2014 Soho Literary Festival resulted in both a public benefit and benefit to Oldie Publications Ltd. We do not directly address mixed

benefit situations like this in our Grants for the arts guidance. It is instead covered in the National Lottery policy directions.

Issued under section 26(1) of the National Lottery etc Act 1993, Arts Council England is required to take policy directions issued by the Secretary of State into account when deciding to whom it distributes lottery money, for what purpose, and under what conditions. The relevant policy direction is H – ‘The need to ensure that money is distributed for projects which promote public value and which are not intended primarily for private gain’.

We have found it difficult to find conclusive evidence as to whether or not the 2014 Soho Literary Festival was a project intended to primarily deliver private gain. While it appears that the festival in previous years was primarily for private gain i.e. to promote The Oldie magazine, as referenced in the board minutes we have seen, it is our judgement that the ambition for the 2014 festival was to provide a mainly public benefit project.

This intention is evidenced in the employment of Stage Text (who provide captioning and live speech to text services), the payment of artists’ expenses and holding ticket prices to 2013 levels, which would not have been possible without receipt of public subsidy. Invoices and ticketing information have been provided to support this.

### ***Conclusion***

- 4.9 Based on an assessment of all the information available, including evidence obtained as part of this investigation which was not available to the application assessor, we have concluded that the application was eligible for funding.

## 5. Eligibility of costs

5.1 Our published guidance 'Grants for the arts, How to apply for £15,000 and under' contains a section that sets out what applicants cannot apply for. In this section of the guidance there are two areas that are relevant to this investigation.

5.2 Our guidance states: 'You cannot apply for the following activities:

- General running costs and ongoing overheads. These include those relating to salaries, equipment or buildings (such as rent, insurance and maintenance costs). You can apply for some time-limited overheads that are directly related to delivering your activity (such as cost for additional staff time, venue hire or utilities).
- Costs that are already paid for by other income including your own funds or any other funding.'

5.3 This guidance is supplemented with further guidance contained in 'Information sheet: Repeat activities, ongoing overheads and salaries'. This guidance reiterates the guidance above, but then goes on to state:

'There are, however, some ongoing overhead costs that you can apply for. These are as follows:

- Extra time-limited overhead and administrative costs that are directly related to the activity you are asking us to support. For example, payments to staff, phone bills, postage, insurance and rental costs for additional space.
- A contribution to your ongoing overheads where these are not already funded by Arts Council England or other funding sources. The amount you apply for must relate directly to the amount of time spent on the activity you are asking us to support and you will need to show us how you have worked this out.'

5.4 In determining whether the project costs Arts Council England was being asked to part-fund are eligible, we have considered what the applicant stated the funds would be used for in their application, what the evidence obtained during this investigation indicated they would be used for and what they were actually used for. In particular we have reviewed the final income and expenditure account for the project.

5.5 In considering the question of what costs are eligible for any project we fund, it is important to remember that our grant is not being used to fund specific identified items of expenditure. We fund a proportion of the total costs of a project – in the case of the 2014 Soho Literary Festival about 45%. The majority of the items in

the final income and expenditure account are clearly appropriate costs where we have no concerns as to their eligibility.

- 5.6 The eligibility of the recharge of staff costs from Oldie Publications Ltd was doubted. [REDACTED] specifically refers to these staff costs in his complaint.
- 5.7 In his application, [REDACTED] states 'we need another member of staff to help with the marketing of the festival' and includes £14,590 plus NIC (approximately £16,000). In the breakdown of expenditure [REDACTED] states in his letter to Nick McDowell that when he queried this new appointment with [REDACTED], [REDACTED] 'admitted that no new appointment was actually being sought' and that the new marketing executive was in fact an existing employee already employed to organise the festival. However, we are aware from correspondence supplied in the course of this investigation that [REDACTED] first discussed hiring another member of staff with Arts Council England prior to submitting the application and had an internal meeting on February 10 2014 at which it was decided to review such recruitment at the end of March.
- 5.8 [REDACTED] provided an email sent by [REDACTED] (dated 10 April 2014) that clearly stated:
- 'The application, which was sent to the board last week, clearly states that the grant will allow us to pay for
- a new marketing executive salary of £14,590 plus NIC – basically [REDACTED]
- 5.9 The final income and expenditure account for the 2014 festival includes a number of recharges for (a proportion) of the costs of a number of Oldie Publications staff.
- 5.10 There is evidence that Oldie Publications was not certain whether they intended to employ a specific new person to market the festival or recharge existing staff when they made the grant application. It also appears that whether it was to be a specifically employed person or existing staff was subject to possible change right up to the start of the 2014 festival.
- 5.11 However, either the costs of a specifically employed person or appropriately apportioned costs of existing members of staff are eligible costs for a project funded from Grants for the arts.

## ***Conclusion***

- 5.12 We have reviewed the apportionment calculations provided by Oldie Publications Ltd in relation to existing staff members, where a proportion of their time has been charged to the project, and are content they are reasonable and therefore eligible costs that can be charged to the project.
- 5.13 It is worth recording here that it is easy to be confused in relation to eligible costs and the specific circumstances of the 2014 Soho Literary Festival. The Soho Literary Festival is a festival that has taken place each year from 2011 and until 2014 Oldie Publications did not need to consider the question of eligible costs and whether they should be met in part by public subsidy from Arts Council England.
- 5.14 This is particularly so for an activity like the annual Soho Literary Festival that has existed for a number of years wholly in the commercial world and then seeks to be part-funded from public subsidy. This is an unusual set of circumstances that is likely to only apply in a small minority of applications we receive.
- 5.15 Our Grants for the arts guidance clearly states that we will not fund ongoing overheads, including salaries, or costs that are already paid for by other funding. Meanwhile, the guidance in the 'Information sheet: Repeat activities, ongoing overheads and salaries' does allow in some circumstances for ongoing overhead costs to be funded. Our guidance and information sheet are silent on the case of an existing project (like the Soho Literary Festival) that is moving from a commercial environment to a publically subsidised one.
- 5.16 It is recommended we consider whether our guidance should be enhanced to cover existing projects that are moving from a fully commercial to part-subsidised model.

## 6. Review of our processes

6.1 As part of the investigation, we have also reviewed our processes in order to identify if there are any weaknesses in our processes that require addressing. This part of the investigation looked at the following points:

- how Customer Services dealt with [REDACTED] enquiries relating to the application,
- how we dealt with changes to the grant budget following the award of the grant, and
- how we dealt with concerns initially raised by [REDACTED].

### ***How Customer Services dealt with [REDACTED] queries***

6.2 Arts Council England records all calls received by Customer Services for the purpose of monitoring and training and development. Calls are logged against the number of the caller. As part of the investigation we had copies of recorded calls received from [REDACTED] mobile number and from the contact number for Oldie Publications. See Appendix A for a call log.

6.3 We listened to all the recorded calls and identified no instances where Customer Services gave advice to [REDACTED] that was not consistent with our published guidance.

### ***How we dealt with the requests to change the budget***

6.4 [REDACTED] contacted Customer Services on 14 April 2014 to request changes to 'our activity report'. The requested changes were to how the activity would be delivered and hence the funds used. The requested changes included no longer recruiting a new marketing executive, instead increasing the duties (albeit time-limited) of the existing Soho Literary Festival Coordinator and Editorial Administrator, and a greater role for the PR Company. [REDACTED] email set out:

'We now feel it is better to increase her duties (albeit time-limited), improve the website and increase the PR company's role than to hire an additional marketing person whose salary will not be affordable in the event we do not get a grant next year.

'This will also save us the extra costs of office space, recruitment and training, and there will not be any redundancy issues. In the event you do not give us a grant next year, [REDACTED] will be kept on by the magazine.

‘Our application budgeted £16,458 (£14,590 plus NIC) to cover this, and we will be able to achieve all our marketing goals within this figure.’

- 6.5 Customer Services identified this change as a change of budget and treated it as such. They advised that they did not see there being any issues with the requested change.
- 6.6 [REDACTED] called Customer Services again on 15 April 2014 to receive confirmation that his requested budget change was acceptable. Customer Services advised they had forwarded his email on to Grant Management to be reviewed and that they would contact him if there was a problem. Customer Services then forwarded the email on to Grant Management.
- 6.7 Grant Management reviewed the change and advised that ‘all seems fine, just making some adjustments in expenditure, but same overall aims and no change to the project’. This was conveyed to [REDACTED] by email on 17 April 2014, stating that the changes were ‘absolutely fine’ and he states that he placed reliance on this communication.
- 6.8 Having reviewed how the requested change was dealt with by Customer Services and Grant Management, we are satisfied that it was dealt with appropriately.

***How we dealt with the concerns raised by [REDACTED]***

- 6.9 It is our understanding that [REDACTED], [REDACTED], approached Alan Davey, Chief Executive on behalf of [REDACTED] in order to arrange for someone to contact him so that he could raise concerns that he had relating to the grant given to the Soho Literary Festival. Mr Davey passed this to Nick McDowell, Director, International and London.
- 6.10 Mr McDowell had a meeting with [REDACTED] on or around 6 May 2014. At this meeting Mr McDowell advised [REDACTED] to put his concerns in writing. [REDACTED] wrote to Mr McDowell on 12 May 2014 setting out the concerns he had in relation to the Grants for the arts application submitted by [REDACTED]. On receipt of [REDACTED]’ letter, Mr McDowell forwarded it to Liam Waterhouse, Administrator, and Customer Services. In his forwarding email he identifies that the complaint relates to ‘misuse of our funds’, but goes on to advise that he detects there is some ‘internal disagreement at The Oldie’. He then suggests that ‘our position should be neutral, unless we have any clear indication that our funds are being misused’.

- 6.11 Customer Services reviewed [REDACTED]' letter and made the decision to treat it as a third-party complaint. They wrote to [REDACTED] on 29 May 2014 to advise him that it 'cannot be handled using the Arts Council's published complaints procedure, as it refers to the actions of an external organisation'. The response goes on to advise that 'your comments have been passed on to the relevant department'. We were advised that it was passed to a Relationship Manager.
- 6.12 No further action was taken in relation to [REDACTED]' complaint until another journalist from London Evening Standard contacted Media Relations. This led to the complaint being reassessed and this investigation.
- 6.13 It is our opinion that we should have dealt with [REDACTED]' concerns as being about a possible misuse of funds which would have then been flagged for investigation rather than as a third-party complaint which we do not investigate.

## 7. Lessons for the future

- 7.1 As a result of completing this investigation, there are a few areas where consideration should be given as to whether our grant-making processes and controls need to be strengthened.

### ***Clarity of published guidance***

- 7.2 In completing this investigation, one of the difficulties we encountered was in determining whether the application for the Soho Literary Festival was eligible and whether the costs we were being asked to fund were eligible for funding. We found that there are a number of areas where our published guidance could be made clearer.
- 7.3 Specific areas where we believe that further consideration needs to be given to our published guidance include: (i) clarity over why we restrict the circumstances in which commercial organisations can legitimately apply; (ii) clarity over what we mean by ‘self-contained’ in relation to an arts project; (iii) more explicit guidance on when ongoing overheads are eligible.
- 7.4 For the first point, we believe that giving explicit guidance on why we place restrictions on commercial organisations would make it easier for potential applicants to determine whether or not they are eligible to apply for funding. This in turn should reduce the risk of ineligible applications being submitted. It would also make it easier to deal with any grant awarded where we subsequently find the applicant was ineligible.
- 7.5 The other area where further guidance would be beneficial relates to what we define as a ‘self-contained’ arts project. For a commercial organisation to be eligible to apply for a grant, ‘the activity you are applying for is self-contained arts project’. We offer no further guidance on how we interpret a ‘self-contained’ arts project. This leaves the definition open to interpretation and puts the onus on Arts Council England to make the judgment.
- 7.6 The final area where we believe our guidance could be made more clear is in relation to ongoing overheads. Our guidance ‘Grants for the arts, How to apply for £15,000 and under’ says that we will not normally fund ongoing overheads. Our guidance in ‘Information sheet: Repeat activities, ongoing overheads and salaries’ then states that we do allow for some ongoing overheads to be funded.

- 7.7 We believe that it is this information within the Information Sheet that could benefit from being made clearer. Specifically in relation to how the proportion of overheads costs funding is requested for is calculated. [REDACTED] made reference to the guidance in the Information Sheet when we interviewed him as justification for being able to include salary costs in his application. We also believe that we should consider further guidance for projects moving from a commercial to a subsidised model, although such situations are rare.
- 7.8 It is our view that if we made our guidance clearer on the above matters we would assist applicants in ensuring that they are entitled to apply for funding and on determining whether what they were asking us to fund is eligible. This would also reduce the likelihood of ineligible applications, make the application process more transparent and strengthen controls.

## **8. List of people interviewed or consulted**

8.1 Interviews were conducted with the following people:

- (1) [REDACTED] and [REDACTED] (19 June 2014)
- (2) [REDACTED] (25 June 2014, 6 November and 8 December 2014)

Note: Interviews were attended by Tim Crook, Senior Manager, Quality Assurance & Risk Management, and Kal Kay, Director of Finance, except for 8 December 2014, which was attended by Liz Bushell, Director Finance and Corporate Services, Francis Runacres, Director Investment, and Punim Anda, Solicitor.

8.2 The following people were consulted with during the course of the investigation:

- (1) Jennie Kendal, Senior Manager
- (2) Maria Crossan
- (3) Nick McDowell, Director, international and London
- (4) Karen Bayliss
- (5) Jessica Wishart
- (6) Liam Waterhouse

## Appendix A: Call log to Customer Services

|               |                 |                             |
|---------------|-----------------|-----------------------------|
| 2013 Oct 31   | [REDACTED]      | - Keith Jukes               |
| 2013 Nov 4    | [REDACTED]      | - Keith Jukes               |
| 2013 Nov 7    | [REDACTED]      | - Ashley Egan - Transcribed |
| 2014 Feb 18   | [REDACTED]      | - Liam Waterhouse           |
| 2014 April 1  | [REDACTED]      | - Liam Waterhouse           |
| 2014 April 2  | Ashley Egan     |                             |
| 2014 April 10 | Thomas Kirk     |                             |
| 2014 April 10 | Iain Ferns      |                             |
| 2014 April 10 | Thomas Kirk     |                             |
| 2014 April 15 | Liam Waterhouse |                             |
| 2014 April 16 | Keir Gill       |                             |