

Written evidence submitted by James Frayne

Thank you for the opportunity to respond to the National Audit Office's recent report and to provide some additional explanation and context for our work during the Covid-19 emergency.

It is not for us to judge the Cabinet Office's procurement processes; how could we? But, as one of their suppliers of opinion research during the very early days of the crisis, it was extremely clear to us that the country faced a national emergency and it was also clear to us that the Government was panicking about how to talk to the public about what was an unprecedented healthcare challenge.

There is no doubt in our minds that, had the Government not refined its communications through serious opinion research, the early death rates would have been higher. The Government has been consistently criticised for locking down the country too late; it is hard to see how they could be simultaneously criticised for locking down too late, while also criticised for their decision to work with the agency (Public First) who they were already working with on another project. Again, it is for others to judge their procurement processes, but a national procurement exercise would likely have delayed their research by a month at least.

Public First's work was consistently of the highest quality, performed at unusually short notice, coming to specialise in researching hard-to-reach groups vulnerable to Covid-19. We would have much preferred to do this work via standard contractual mechanisms, but took the view that the state of national emergency meant we could not demand it.

We are well known as providers of opinion research, working with the world's top companies and national newspapers; we are members of the two national bodies governing such research: the British Polling Council and the Market Research Society. We do have political connections – every opinion research company does – but these relationships are hugely overstated; one of our lead researchers during this work for the Cabinet Office is a former Labour MP. We have since decided not to do any more Central Government work, given the low profit margins and high reputational damage, and are pleased to set the record straight over this work.

As we explain in detail here, we were disappointed with the NAO's process, which (a) deliberately ignored any question of the quality of work we delivered; (b) appears to have been built entirely – from the information they have shared with us through extensive FOI requests - on two newspaper articles, including a wildly anti-Government opinion piece which we were not quoted in and which was accepted wholly on face value; (c) saw them provide us with the report at very short notice - not having spoken to us at all during their writing - and which had to be rewritten completely because they failed to understand basic points of fact (for example, they were unaware of how much Public First invoiced the Cabinet Office, effectively overstating our gross fees by 50%. Again, this appears to be because they did not do substantive research.)

In this document, we provide a brief summary of our key points before looking in more detail at our work for the Cabinet Office during the first wave of the Coronavirus and the two areas the NAO focused particularly on: how we were contracted and perceptions of potential conflicts of interest.

Needless to say, we are ready to provide further evidence – on paper or in person – if the Committee wishes to hear more. We can make ourselves available at short notice at any point in the coming weeks and we would be very happy to answer any of your questions about any of these matters, or indeed to discuss the work of Public First more generally.

1. Key points in summary

- **The NAO had to completely rewrite their report where it referenced Public First.** The NAO failed to contact us at all during the writing of their report and their original document was poorly researched and drafted. Basic misunderstandings as a result of poor research meant the NAO had to extensively re-write their report where it covered our work. Extraordinarily, the NAO were unaware that Public First had invoiced around £550,000 for our work with the Cabinet Office, asserting simply that we received a contract worth £840,000. They therefore effectively overstated our fees by 50%. Furthermore, they had not seen any of the emails between Cabinet Office civil servants and Public First which set out the details of how we were hired. Despite being provided with this information, they refused to reflect the content of these emails in their report. FOI requests from Public First suggest that the NAO based their research entirely on a news report (which we were not quoted in) and a column by a left-wing activist. You will assume we are exaggerating but our very extensive FOIs into the NAO have not thrown up any additional research; only the NAO will know whether this is the case or not and they might be able to provide you with more evidence of their research.
- **Public First was hired in an emergency by Cabinet Office civil servants.** The NAO said the Cabinet Office did little to consider potential conflicts of interest in hiring Public First. But we provided the NAO with a large number of emails that clearly show we were hired by Cabinet Office civil servants during what was considered to be an unprecedented national health emergency. Public First was concluding a small research project for the Cabinet Office at the end of March 2020 on a wholly different topic when we were asked by civil servants to stop all existing work on this project and transfer our entire focus to researching public attitudes to Covid-19. We did so. These same civil servants asked us to continue to provide focus group research and the quality of our work was such that we carried on in this role. We cannot judge the Cabinet Office's procurement decisions, but people forget what the state of the public mood was in early March 2020. This was the time when pictures and stories from Continental Europe were emerging showing the devastation the pandemic was inflicting, while much evidence also suggested that the public was unaware of what was coming and sceptical of the need to take action; the Cabinet Office asked us to work with them in a state of very great concern.
- **Public First would have obviously preferred a formal contract.** Public First worked without a formal contract for many, many weeks. A contract was only agreed in May / June. Before this, we worked on an entirely ad-hoc basis. We were clearly not responsible for this arrangement and would have obviously preferred a formal contract from the outset. The Cabinet Office's behaviour is for it to justify but this would have allowed us to plan more effectively as an agency. We agreed to work for the Cabinet Office entirely on the basis of trust; indeed, we agreed to work for the Cabinet Office even before a Purchase Order number had been agreed; anyone that has worked with Government knows the risks associated with such a decision. But we agreed to work on the basis of trust because we were in a full-scale national emergency and we believed we could make a contribution.
- **Public First was an obvious choice for such a research project.** Public First has been on the Government roster of approved agencies for a number of years, conducting research into a range of public policy challenges. We joined this roster under a previous administration. We are well-known within opinion research circles as one of the go-to agencies for complex public policy research. We are members of both of the representative bodies that regulate opinion research in the UK: the British Polling Council and the Market Research Society. Our clients include many of the world's largest commercial enterprises and global leaders in areas such as education. They use us because we are good at what we do, not because of who we know.
- **Two partners personally led this project: it is unusual to have such senior oversight from an agency principal.** In hiring Public First, the Cabinet Office worked with a very senior team. Three of our five partners were immersed in work for the Cabinet Office. I personally led the project, with my fellow Partner, former Labour MP Natascha Engel. I was responsible for liaising daily (often at multiple points through the day) with Cabinet Office civil servants and overseeing all of the recruitment and also the final analysis. Natascha and I were personally in charge of all the main recommendations we made to Government. To have such senior involvement in research projects like this is extremely rare and ensured both excellent value and a very high-quality product throughout.

- **We completed well over 100 groups for the Cabinet Office, specialising in BAME and hard-to-reach groups.** The NAO asserted that there were risks of “underperformance” in the way the Cabinet Office contracted with various providers, including us. But the NAO refused to look at the product we provided, saying it was out of scope. Over the course of our project, we ran well over 100 focus groups with different audiences. Our analysis was of extremely high quality throughout and threw up many, many important insights which helped guide the Government’s communications during this emergency. The Committee can easily access our research summaries; we would very much like this research to be published. In fact, we urge it to be published.
- **Conflicts of interest have been overstated.** The NAO’s references to potential conflicts of interest are overstated. While it is true to say that me and my business partner (and wife) previously worked closely with Michael Gove, I had not spoken to Michael Gove in many, many months (perhaps years) before we began working with the Cabinet Office. Furthermore, Rachel Wolf was not involved at all in this research project; she does not do any of the opinion research at all at Public First. I have also not seen or spoken to Dominic Cummings, the Prime Minister’s former special adviser, in several years (not since 2016). Of course “links” are there to be made; Public First’s senior consultants have been working in and around Government and politics for many years and our networks are therefore extremely extensive. However, in turn, it is possible to draw perceived conflicts between our senior team and vast numbers of organisations and political teams – in fact, amongst each of the three main parties. One of our partners – a former Labour MP – served as Deputy Speaker of the House of Commons.
- **Public First operated on a “pay-as-you-go” deal throughout.** As we indicate above, Public First worked for many weeks without a formal contract. We were asked – typically a week ahead – to recruit and moderate groups on an entirely ad hoc basis. We could and clearly would have been fired had we not delivered a high-quality product. This did not change even when the contract was finally arranged. The “contract” was effectively a Purchase Order: it retrospectively accounted for the payments previously made to Public First, while setting aside funds that could theoretically be spent should the Cabinet Office wish to continue with their research. For this reason, Public First invoiced way, way under the figure of £840,000 (the figure the contract set aside).

2. An introduction to Public First

Public First is a mid-sized agency, specialising in opinion research on complex issues of public policy, as well as policy analysis and communications.

We are politically very diverse. Of the five partners in the firm, one was a Labour MP for 12 years, while another was a Labour Special Adviser. Me and Rachel Wolf (we are married) have Conservative-leaning backgrounds, although I have never been a member of any political party or worked for one. The fifth partner has a background in journalism, academia (his PhD included making a close study of domestic morale surveillance during the Second World War, the last time a similar project was attempted) and civil service communications. Across the senior team as a whole, we have staff members who have been active in the three main parties.

We are regulated by the main organisations who oversee opinion research in this country: we are members of the British Polling Council and Company Partners of the Market Research Society. We are also on the Government’s roster of approved agencies to provide opinion research and we have been for many years. I am also a Certified Member of the Market Research Society, a mark of quality research, only awarded to the most experienced group of researchers in the country.

Before working with the Cabinet Office on the Covid-19 research, we worked for a number of Government Departments and agencies on opinion research projects. These included the Department for International Trade, the Cabinet Office (on more than one occasion) and Ofsted. More recently, we completed an opinion research project for Ofqual and a policy report for the Department for Health and Social Care. We are regularly quoted in the media and elsewhere as experts on public opinion research. While our public profile is relatively low (like most agencies), we are well known in the opinion research and policymaking communities. We have a

particularly strong reputation for high-quality qualitative research. With three former Senior Civil Servants in leadership positions, we also understand Whitehall and the pressures facing officials in a crisis of this scale.

While our Government work has attracted attention, we are overwhelmingly a commercial agency. The vast bulk of our work is for large businesses, operating in the UK and internationally (in more than two dozen international markets). Such is the relatively low value of Government work – and the extremely low margins attached to Government work – we have decided to no longer compete for Government work. Contrary to common belief, Government work for an agency like ours is essentially loss-leading; the work is often interesting, but it requires such a massive effort to service it, it makes very little money given the low margins and, as we have seen, attracts the ire of the opponents of Government. Put simply, even though the idea of contributing to a great national endeavour – the fight against Coronavirus - appealed to us as patriots and people who have together spent decades as public servants, the meagre commercial reward and reputational damage suffered through becoming a political football make doing such work impractical in the long-term.

3. How we were contracted

The main stated focus of the NAO's report was *how* organisations like Public First were hired. However, despite their supposed focus, the NAO made only passing references to the specifics of our own arrangement. They noted that there was little formal paperwork, which was true. However, there were a large number of emails between us and Cabinet Office civil servants showing exactly how and why we were hired. The NAO saw emails from civil servants obviously very worried about the coming pandemic, desperately asking us whether we could recruit and run focus groups at short notice. To repeat, the purpose of this work was not to make the Government more “popular”, it was primarily to assess whether and how the public was reacting to crucial messages about protecting lives.

Before engaging in a detailed explanation over how we were hired, we would first like to dispel an important misconception. Public First was not awarded an £840,000 contract at the start of the crisis as stated in the press. Indeed, we were not awarded any contract at all until we had done many dozens of focus groups. What do we mean by this? We mean that there was no equivalent of a giant cheque awarded; there was no commitment of any description to pay for any focus groups at all. Instead, the Cabinet Office asked us, at short notice, to conduct a series of focus groups in early March as the virus hit British shores and panic gripped the Cabinet Office; then they asked for some more; and some more; and so on. It is important to remember just how little was understood about Covid-19 at the time and quite how panicked the country – and by extension the Government – was at the time. This truly was an unprecedented emergency more akin to war than peacetime.

The fact that Public First was engaged on a “pay-as-you-go” arrangement from day one must be seen in this context; while some will think this was a poor arrangement, it nonetheless massively reduced financial risk to the Cabinet Office and in turn the taxpayer. As we will explain below, even after we were contracted, this never changed; we were always hired on a pay-as-you-go arrangement, which could be terminated at any time. Typically, the Cabinet Office asked us to recruit a week ahead – and rarely more than ten days – which meant they were only ever committed to buying around six to twelve groups ahead.

We would have vastly preferred to have been contracted formally. Doing so would have given us the ability to make proper plans for the following months – something which agencies depend on in normal circumstances and even more so in the uncertainty during the Covid crisis. But the events surrounding the early stages of Covid-19 were not normal circumstances. We agreed to work for the Cabinet Office on the basis of trust – even without a Purchase Order number being available to us to invoice quickly at the start – and we did so because we saw this as a national emergency which we should help out on. (Despite the fact that this work was only a small fraction of our overall revenue we took the decision that as we were in receipt of public funding we would not to use any of the Government Covid support schemes such as the furlough scheme.)

We explain all this in more detail here.

Government Narrative work

How did this work come about?

In February 2020, Public First was commissioned by the Cabinet Office to conduct a piece of work into public attitudes to the new Government's policy priorities. This work did not go out to tender; our understanding is that the work came under the threshold at which the Government needed to do so, but we are not sure; the Cabinet Office will confirm the details.

Governments regularly commission projects like this. Ahead of any major policy shift, they typically test public attitudes to policy areas they are likely to seek to change. Governments might use research agencies two or three times a year for this sort of work. This is usually done to ensure that major policy decisions – which often cost well into the billions – are properly tested in advance. These focus groups are essentially designed to ensure good governance.

Public First was an obvious choice for this work. As an agency, we are not suited to every type of Government research work. However, we are extremely well suited to testing attitudes to public policy, with a view to helping Government refine policy proposals and the language associated with them. While we specialise in opinion research, our senior staff are all also policy experts. Our senior staff have worked in policy development or policy communications roles in Government Departments and Agencies, in think tanks and campaigns. Of all the research agencies in London, we are arguably the best suited to testing complex public policy. I cannot think of another agency who could rival our deep policy expertise. We understand opinion and how to test it, but all our senior staff are also saturated in the complexity of policy formation and communication. This is a unique combination.

We worked over February and early March to complete this work. We believe this piece of work was known as "Government Narrative" in the shorthand of the time.

Flipping to Covid-19 work

As we were nearing completion, in early March, it became clear that Britain was soon going to be hit very badly by the Covid-19 virus. While we still had a few nights of four focus groups to finish, we were asked to stop all work on Government Narrative and change to Covid-19 work. These instructions came from Cabinet Office civil servants. In a series of emails from these civil servants, we were asked to do everything we could to help them prepare their public health case.

While we provided these emails to the NAO, they chose not to reflect the content of them in their report. In refusing to do so, they fail to acknowledge the sheer sense of urgency that was evident at this point – which is surely central to the question over how and why we were hired. We strongly encourage you to read these exchanges. As you will see, the flip from the Government Narrative groups to the Covid-19 groups happened organically – amid panic – from Cabinet Office civil servants.

As we note above, while the NAO says there was little paperwork on how we were hired, this is disingenuous. The emails we provided them might be informal in the sense they did not involve either a formal tender, nor a highly systematised bureaucratic approach, but they very clearly do give a sense of how and why Public First was hired.

Contracting Public First

As these emails show, our work with the Cabinet Office was agreed with Cabinet Office civil servants. We note above that, initially, no contract was signed – and indeed we worked without a contract for many weeks. Public First worked on a pay-as-you-go arrangement, where the Cabinet Office agreed to pay for purely those groups they agreed to holding – and these groups were usually agreed a week ahead. In fact, this pay-as-you-go arrangement never changed, even after the contract, such that it was, was signed.

We finally signed a contract with the Cabinet Office in early June. This contract was essentially a PO: it retrospectively formally agreed to our prior work, and it also cleared funds for possible future work. The PO raised was for £840,000. However, some confusion has arisen over this figure. This was not an agreement to pay Public First £840,000; rather, it cleared funds of a high enough figure that the Cabinet Office would not need to go back for further clearance.

Public First ultimately billed the Cabinet Office for a total of around £550,000 (which the NAO acknowledged in their report only after we took them through all the invoices). Gabriel Milland was seconded into the Cabinet Office / Downing Street from early March and this is included in the £550,000 figure. We charged Gabriel Milland out at cost – his salary costs, plus a small administration fee, which is standard practice to cover the costs to Public First of all of the time to agree and manage his secondment.

4. Potential conflicts of interest

The NAO writes that the Cabinet Office did not sufficiently consider potential conflicts of interest in their work with us. You will see from the chaotic emails between civil servants and Public First that this was not at the front of their minds during the crisis. The NAO's comment was, from our perspective, disappointingly vague; it implied a conflict without engaging in any serious analysis.

Potential conflicts of interest between Public First and the Government have been overstated. For example, my personal links with Dominic Cummings have been raised repeatedly in the last six months, but I have not seen or spoken to Dominic Cummings for a number of years.

The main potential conflicts are these:

- (a) I worked with Dominic Cummings, the Prime Minister's former senior adviser for around 2 months in 2000 and over the calendar year of 2001 at the organisation Business for Sterling; I worked with Dominic Cummings for a year between the Spring of 2004 and the Spring of 2005 at a think tank; and I worked at the Department for Education as a civil servant between Spring 2011 and Summer 2012 when Dominic Cummings also worked at the Department.
- (b) When I worked at the Department for Education, Michael Gove was Secretary of State.
- (c) I helped Michael Gove's leadership campaign for a week in 2016.
- (d) Rachel Wolf, Founding Partner at Public First, worked for the Conservative Party on the education brief, when Michael Gove was Shadow Secretary of State for Education and when Dominic Cummings was his adviser, between roughly June 2008 and June 2009. She was not employed by Michael Gove at this time.
- (e) Rachel Wolf was a co-author of the Conservative Party election manifesto in 2019.

As people who have worked in and around the political scene for many years, it would be possible to draw links between me and Rachel Wolf and vast numbers of people in politics – and certainly every single Conservative Government since 2010. Indeed, almost every opinion research agency in the country that engages in political / Government research will have vast political and quasi-political networks. But it is not enough to simply to assert "potential" conflicts; it is important to look at the reality of these links.

- (a) I have not spoken to or met Dominic Cummings since very shortly after the EU referendum, in the summer of 2016.
- (b) While I have almost certainly bumped into Michael Gove around Westminster on a few occasions, I would estimate I have spent less than 5 minutes in his company since the summer of 2016. Along with more than 100 others (including Labour MPs), Michael Gove attended the Public First Christmas Party in December 2019, which he briefly addressed, but I did not speak to him at the event.
- (c) I therefore had no interaction of any description with either Dominic Cummings or Michael Gove over this contract and indeed I have had no formal interaction with them on any subject for some years.
- (d) Rachel Wolf plays no role in Public First's opinion research and was not involved in the Covid-19 research at all.

For a body supposedly focused on facts, it is surprising the NAO should have relied on perceptions rather than reality. Yes, they acknowledged that Michael Gove was not involved in the Cabinet Office's decision to work with Public First, but in raising the suggestion that the Cabinet Office should have done more to consider potential conflicts of interest, they essentially painted us as guilty by past associations. Again, they saw the emails between Public First and Cabinet Office civil servants clearly showing it was these civil servants who commissioned us for these early Covid-19 research groups.

5. Our work with the Cabinet Office

The NAO said the quality of the work we did for the Cabinet Office was out of scope for them. However, it is vital to understand what we actually did for the Cabinet Office.

Only those with little understanding of qualitative research would think that Government research projects were lucrative. They are all-consuming at the best of times and demand vast amounts of attention from senior people. This was particularly true of the research we did for the Government, not least because Public First knew of the vital importance of the work. Making sure that key health messages were being understood was a matter of life and death for thousands of British people. Two of the five partners in the firm devoted the bulk of their time to this project, with a third staff member being seconded into Government full-time.

We threw ourselves into this project because it was a national emergency and because we believed we would be able to help with the Government's communications effort. We believed that better communications would help to save lives.

Our work with the Cabinet Office on Covid-19 lasted from March until the Summer of 2020. Over the course of our work with the Cabinet Office we delivered well over 100 focus groups. Our research focused on the following:

- (a) Understanding the public mood during the crisis – people's concerns, fears and hopes;
- (b) Understanding how people were behaving during the crisis and how they were being affected by Government messaging;
- (c) Testing creative materials;
- (d) Testing public attitudes to Government press conferences, speeches and other communications.

While we were ultimately contracted by the Cabinet Office, and while they gave us directions for recruitment, we reported into PHE.

This was a vast research exercise. You might be wondering why we conducted so many focus groups. Our role was to help the Government refine its communications during the endlessly changing backdrop of the pandemic. This is not a job that could be done with a handful of focus groups. We had to test attitudes over a long period of time to see whether, for example, compliance with Government advice was waning; or to see whether particular vulnerable groups were hearing and heeding important health messages; or to see, in latter stages, how the Government could best encourage people to head back to work and on to public transport. Claiming that this could be done over a few days at the start of the crisis betrays a naivety about public opinion and public communications. Quite frankly, had the Government ceased testing early, there is no doubt in my mind that deaths would have been far higher.

In times like this, communications really is vital and really does make the difference between life and death. It is absolutely essential that Governments are able to communicate risk and risk mitigation in the broadest and clearest possible terms. While the public were tuning into Government and media updates in great numbers, such was the complexity of the situation that the Government's case needed endless refinement to ensure people were hearing what they needed to hear.

We had to adapt and evolve endlessly during the emergency, as Government concerns changed. At various points, the Government became worried about the health of particular groups. Initially, their concerns were, unsurprisingly, focused primarily on older people. But there were points where they became very worried about BAME communities specifically, as well as, for example, late middle-aged men who were at risk but seemingly showing a lack of regard for the risks to them.

Over time, we came to specialise in research amongst BAME communities in large urban centres – arguably the groups that were most seriously affected overall during the crisis. For example, we did large numbers of groups of multi-generational households of different ethnic backgrounds. We also ran a number of groups of hard-to-reach audiences; on one evening we ran groups of Romanian manual workers, in Romanian. However, over the course of the project, we ran groups from an array of backgrounds, right across the country. Almost from the beginning, all of our groups took place online.

It is unusual in these projects, for them to be led by the principal, but I led the overall project, overseeing all recruitment and liaising with the Cabinet Office on which audiences were most suitable in a given time. I also oversaw the write-ups of the groups and led on strategic recommendations. I moderated many of the groups too. Natascha Engel, a former Labour MP and Deputy Speaker, also played a key role throughout the project, moderating many groups and leading strategic recommendations. An Associate Director, was our liaison with PHE throughout, ensuring the discussion guide and the “stim” (the creative materials) were delivered on time.

In short, the Cabinet Office worked with a very senior team and we produced work of very high quality throughout. To say this is uncommon in our industry would be an under-statement. As I note above, our work for Cabinet Office in this period, particularly in the early days of the crisis, was amongst the best work this agency has produced. It is therefore frustrating that the NAO did not seek to look at any of the work we produced at all.

Along with the focus group research we provided, we also seconded a Partner into Cabinet Office / Downing Street for the duration of the period. Gabriel Milland, a former head of communications at the Department for Education and Ministry of Justice, played an integral role in the Government’s communications operation at this time. Widely viewed as one of the best communications operators in London – and in the very top handful of crisis communications specialists – Gabriel worked seven days a week for much of the crisis. Gabriel’s ability and experience in this area can be judged by the fact that as a Cabinet Office Deputy Director he developed the first ever Standard Operating Model for media relations work across government. He was ideally suited to helping ensure the unprecedented challenges to communications machines across Whitehall were met at the height of the crisis. A key part of his role was to serve as communications adviser to the Government’s Chief Scientific Adviser.

6. Engaging with the NAO

The NAO’s stated remit did not align with their reporting. On the one hand, the NAO both refused formally to take a view on whether the work we did was (a) high quality; and (b) delivered to time, spec and budget, while also raising the prospect that the way we were contracted made it more likely that the work would be of lower quality than it otherwise might have been. Similarly, they also made clear that their decision to include us in their report was because of previous media coverage, as opposed to a rigorous assessment of our interaction with Government and whether it was unusual, but they ignored other firms in a similar position to ours. Being so beholden to mere media coverage – in just one extremely anti-Government newspaper – is an odd way for a public body committed to the most rigorous analysis to behave.

When we asked the NAO whether they had seen any of our product, they said they had not, even while raising the prospect that quality might be affected by the way we were procured. It goes without saying that this response is frustrating. Our research is available for you to read and we would be very happy to discuss our findings with you; we would also be happy to discuss our approach to qualitative research with you. On the point of quality, of all the projects we have completed since our formation, the work we did for Cabinet Office on Covid-19 was some of our best.

It was also frustrating for us to be included in a report which featured a number of businesses that were not experts in their particular field (usually PPE). Public First was a natural choice for this project. We are a well-known and respected provider of opinion research, who have been regularly used by the world’s largest companies and our work is regularly cited in national media outlets. We are members of the country’s leading regulators of opinion research and we abide by their respective codes of practice. We have been on the Government’s roster for research for several years – before this particular administration – and had done other work for the Cabinet Office in the past (again, under a different Prime Minister).

More generally, the form of procurement for this work was clearly not our decision – but we were proud to do intensive work, at consistently very short notice, with hard-to-reach groups, during the Covid-19 response to inform the Government’s response to an international crisis. That work was consistently delivered at high quality, on extremely tight deadlines. Furthermore, it is also vital to note, that there was no commitment, at any point, for the Government to spend more than a small sum with us – they commissioned us on a week-to-

week basis because they needed a company that could rapidly identify hard to reach audiences and identify their knowledge and response to the guidance on Covid-19.

We do not think it is possible to comment on the NAO's report without making some general comments about our wider experiences with them. In short, our experience with the National Audit Office in their investigation was profoundly shocking to us. For most of us, this was the first time we have dealt with the NAO; our sense was always that they were a highly professional, sober, evidence-led organisation. Instead, we found an organisation incapable of serious research, making the most basic and fundamental errors, apparently oblivious to the seriousness of their reporting.

You will forgive us for taking some time out to explain this process, given how important the quality of their research is to the functioning of your Committee.

The first we knew of their investigation was on 26th October, when a junior NAO official wrote to us attaching sections of their draft report which referenced Public First. They did not seek to speak to us in advance and merely sent us their finalised draft asking for comment. I urgently requested a call and suggested an agenda for the call. This call took place on 27th October. I have extremely detailed contemporaneous notes, which I can provide you.

However, in the call with a Director, and the junior official who had sent us the report, it quickly became clear they had done almost no research into our arrangement with the Cabinet Office (at this point, we did not realise how little research they had done; this only became clearer later after a series of FOIs). For example, they did not know how much we had actually billed the Cabinet Office and had assumed it was £840,000; they did not know who worked on the research at Public First; they did not know what we actually did or which groups we researched; they had not seen any of the emails between Public First and the Cabinet Office in the early days of the crisis, nor had they requested to see them; they did not know about Gabriel Milland's secondment; they did not know we were on a pay-as-you-go contract; they did not know about the POs the Cabinet Office had raised in order to pay us. In fact, they knew almost nothing about our arrangement with the Cabinet Office at all.

Immediately following the call, we provided with them a narrative description, along the lines to the one we provide in this document, with large amounts of supporting material: emails between us and the Cabinet Office; all the invoicing details; the official paperwork in the form of contracts etc. Following this, the NAO completely re-wrote the sections in the report on Public First.

Such was our shock at the quality of their research, I put in several Freedom of Information requests on 26th October to understand their investigative process, as well as an additional Subject Access Request under my name. What was returned to us was extraordinary. The NAO provided us only with snippets of emails about us and are currently trying to keep various references to Public First secret. However, from what we can piece together, their research comprised entirely of reading a single newspaper article – which we were not even quoted in – from The Guardian, and a column by the left-wing activist George Monbiot, also in The Guardian. These two pieces were the only things sent around about us, to the best of our knowledge. A further article – in the Daily Telegraph – was subsequently sent around.

You will assume we are exaggerating; on the contrary, the FOIs and the accompanying SAR did not throw up anything else visible of any description. There was no research dossier, no profiling of senior staff or the agency as a whole, no detailed reports of discussions with Cabinet Office officials, no internal discussions of what we provided (or indeed whether we had actually provided the work at all).

At this point, we should be fair and note that it is possible the NAO are keeping certain things secret from us which would explain more – details they are keeping secret because it would count as “ongoing research” or some such thing. However, our FOIs and Subject Access Request would have thrown up at least some of this additional research. You may want to take this up with the NAO and they will confirm this either way.

While this is beyond the scope of this report, and you might consider us to be hopelessly conflicted here, but we very strongly encourage you to investigate the quality of the research processes within the NAO. Can we encourage you at least to look into the research into Public First?

December 2020