



9 February 2021



Dear 

**Freedom of Information Act 2000 - Request CA113**

With reference to your request for information received on 13 January 2021 and the acknowledgement sent on 14 January 2021 request number CA113 please find the response provided below.

**Question:**

*Please can you provide copies of the qualitative written responses from operators who submitted bids for your local authority's rental e-scooter trial, removing commercially sensitive information as required.*

**Answer:**

The Combined Authority does hold the information you have requested. All fourteen companies who submitted bids have been consulted on the disclosure of their information and of the nine who have responded all of them wish for their information to be withheld and one has provided a redacted version of their response for disclosure.

The operators who responded to consultation on the disclosure of their information included the following concerns:

- Disclosure would provide confidential information in the form of the details of business operations, products and operating procedures, including but not limited to hardware specifications, operating strategy and processes, business partnerships, company policies and processes.
- The information provided was provided in confidence.
- The information provided may be classified as commercially sensitive, proprietary and trade secrets.
- The disclosure of the information would severely prejudice the commercial interests of the operator.
- The operator objects to any disclosure on the grounds set out in Section 43 of the 2000 Act.

The Mayor's Office  
72 Market Street  
Ely  
Cambs  
CB7 4LS

- The information provided contained details of proprietary software and hardware and operating processes. Disclosure of any of this information to competitors or third parties will cause severe damage to the business.
- The information comprises commercially sensitive materials and contains trade secrets. Disclosing this information would, or would be likely to, prejudice the commercial interests of the operator by revealing details of its unique approach to tender applications with city councils and of its confidential features, capabilities and business methods -all of which are set out in detail in the bid submission.
- Revealing this information would undermine the operator's competitive advantage, both in the highly contested UK market and elsewhere.
- The information contains highly commercially sensitive information.
- The information includes personal data which is exempt from disclosure under Section 40(2) of the 2000 Act.

For the reasons set below we will not be disclosing the requested information to you, but will be providing the redacted information provided by one operator.

Section 41(1) of the Act provides that:

**41.— Information provided in confidence.**

(1) Information is exempt information if—

(a) it was obtained by the public authority from any other person (including another public authority), and

(b) the disclosure of the information to the public (otherwise than under this Act) by the public authority holding it would constitute a breach of confidence actionable by that or any other person.

The Information Commissioner's guidance on the application of this exemption is available at:

<https://ico.org.uk/media/for-organisations/documents/1432163/information-provided-in-confidence-section-41.pdf>

The guidance confirms that:

*Information will be covered by Section 41 if:*

- *it was obtained by the authority from any other person,*
- *its disclosure would constitute a breach of confidence.*
- *a legal person could bring a court action for that breach of confidence, and*
- *that court action would be likely to succeed*

*When determining if disclosure would constitute a breach of confidence, the authority will usually need to consider:*

- *whether the information has the quality of confidence,*
- *whether it was imparted in circumstances importing an obligation of confidence,*  
*and*

- *whether disclosure would be an unauthorised use of the information to the detriment of the confider.*

[ ... ]

*When determining if an action for breach of confidence would be likely to succeed, the authority will need to consider whether there would be a public interest defence to the disclosure.*

The exemption is designed to give those who provide confidential information to public authorities, a degree of assurance that their confidences will continue to be respected, should the information fall within the scope of a freedom of information request.

In considering whether disclosure would be a breach of confidence of the requested information:

- Given that the information provided is more than trivial and is not otherwise accessible it has the necessary quality of confidence and those providing the information have a genuine interest in the contents remaining confidential. The guidance confirms that the information does not have to be highly sensitive, but nor should it be trivial. The preservation of confidences is recognised by the courts to be an important matter and one in which there is a strong public interest.
- The content of the information, due to its commercial sensitivity, makes it implicit that there is an obligation of confidence.
- Disclosure of these elements of the requested information would be an unauthorised use of the information to the detriment of those providing the information because the disclosure of commercially sensitive information will be detrimental to their commercial interests by making that information available to potential competitors.

In considering whether the Section 41 exemption would apply to disclosure of the requested information:

- The information was obtained by the Authority from other persons, namely operators;
- As above, its disclosure would constitute a breach of confidence; and
- Those providing the information could bring a court action for that breach of confidence in order to protect their commercial interests from detriment

It is also necessary to consider whether such court action for breach of confidence would be likely to succeed. Although Section 41 is an absolute exemption, meaning that it is not subject to the application of a public interest test, the issue of public interest does still arise because a public interest defence would be available to a legal action for breach of confidence. The caselaw referred to in the Information Commissioner's guidance confirms that the test is now whether there is a public interest in disclosure which overrides the competing public interest in maintaining the duty of confidence. The test assumes that the public interest in maintaining confidentiality will prevail unless the public interest in disclosure outweighs the public interest in maintaining the confidence. As the guidance puts it:

*[ ... ] in cases where the duty of confidence protects a person's private interests, it is hard to envisage circumstances where the public interest in transparency and accountability alone, would be sufficient to override the public interest in maintaining that individual's privacy*

In this case there is no suggestion of misconduct, illegality or gross immorality (such as misfeasance, maladministration or negligence) in the procurement exercise to support disclosure nor is there any suggestion that disclosure would serve to protect public safety. In all the circumstances the Authority has concluded that the public interest in disclosure does not override the competing public interest in maintaining the duty of confidence. In making that judgement the Authority has had particular regard to the potential detriment that disclosure would cause to the commercial interests of both the authority and those participating in the procurement exercise, including the fact that disclosure could reveal information that would assist competitors and would undermine confidence in the Authority's ability to maintain confidentiality in procurement exercises.

Your request is therefore refused on the basis that the information requested is exempt from disclosure under Section 41 of the Act.

The Authority has also considered the application of the exemption at Section 43 of the Act.

Section 43(2) of the Freedom of Information Act 2000 ["the Act"] provides that:

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

The Information Commissioner's guidance on the commercial interests exemption at Section 43 is available at:

<https://ico.org.uk/media/for-organisations/documents/1178/commercial-interests-section-43-foia-guidance.pdf>

In order for this exemption to be engaged the following criteria must be met:

- *the actual harm which the public authority alleges would, or would be likely to, occur if the withheld information was disclosed has to relate to the applicable interests within the relevant exemption;*
- *the public authority must be able to demonstrate that some causal relationship exists between the potential disclosure of the information being withheld and the prejudice which the exemption is designed to protect. Furthermore, the resultant prejudice which is alleged must be real, actual or of substance; and*
- *it is necessary to establish whether the level of likelihood of prejudice being relied upon by the public authority is met – ie disclosure 'would be likely' to result in prejudice or disclosure 'would' result in prejudice.*

The guidance explains that:

*"would...prejudice" means that prejudice is more probable than not, ie that there is a more than 50% chance of the disclosure causing the prejudice, even though it is not absolutely certain that it would do so. "Would be likely to prejudice" is a lower threshold. It means that there must be more than a hypothetical or remote possibility of prejudice occurring; there must be a real and significant risk of prejudice, even though the probability of prejudice occurring is less than 50%.*

And defines “commercial interest” as follows:

*“...a commercial interest relates to a person’s ability to participate competitively in a commercial activity, i.e. the purchase and sale of goods or services.”*

Section 43(2) is a qualified exemption and is therefore subject to public interest considerations.

It is the Combined Authority’s view that disclosure of the written responses submitted by the operators would be likely to prejudice the commercial interests of both the Authority and the individual operator in the procurement process, for the reasons given by the operators as summarised above.

Were the Authority to disclose the information requested it could affect its ability to contract services at a competitive rate in the future by making potential bidders reluctant to engage with procurement exercises for fear of any commercially sensitive information provided in their bid being disclosed to their competitors. Parties who were well placed to submit competitive bids in future procurement exercises might therefore decide not to do so thereby undermining the Authority’s ability to procure goods and services at competitive rates and prejudicing its commercial interests.

The information requested contains commercially sensitive information about the individual participants’ business models, pricing and methodologies for providing the required service.

The Section 43(2) exemption is therefore engaged. The Combined Authority must therefore consider the balance of public interest in deciding whether to disclose the information.

There is clearly a general public interest in public bodies being open, transparent and accountable particularly in the context of the expenditure of public funds.

However there is also a public interest in public bodies being able to procure goods and services effectively without potential bidders being reluctant to participate for fear of their commercially sensitive information being disclosed to competitors.

On balance the Combined Authority takes the view that the public interest arguments in favour of maintaining the exemption and withholding the information, in particular the arguments about the likely prejudice to both the Authority’s and participants’ commercial interests, outweigh the public interest arguments in favour of disclosure.

Your request for information is therefore refused on the basis that the information requested is exempt from disclosure under Section 43 of the Act.

I hope this information is helpful but if you are unhappy with the service you have received in relation to your request and wish to make a complaint or request a review, you should write to us via our contact us email address – [contactus@cambridgeshirepeterborough-ca.gov.uk](mailto:contactus@cambridgeshirepeterborough-ca.gov.uk) or write a letter to Complaints, Cambridgeshire and Peterborough Combined Authority, the Mayor’s Office, 72 Market Street, Ely, Cambs CB7 4LS within 40 days of the date of this e-mail.

If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at: Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, or via their website: <https://ico.org.uk/>

Generally, the ICO will not undertake a review or make a decision on a request until the internal review process has been completed.

Yours sincerely



**Sue Hall**  
Governance Assistant





# **Cambridgeshire and Peterborough Combined Authority**

## **E-scooter trial proposal**

**Written response submitted by Voi Technology UK Limited**

*17th July 2020*

## Executive summary

We are pleased to submit our proposal for e-scooter and e-bike trials to the Cambridgeshire & Peterborough Combined Authority (CPCA) and we would welcome the opportunity to partner with you to launch the region's first electric scooter and e-bike sharing trial. Voi is Europe's fastest growing micro-mobility company with unrivalled experience managing large scale dockless micro mobility rental services in cities and towns of all sizes. Born in Sweden in 2018, today we are present in 40 cities across Europe and are proud to have delivered more than 20 million safe journeys for our riders.

However, [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

We believe that micro-mobility has the potential to **cause modal a shift** and reduce the reliance on cars in cities. For many European cities micro-mobility aligns with their sustainability agendas to reduce GHG emissions and improve air quality. Voi's [REDACTED]

[REDACTED] Micro-mobility is a revolutionary mobility movement with demonstrable consumer demand. To maximise its potential, Voi [REDACTED]  
[REDACTED]

### Since its inception, Voi has led the e-scooter market:

1. **First in Europe** - Launching Europe's first dockless e-scooter service in Stockholm (Summer 2018). Voi's leadership team (in previous roles) launched the UK's first legal e-scooter rental service (November 2018 in Queen Elizabeth Olympic Park).
2. **Education** - Creating the first third-party accredited [E-scooter traffic School](#) which has trained +400,000 riders to date.<sup>1</sup>
3. **Health** - Rolling out Europe's first self cleaning handlebars to stop the spread of and to fight Covid-19.
4. **Decarbonisation** - The first company in the industry to deliver a carbon neutral service (Jan. 2020).
5. **Transparency** - The only e-scooter operator to conduct a full independent [Life Cycle Analysis \(LCA\)](#) by EY<sup>2</sup> to confirm that the lifespan of Voi scooters is +2 years and CO2 emissions as low as 35 grams per driven kilometer.
6. **Innovative** - Becoming the first operator to use swappable batteries and introduce [REDACTED]  
[REDACTED]
8. **Technology** - First operator to meet German vehicle standards (widely considered the highest standards in the global market). Currently Voi has three different models type-approved for the German market.
9. **Inclusive** - Launching Europe's first travel pass for those from low income groups (Voi-4-all) and [REDACTED]  
[REDACTED]  
[REDACTED]
11. **Responsible**: We scale responsibly [REDACTED]  
[REDACTED]

<sup>1</sup> <https://ridelikevoila.com/enter>

<sup>2</sup> [https://www.ey.com/en\\_gl/automotive-transportation/how-micromobility-is-moving-cities-into-a-sustainable-future](https://www.ey.com/en_gl/automotive-transportation/how-micromobility-is-moving-cities-into-a-sustainable-future)



**A. Voi's Offering to the CPCA**

**SUSTAINABILITY**

Only operator in the industry to complete and share a Life Cycle Analysis, conducted independently by EY. The assessment confirmed a **+2 year lifespan** for our scooters and that **swappable battery scooters** reduce operational emissions by 92%. We implement **zero emission operations** using only electric vehicles charged with renewable energy for our operations and our service is **carbon neutral**.

[REDACTED]

[REDACTED]

**TECHNOLOGY**

[REDACTED]

**COMPLIANCE**

[REDACTED]

**OPERATIONAL**

[REDACTED]

**PARKING**

[REDACTED]

[REDACTED]

micro-mobility on cities.

**B. How Voi fulfills CPCA criteria**

**1. Voi's E-scooter:** [Redacted]

**1.1 Description**

For the CPCA's 12-month trial, Voi proposes [Redacted]  
[Redacted] It  
is designed for extensive shared use, [Redacted]  
[Redacted] We are extremely proud [Redacted]  
[Redacted] Voi conducted and shared the first [Life Cycle Assessment](#) for e-scooters, the independent  
assessment was led by EY and revealed that [Redacted]  
[Redacted]

[Image redacted]

**User benefits** [Redacted]  
[Redacted]

**Sustainability features** [Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]

**Safety features** [Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]

**User experience features** [Redacted]  
[Redacted]  
[Redacted]  
[Redacted]

**Technical specifications** [Redacted]  
[Redacted]  
[Redacted]  
[Redacted]

[Redacted]

1.2 Vehicle [Redacted]

[Redacted]

2. Voi's [Redacted]

2.1 Description

Voi has recently developed the [Redacted] in the market.

User benefits

[Redacted]

[Image redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

- [Redacted]

Sustainability  
Features

Safety Features

User Experience  
Features

Technical  
specifications

[Redacted technical specifications]

2.2 Vehicle Allocation & DfT compliance

The minimum critical mass and total vehicle allocation [Redacted]

3. Timescales for Mobilisation

3.1 The Voi Scaling Model

We have created a model using [Redacted]

[Redacted content]

3.2 [Redacted content]

[Redacted text block]

are as follows:

[Image redacted]

See Annex A for the detailed operational plan, below is a high-level overview:

[Redacted text block]

### 3.3 Suggested Operating Area

[Redacted text block]

[Redacted text block]

Cambridge

Peterborough

[Image redacted]

[Image redacted]

Suggested  
Operating  
Area

[Redacted text block]

[Redacted text block]

Key Points of Interest

[Redacted text block]

Fleet size

[Redacted text block]

Potential fleet size:

[Redacted text block]

3.4 Voi's commitment to the CPCA

[Redacted text block]

### 3.5 Mobilisation Considerations

**Operating during lockdown:** In the event of any future lockdowns due to COVID-19, Voi is capable of continuing to operate under a strict operating regime - including [REDACTED] can keep moving.

[REDACTED] At present, it is essential to deploy e-scooters and e-bikes to reduce over-reliance on public transport and help get cities moving again whilst socially distancing. However, over time, [REDACTED] Covid-19 passes.

### 4. Charging Model

**Voi's pricing strategy** [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[Redacted]

[Redacted]

[Redacted]

|            |            |            |
|------------|------------|------------|
| [Redacted] | [Redacted] | [Redacted] |

### 5. Infrastructure Requirements

As a result of the CPCA's investment in world-class Dutch-quality walking and cycling facilities, the region has some of the best cycling infrastructure in the UK. As such, Voi does [Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

## 6. Vehicle Littering and Recharging

### 6.1 [Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

### 6.2 Parking Solutions

[Redacted]

#### Incentivised parking zones

[Redacted]

Restricted parking zones

[Redacted]

Physical Infrastructure

[Redacted]

Virtual Docking

[Redacted]

6.3 Recharging

Voi operates [Redacted]

Swappable Batteries

Our fleet of vehicles has swappable batteries, an innovation [Redacted]

|            |            |            |
|------------|------------|------------|
| [Redacted] | [Redacted] | [Redacted] |

6.4 Daily Operations

Daily Swapping of Batteries [Redacted]

Self-rebalancing

[Redacted]

Voi's Guarantee

[Redacted]

Voi's Efficiency

[Redacted]

[Redacted]

[Redacted]

Education

Voi's users [Redacted]  
[Redacted] Furthermore, Voi [Redacted]  
[Redacted] and parking  
events.

[Redacted]

7. User App

[Redacted]

[Redacted]  
[Redacted] of the CPCA.

### 7.1 User journey

- [Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]
- [Redacted]  
[Redacted]  
[Redacted]
- [Redacted]  
[Redacted]  
[Redacted]
- [Redacted]  
[Redacted]  
[Redacted]  
[Redacted]
- [Redacted]  
[Redacted]  
[Redacted]
- [Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]

#### The User Journey in images:

[Image redacted]

#### Voi's In-App Safety & Parking Onboarding Journey

[Image redacted]

[Image redacted]

### 8. Membership of CoMoUK and Department for Transportation

Voi is a proud member of CoMoUK and the Department for Transport. We [Redacted]  
[Redacted] Evidence of our membership with both CoMoUK and the Department  
for Transport can be found in [Annex B](#) and [Annex C](#).

### 9. Organogram

Voi's organisational structure ensures we can [redacted]  
[redacted]  
[redacted] teams.

These work [redacted]  
[redacted]  
[redacted]

[Image redacted]

Your [redacted]

[Image redacted] [Image redacted]  
redacted]



[Redacted text block]

### 10.2 Safe adoption and Use

Voi takes [Redacted] awareness.

#### User education & safety awareness



**Online virtual riding school:** Voi is proud to have launched the world's first accredited electric scooter training school, [RideLikeVoila](#). [Redacted]

[Redacted text block]



**Safety events & [Redacted]** [Redacted]

[Image redacted]

[Redacted text block]

[Image redacted]

[Redacted text block]



[Redacted text block]

[Image redacted]

10.3 [Image redacted]

10.4 [Image redacted]

[Image redacted]

[Redacted]

[Redacted]

### 10.5 Sanitary Measures for COVID-19

[Image redacted] [Redacted]

[Image redacted] [Redacted]

[Image redacted] [Redacted]

## 11. Environmental & Ethical Policies

The CPCA has set ambitious environmental, social and economic objectives in its [Local Transport Plan](#). [Redacted]

### 11.1 Key highlights from our sustainability strategy

- **Transparency & evidence:** Voi was the first micro-mobility operator to conduct and publish a [full Life Cycle Assessment of our service](#). The assessment was conducted independently by EY according to ISO 14000 standards. [Redacted]

[Image redacted]

*Full Life Cycle Assessment of our e-scooter service conducted by EY.*

- **Verified lifespan:** we have invested [Redacted]



[Redacted text block]

11.3 [Redacted]

[Redacted text block]

[Redacted text block]

[Redacted text block]

[Redacted] [Image redacted]

12. Proposed [Redacted]

[Redacted text block]

[Redacted text block]

[Image redacted] [Redacted text block]

[Redacted text block]

[Redacted text block]

[Image redacted]

[Redacted text block]

[Image redacted]  
[Image redacted]

[Redacted text block]

[Redacted text block]

[Image redacted]  
[Image redacted]  
[Image redacted]

[Redacted text block]

[Image redacted][Image redacted]

[Redacted text block]

[Redacted text block]

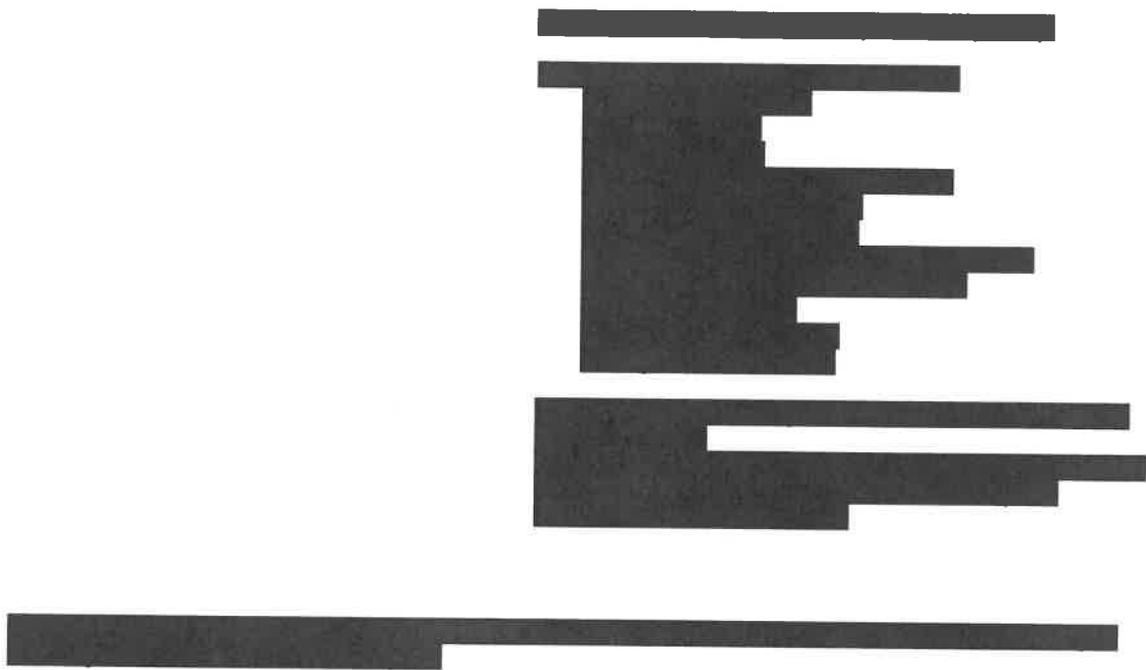
[Image redacted][Image redacted]

The Voyager [Redacted]

[Redacted]

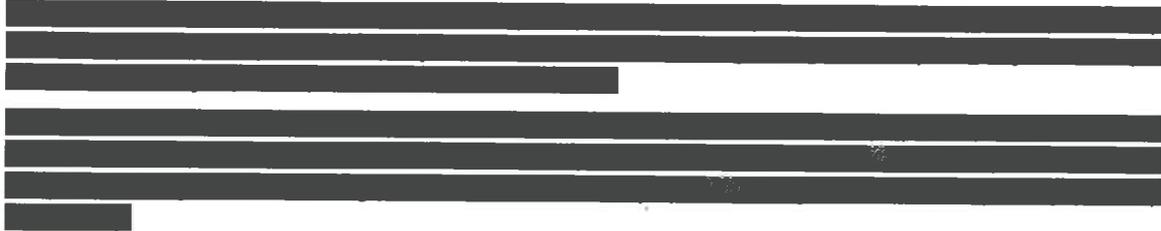
[Redacted]

**voi.**



**Thank you.**

The entire local UK Voi team, as well as the Sweden-based team and all those in Voi's European cities, would like to thank the Cambridgeshire & Peterborough Combined Authority for the invitation to tender for these e-bike and e-scooter trials.



On behalf of the entire Voi team,

[Image redacted]

[Image redacted]

**Richard Corbett**, General Manager Voi for  
UK, Ireland & Benelux

**Fredrik Hjelm**, CEO and co-founder of Voi

C. Annex

Annex A - Operational Plan

|            | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] |
|------------|------------|------------|------------|------------|
| [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] |

Annex B - Membership to CoMoUK

comouk supporting shared transport

Shared Cars Shared Bikes Shared Rides **Shared Scooters** Co-mobility & Themes

## Shared Scooters

What Who Why

Below is a list of shared e-scooter operators who are interested in working in the UK and links to their websites. We will add more details to each post as we receive them.

- NEUPON (MEMBERS) +
- RIDE GOTCHA +
- SPIN (MEMBERS) +
- TIER (MEMBERS) +
- VOI (MEMBERS) -

Founded in 2016, VOI is a Swedish micro mobility company, operational in 35 European cities offering electric vehicle sharing in partnership with cities and local communities. VOI is committed to sustainability - achieving zero-emission operations and a fully carbon-neutral service since January 2020. VOI want to make sure that the transformation happens the right way - through real innovative technology, open and transparent dialogue with cities and Governments and by adapting our product to local needs. VOI are members of CoMoUK.

[SEE MORE](#)

- WHEELS (MEMBERS) +
- WIND +
- ZIPP MOBILITY (MEMBERS) +

**Annex C - Membership to Department for Transport**  
[Image redacted]