



Foreign &  
Commonwealth  
Office

**Government Hospitality  
Protocol Directorate**  
Foreign and Commonwealth Office  
Lancaster House  
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London SW1A 1BB

Website: <https://www.gov.uk>

27 October 2017

**FREEDOM OF INFORMATION ACT 2000 REQUEST REF: 0824-17**

Thank you for your request for information which we received on 1st September. In your request you asked for;

- *A line by line data dump of the financial management system in use by the FCO covering the time period 1 January 2016 to 31 December 2016.*
- *This information should contain data relating only to the following subhead: 619626 - Government Wine Cellar.*

I can confirm that the Foreign and Commonwealth Office does hold information falling within the terms of your request.

I attach to this letter a spreadsheet of information relating to the FCO Account code 619626, covering transactions that relate to the Government Hospitality wine cellar.

Some of the information within the spreadsheet has been redacted. Those items redacted in columns P, Q and S have been withheld under Section 43 (2) of the FOI Act 2000, commercial interests. Those items redacted in column I have been withheld under Section 40 of the FOIA 2000, personal information, and S 43(2), commercial interests.

The use of the S.43 (2) exemption has been carefully considered. The factors in favour of disclosure of this information, including the general public interest and greater transparency and accountability, were carefully weighed against the need to allow public authorities and their commercial suppliers the space to conduct their business without fear of disclosure of sensitive commercial information.

We consider that the release of detailed information about stock price, quantities or supplier details relating to purchases for or items already held in the GH cellar poses a risk to the protection of commercially confidential information. Failure to protect such commercially sensitive information may prejudice our legitimate commercial interests and those of our suppliers. In this instance, there are clear commercial sensitivities about releasing details of e.g. costs of stock, which might be used to undermine our ability to achieve pricing reductions from suppliers in future. As a public authority, we are under a strict obligation to deliver best value for money, and we judge that to do so, we should withhold details of the costs of stock. In this case, we believe that the balance of the public interest lies in not releasing the information.

In some parts of column S details of individual suppliers have also been redacted under

S. 43 (2) of the FOI Act 2000. As highlighted above, we have a duty to protect not only the commercial interests of Government Hospitality, but also of its suppliers. We have included those details where identification of the supplier is self-evident from the product listed in column I.

The use of the S.40 (2) exemption relates to personal data relating to third parties contained in column I. The inclusion of the names of officers in column I was to identify members of staff who had used corporate credit cards or Government Procurement Cards to carry out individual transactions. We regard this information as personal data relating to third parties, the disclosure of which would contravene one of the data protection principles. In such circumstances sections 40(2) and (3) of the Freedom of Information Act apply. In this case, our view is that disclosure would breach the first data protection principle. This states that personal data should be processed fairly and lawfully. It is the fairness aspect of this principle, which, in our view, would be breached by disclosure. In such circumstances, s.40 confers an absolute exemption on disclosure. There is, therefore, no public interest test to apply.

Yours sincerely,

Government Hospitality  
Protocol Directorate  
Foreign & Commonwealth Office



We keep and use information in line with the Data Protection Act 1998. We may release this personal information to other UK government departments and public authorities.