



Foreign &  
Commonwealth  
Office

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Foreign and Commonwealth Office  
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12 September 2016

**FREEDOM OF INFORMATION ACT 2000 REQUEST REF: 0603-16**

Thank you for your email of 20 June asking for information under the Freedom of Information Act (FOIA) 2000. You asked:

*I write regarding the following FCO-funded NI-CO projects with Bahrain:*

- a) Neighbourhood/community policing (since 2014)*
- b) Prisons (since 2015)*
- c) C&C support (since 2016)*

*In respect of each project, please provide information about:*

- i) the number of NI-CO staff who have visited Bahrain, who they are, when they visited, and what they did in Bahrain*
- ii) the number of Bahraini officials who have visited the UK, who they are, when they visited, what they did in the UK.*
- iii) The number of IPAB and OSJA forms that were completed in respect of the above, if they were approved and by whom.*

*In respect of project 'c' only (C&C support), please provide a project summary.*

*I am aware that NI-CO personnel have worked with Bahraini officials from Jau, Hidd, Isa Town and Dry Dock custodial facilities and I expect your disclosure to include these liaisons. As required by the information commissioner, a search of backup servers should also be conducted.*

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

**Neighbourhood/community policing (since 2014)**

- 1) The number of NI-CO staff who have visited Bahrain, who they are, when they visited, and what they did in Bahrain*

One NI-CO short-term expert visited Bahrain in February 2015.

II) *The number of Bahraini officials who have visited the UK, who they are, when they visited, what they did in the UK.*

One visit took place to Northern Ireland in March 2015.

III) *The number of IPAB and OSJA forms that were completed in respect of the above, if they were approved and by whom.*

There was an OSJA in place for this project.

### **Prisons (since 2015)**

I) *The number of NI-CO staff who have visited Bahrain, who they are, when they visited, and what they did in Bahrain.*

NI-CO experts have been working with Reform and Rehabilitation staff from Jau, Isa Town and Dry Dock from the start of 2015 to February 2016.

II) *The number of Bahraini officials who have visited the UK, who they are, when they visited, what they did in the UK.*

There were two visits by Bahraini officials to the UK

III) *The number of IPAB and OSJA forms that were completed in respect of the above, if they were approved and by whom.*

There was an OSJA in place for this project.

### **C&C support (since 2016)**

I) *The number of NI-CO staff who have visited Bahrain, who they are, when they visited, and what they did in Bahrain.*

No NI-CO staff have visited Bahrain and no future visits are planned as the project didn't start.

II) *The number of Bahraini officials who have visited the UK, who they are, when they visited, what they did in the UK.*

No visits to the UK have taken place and no future visits are planned as the project didn't start.

III) *The number of IPAB and OSJA forms that were completed in respect of the above, if they were approved and by whom.*

There was an OSJA in place for this project but no IPAB submissions were necessary.

*In respect of project 'c' only (C&C support), please provide a project summary.*

The project did not start.

*I am aware that NI-CO personnel have worked with Bahraini officials from Jau, Hidd, Isa Town and Dry Dock custodial facilities and I expect your disclosure to include these liaisons.*

Training has been delivered at Isa Town Juvenile Detention Centre.

The information on which UK bodies or individuals are providing the support or training for the concerned projects, which Bahraini bodies or individuals are receiving the support or training for the concerned projects and the work carried out with Bahraini officials from Jau, Hidd, Isa Town and Dry Dock custodial facilities is exempt under section 27 (1) (a) and (c) and section 43 (2) of the Freedom of Information Act.

The use of these exemptions was carefully considered.

Section 43(2) of the Act relates to commercial interests. The factors in favour of disclosure of this information includes the general public interest in the disclosure of commercial information to ensure effective, open and honest use of public money and the scrutiny of public licensing in accordance with published policy and to provide an environment where business can better respond to government opportunities.

These factors were carefully weighed against the need to allow business-people and commercial organisations the space to conduct their lawful business competitively and without fear of disclosure of sensitive commercial information. We consider that this transparency also poses risks to the protection of commercially confidential information. Failure to protect such commercially sensitive information would limit the sources of information and interlocutors available to the FCO and limit the FCO's ability to promote the British economy and lobby for the interests of British businesses overseas. In this case after such consideration we believe that the public interest in withholding the redacted information outweighs the public interest in its release.

Section 27(1)(a) and (c) of the FOIA recognises the need to protect information that would be likely to prejudice relations between the United Kingdom and other states and the interests of the UK abroad if it was disclosed. The application of s.27(1)(a) and (c) requires us to consider the public interest test arguments in favour of releasing and withholding the information. We acknowledge that disclosure could meet the public interest in transparency and accountability. Indeed, we are transparent about the UK government's support to Bahrain's reform programme – it is detailed in the FCO's human rights report, which is updated annually, and through public correspondence and parliamentary questions.

However, the effective conduct of international relations depends upon maintaining trust and confidence between governments. If the UK does not maintain this trust and confidence, its ability to protect and promote UK interest through intentional relations will be hampered, which will not be in the public interest. The disclosure of the project evaluations could

potentially damage the bilateral relationship between the UK and Bahrain. This would reduce the UK government's ability to protect and promote UK interests, which would not be in the public interest. For these reasons we consider that, the public interest in maintaining this exemption outweighs the public interest in disclosing it.

Some of the withheld information is personal data relating to third parties. It is our view that disclosure of this information would breach the first data protection principle, which states that personal data should be processed fairly and lawfully. Section 40(2) and (3) of the Freedom of Information Act therefore apply. It is the fairness aspect of this principle which we think would be breached by disclosure in this case. In such circumstances section 40 confers an absolute exemption on disclosure. We do not therefore have to apply the public interest test.

Once an FOI request is answered, it is considered to be in the public domain. To promote transparency, we may now publish the response and any material released on [gov.uk](http://gov.uk) in the [FOI releases](#) section. All personal information in the letter will be removed before publishing.

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Yours sincerely,

Head of Arabian Peninsula and Iran Department



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