



Foreign &  
Commonwealth  
Office

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19 July 2017

**FREEDOM OF INFORMATION ACT 2000 REQUEST: Ref 0303-17**

Thank you for your email of 24 March asking for information under the Freedom of Information Act (FOIA) 2000. You asked;

*These requests for one year's worth of the same information were not rejected (as my initial request for 1 year of data was), and the purpose of the meetings was also not redacted. It is unreasonable that less information was given for this request, and that the purpose of the meeting column was redacted.*

*I request that the information be released without redaction, and for the table to be extended up to December 2016, in line with the same level of transparency shown in FOIA releases 1149-15 and 1050-14.*

Your original request under FOI 0007-17 sought information over a period of one year. Although we have responded in previous years to similar requests (FOI 1149-15 and 1050-14) that covered a one year period, each FOI request is dealt with individually and independently of any previous requests on the same lines. In this instance, it was deemed that the cost of locating, retrieving and extracting the requested information for one year would exceed the appropriate limit and you agreed to limit the scope to information from January to June 2017 before we accepted the request.

Furthermore, information provided in responses under FOI 1050-14 and 1149-15 were assessed under different political climates, sensitivities and circumstances at the time of release. The response to FOI 0007-17 assessed that exemptions applied in the current circumstances and that release of this information, could damage bilateral relations between the UK and Bahrain and for this reason, information has been withheld.

In respect to your request to extend the list of information on meetings held during 2016 for the latter half of the year, we have completed a search of the electronic diaries and meeting records that we hold to cover the period of August–December 2016. You should be aware that we do not hold records of every meeting or encounter and therefore this list may not be exhaustive. The relevant information that we do hold and can release to you is attached as a digest.

Information is being withheld under Section 27 (International Relations), Section 38 (Health and Safety) and Section 40 (Personal Information) of the FOIA .

Section 27(1)(a) International relations, has been applied as disclosure of information would likely prejudice the relationship between the United Kingdom and Bahrain. Release of information relating to meetings held with Bahraini NGOs and opposition figures during this timeframe 1 August – 31 December 2016 could harm our relations with Bahrain.

The application of section 27(1)(a) requires us to consider the public interest test arguments in favour of releasing and withholding the information. We acknowledge that releasing information on this issue would increase public knowledge about our relations with Bahrain. Section 27(1)(a) recognises that the effective conduct of international relations depends upon maintaining trust and confidence between States. The disclosure of information detailing our relationship with Bahraini NGOs and opposition figures 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 through its relations with Bahrain, 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 the information.

In addition some of the information you requested has been withheld as it falls under Section 38 (1) (a) and (b) – information that would endanger the physical or mental health of any individual or endanger the safety of any individual. Section 38 is a qualified exemption and as such a public interest test had to be applied.

We recognise that there is a public interest in transparent and open government, and releasing information that would inform public debate on our work and demonstrate openness in the FCO's dealings with Bahraini organisations. We understand that it is often felt that we should not protect the names of our officers acting in an official capacity. However, we have to balance this with the need to ensure that our staff are able to carry out their jobs without fear of undue repercussions and, as their employer, we have a duty of care to ensure that they are not individually targeted for protecting and promoting UK interests in Bahrain. Disclosure of the specific details of the location of meetings might expose the participants to significant risk to their personal safety.

In this case we believe that the public interest in maintaining this exemption outweighs the public interest in release.

I also wish to advise you that some of the information you requested has been withheld as it falls under Section 40 – Personal information of the Freedom of Information Act (FOIA). The nature of your request means that the information found contains personal data relating to living 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 Section 40 of the Act confers an absolute exemption on disclosure. There is therefore no public interest test to apply.

Yours sincerely,

Head of Arabian Peninsula and Iran Department



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