

07 June 2017

Ref: FOI2017/08306

Freedom of Information Act 2000: HM Treasury consultation

Thank you for your Freedom of Information enquiry of 6th April 2017.

You asked for the following information:

"1. Responses received to the December 2016 consultation on 'The process for imposing monetary penalties for breaches of financial sanctions'. Specifically, we seek the responses identified at pages 41-42 of the April 2017 consultation response document with the exception of the following:

- Association of British Insurers*
- Institute of Chartered Accountants in England and Wales*
- The Law Society*
- Sanctions Practitioners Group*

2. Minutes of the meetings of the 11 roundtable events and meetings held by Treasury officials with representatives from the nine sectors identified at page 43 of the April 2017 consultation response.

3. Your confirmation that no other responses to the consultation were received, and no other roundtable events and meetings were held in connection with the consultation, beyond those identified at pages 41-43 of the consultation response document."

I can confirm that HM Treasury does hold information within the scope of the first part of your request and this information is attached.

We are withholding details of the companies who submitted each response under section 35(1)(a) (development of government policy) of the Freedom of Information Act 2000 (the Act). This is a qualified exemption and we are required to balance the public interest between disclosure and non-disclosure.

In relation to the release of this information, we recognise that there is an inherent public interest in transparency and accountability of public authorities. We also recognise the broad public interest in furthering public understanding of the issues which public authorities deal with. There is a clear public interest in the work of Government departments being transparent and open to scrutiny to increase diligence. Indeed, we are releasing the vast majority of the information requested in this case.

Balanced against this, as an economics and finance ministry HM Treasury relies on information provided by a range of stakeholders to better understand the impact of economic policy proposals on different sectors. Engagement and feedback with representatives of different industries is central to good policy decision making. We consider that the release of this information at this time would jeopardise those stakeholders' continued engagement with the Treasury which would not be in the public interest. A list of those who responded can be found on the consultation response document itself:

<https://www.gov.uk/government/consultations/the-process-for-imposing-monetary-penalties-for-breaches-of-financial-sanctions>

We believe the public interest falls in favour of withholding the small amount of information.

We have also redacted personal information, including names and contact details, under section 40 (personal data) of the Act. Section 40 exempts personal information from disclosure if its release would contravene one of the Data Protection principles. In this case, disclosure of the information would contravene the first Data Protection principle which states that personal information must be processed fairly and lawfully.

We do not hold information in scope of the second part of your request.

In relation to the third part of your request; as stated in the consultation response document there were 34 responses to the consultation, however 33 were listed at Annex B in the consultation response. HSBC's name was omitted from the list in error; the document has now been updated with their name added. Treasury staff met with HSBC, at their request, to talk through their consultation response before they submitted it.

One further response was received after the deadline, without prior notification that it would be delayed, and was therefore not included in the consultation process.

If you have any queries about this letter, please contact us. Please quote the reference number above in any future communications.

Yours sincerely

Information Rights Unit

Enclosure(s):
30 Consultation responses