



Foreign &
Commonwealth
Office

Human Resources Directorate
Foreign and Commonwealth Office
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Website: <https://www.gov.uk>

16 May 2018

FREEDOM OF INFORMATION ACT 2000 REQUEST REF: 0429-18

Thank you for your email of 19 April 2018 asking for information under the Freedom of Information Act (FOIA) 2000. You asked:

You state that: of the 52 applications since 1 January 2014, all were approved: 3 were approved unconditionally, and 49 approved subject to conditions. But that the information I have requested in question 2 has been withheld as it could not allow individuals to be identified. Could you advise if there is a way to answer question 2 in a way that does not allow for individual identification. For example, of the 52 applications could you confirm the list of companies and organisations they joined? If not, could you confirm how many of these organisations are private sector defence and security companies, and how many for consultancies including PR and lobbying consultancies?

Furthermore, I'd be grateful if you could confirm how the FCO monitors former employees' compliance with conditions attached to approvals? Have any former employees have been sanctioned for breach of these conditions?

I am writing to confirm that we have now completed the search for the information which you requested.

I can confirm that the Foreign and Commonwealth Office (FCO) does hold information relevant to your request.

Applications by FCO staff below SCS1 seeking approval for a new outside appointment or employment since 1 January 2014 have been for the following: consumer goods companies; education providers; energy companies; financial services companies; EU, UN and other multilateral organisations; foreign governments; ICT companies; management consultancies; NGOs; organisations in the aerospace, automotive and railway industries; think tanks; and self-employed consultancy work.

The list of named organisations and number of organisations in each sector have been withheld as this could allow individuals to be identified. It is our view that disclosure 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.

The FCO administers business appointments in accordance with the Civil Service Management Code. Any breach by an employee of the standards of conduct required under the Civil Service Code can result in disciplinary action. It is our view that disclosing whether any former employees have been sanctioned for breach of these conditions would contravene one of the data protection principles. Therefore this information is also subject to Section 40(2) and (3) of the FOI Act, as outlined above.

Yours sincerely,

Human Resources Directorate



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.