Dear [Name],

I am writing regarding your FOI request about DSEI 2015 and your complaint to the Information Commissioner. Following discussions with the Information Commissioner’s office the Department has looked again at your request and have concluded that we can provide some of the previously withheld information. Some information remains withheld as explained below.

You requested the following information:
I would like a list of the meetings and functions related to DSEI 2015 that were attended by senior UKTI DSO staff. These staff are identified using the UKTI DO Contact Diary 2015:

Stephen Phipson, Head
Chief of Staff

Simon Cholerton, Operations Director

Nigel Maddox, Senior Military Adviser

Alexis Hammer, Regional Director Americas, Pacific and East Asia

Sophie Lane, Regional Director, Africa, Europe, Middle East, Central and South East Asia

Assistant Director, Europe and Central Asia

Assistant Director, India and Africa

Assistant Director, Middle East

Chief of staff, Typhoon Team

I would like the request to cover the event itself and a period of a week either side of the event, i.e. from 7th to 25th September, inclusive. I do not need meetings which comprised of only UKTI DSO Staff.

For each member of staff, please provide a list of their meetings/functions and include:
- the date, length and location of each meeting/function
- a list of all those present (with names and positions for politicians and senior officials, and positions for those to whom Section 40 exemptions are applied)
- and the purpose of the meeting”

The attached table has been compiled using the 2015 Defence and Security Equipment International event diary along with the diaries of the staff listed in your request for which we hold details. In some cases the diary entry does not include all the information you requested and where this is the case "Not recorded" has been noted in the table. Also these entries were
planned and may or may not have actually taken place. Whenever meetings are known not to have happened or where representatives were confirmed as not attending they have been removed from the list as not in scope.

The following exemptions apply in some cases:

Section 27 sub sections (1)(a) and (1)(c) of the Freedom of Information Act exempts information if its disclosure under the Act would, or would be likely to, prejudice relations between the UK and any other state or the interest of the UK abroad. It is a qualified exemption and we have considered the public interest test arguments.

We acknowledge there is a public interest in the Department whenever possible providing transparency about its engagement with Overseas Governments and the release of this information may increase public knowledge of the UK’s diplomatic relations. However, against this it can be argued that the effective conduct of any international relationship depends upon maintaining the trust and confidence of Government of other nations. Many overseas Government customers view defence and security acquisitions as a key strand of a wider bilateral relationship and the Governments role in supporting UK exporters is therefore often seen as one of the pillars of trust upon which wider relationships are built. Disclosure of information regarding individual delegates who attended DSEI from specific countries and details of the purpose of the meetings they were involved in could or would be likely to prejudice the UK’s relationship with the countries concerned. This would not be in the public interest. For this reason, we believe that the public interest in withholding this information outweighs the public interest in disclosing it.

Section 40(2) (Personal Information) provides an absolute exemption for personal data which then falls to be dealt with under the Data Protection Act. Personal data of third parties can only be disclosed in accordance with the data protection principles. In particular, the first data protection principle requires that the disclosure must be fair and lawful, and must comply with one of the conditions in schedule 2 of the Data Protection Act. The names and positions of civil servants, company employees and overseas Government representatives, together with information concerning their employer constitute personal data from which individuals may be identified. We believe it is fair to disclose the names and positions of UK Ministers and senior civil servants and these have been included in the table. We do not think that it is fair to release the names of junior members of staff or company employees and do not think that any of the relevant conditions apply.

The personal information of overseas Government representatives has also been withheld where disclosure also engages S27.

Section 43(2) (Commercial information) exempts information if it’s disclosure could or would be likely to prejudice the commercial interests of any person. It is a qualified exemption and we have considered the public interest arguments.

We recognise that there is a general public interest in the disclosure of information as greater transparency makes Government more accountable. Against this there is a public interest in ensuring that the commercial interest of external business are not damaged or undermined by disclosure of information which is not common knowledge and which could adversely impact on future business. In this case, disclosure of information about the purpose of meetings between companies and overseas Government representatives would prejudice the commercial interest of the companies involved as the information concerned is market sensitive and could potentially be used by competitors. Disclosure would therefore not be in the public interest.
**Future FOI requests**

The Department recognises your right to request information in accordance with the FOI Act and wishes to remain as transparent as possible about its role and the work it does with the UK Defence and Security Industries. The sort of events you make FOI requests about including not just DSEI, but Farnborough Air Show and the Security & Policing Exhibition are all announced in advance and published on .Gov.uk and their own individual web sites. Meetings that take place at these events are subject to change and the frequent requests you make place a substantial burden on the Department as each request necessitates the need to contact a wide range of 3rd parties to seek views about the sensitivity of information in order for the Department to make an informed decision on the balance of public interest with regard to disclosure. The Department may consider the use of S14 (1) (vexatious requests) for future requests of this nature as it is not tenable for the organisation to continue to process such time consuming requests.

The Department recognises its duty under S16 of the Act to provide advice and assistance to requesters. You may like to consider refining any future requests to information about meetings between one specific member of DSO and a particular third party or information concerning a specific issue of interest.

A copy of this letter and the disclosed information will be sent to the Information Commissioner’s Office.

Yours sincerely,

**Defence & Security Organisation**
Dear [Redacted],

I am writing regarding your FOI request about DSEI 2015 and your complaint to the Information Commissioner’s Office.

Following our letter of 15 March 2017 which included disclosure of information, the Information Commissioner’s Office has contacted us again concerning information withheld in accordance with Section 40(2) of the Act. In light of discussions with the ICO, the Department has looked again at the withheld information and has concluded that some previously withheld information regarding the names of senior company representatives can now be disclosed.

A revised spreadsheet including this information is attached.

A copy of this letter and the disclosed information will be sent to the Information Commissioner’s Office.

Yours sincerely,

Defence & Security Organisation