



Department  
for Exiting the  
European Union

Freedom of Information Team  
Correspondence Unit  
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[www.gov.uk](http://www.gov.uk)

Vicky Cann  
Via: request-445805-4e42c41c@whatdotheyknow.com

Our ref: DEX001216

06 August 2018

Dear Vicky Cann,

I refer to your request, where you asked:

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I would like to request the minutes of the following meetings, plus a list of who attended each one. This information is taken from DEXEU's list of meetings and I assume that TheCityUK, City UK, and The City UK all refer to the same organisation.

1. Robin Walker Sep-17 TheCityUK
  2. Robin Walker Sep-17 UK Finance
  3. Robin Walker Oct-16 City UK
  4. Rt Hon David Davis MP Oct-16 CityUK
  5. Rt Hon David Jones MP Feb-17 The City UK
  6. Robin Walker MP Feb-17 The City UK
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I can confirm that the Department for Exiting the European Union (DExEU) holds some information relevant to your request. Each question has been taken in turn. We have dealt with this request under the Freedom of Information Act 2000 (the "Act").

**1. Robin Walker, 6th September 2017 TheCityUK**

Minutes: This information is held by DExEU. The information is exempt under section 27 and section 35 of the Act. Full exemptions can be found at the end of this answer.

Attendees and the organisation they represented at the time of the meeting:

Gary Campkin, Director of Policy and Strategy at TheCityUK  
Miles Celic, Chief Executive Officer, TheCityUK  
Paul Manduca, Chairman of the Advisory Council, TheCityUK  
John McFarlane, Chairman, TheCityUK

Marcus Scott, Chief Operating Officer, TheCityUK  
Edward Braham, Managing Partner at Freshfields Bruckhaus Deringer  
Donald Brydon, Chairman of the London Stock Exchange Group and the  
Nomination Committee  
[Section 40], Thomson Reuters  
Sir Howard Davies, Chairman at the Royal Bank of Scotland  
Ludovic de Montille, Chairman of BNP Paribas Group  
Huw Evans, Director General of the Association of British Industry (ABI)  
Douglas Flint, Group Chairman of HSBC Holdings plc  
Sir Gerry Grimstone, Chairman at Standard Life Aberdeen Plc  
Mark Hoban, Chairman of Flood Re  
Alan Houmann, Managing Director - Government Affairs (EMEA) of Citi  
Stephen Jones, Chief Executive of UK Finance  
Catherine McGuinness, Chairman of the Policy and Resources Committee  
at the City of London Corporation.  
Nick Owen, Chairman of Deloitte  
James Palmer, Chairman and Senior Partner at Herbert Smith Freehills  
LLP  
David Peniket, President of Intercontinental Exchange Futures Europe  
(ICE)  
Malcolm Sweeting, Senior Partner at Clifford Chance LLP  
Shriti Vadera, Chairman at Santander UK Plc

**2. Robin Walker, Sep-17, UK Finance**

Minutes: This information is not held by DExEU.

Attendees and the organisation they represented at the time of the meeting:

Bob Wigley, Chair of UK Finance  
Stephen Jones, CEO of UK Finance  
Rebecca Parks, Head of External Affairs and Communications

**3, 4. Rt Hon David Davis MP and Robin Walker MP, Oct-16, TheCityUK**

Minutes: This information is not held by DExEU.

Attendees and the organisation they represented at the time of the meeting:

John McFarlane, TheCityUK  
Miles Celic, TheCityUK

**5, 6. Rt Hon David Jones MP and Robin Walker MP, Feb-17, The City UK**

Minutes: This information is not held by DExEU.

Attendees and the organisation they represented at the time of the meeting:

Miles Celic, TheCityUK

**Section 35**

Some of the information requested is being withheld as exempt under Section 35(1)(a) of the Act, which protects information held by a government department if its release would prejudice the formulation or development of government policy.

Section 35 is a qualified exemption and I have considered whether the public interest in exempting the information in scope outweighs the public interest in releasing the information. In favour of disclosure, DExEU recognises the importance of transparency in public affairs to ensure the public are able to scrutinise the manner in which authorities reach important decisions. Particular to this exemption we also recognise that policy formulation and development is in the public interest as policy can have significant impact on the lives of citizens and there is therefore public interest in the transparency of any deliberations.

Against this, there is a strong public interest in policy making associated with our exit from the EU being of the highest quality and being fully informed by a consideration of all options. It is vital within negotiations that there can be the exchange of views on available options/scenarios freely and openly, and that these can be discussed and potential implications understood, especially on live issues. To be of value, the advice and options presented to Ministers must be frank and free from fear that it could be released to the wider public inappropriately, prior to the decisions being made. The ICO recognises that it “is not only Ministers who are involved in making government policy” but also “Civil servants – and, increasingly, external experts and stakeholders”. In releasing information in scope, we may undermine the effective formulation or development of policies now and indeed in the future, which have been and will continue to be key to our negotiation and implementation strategy. The release of this information could set an unwanted precedent and jeopardise the confidential environment necessary for optimal policy development.

I have therefore determined that in all circumstances of the case, public interest favours withholding the information we hold within the scope of your request over releasing.

## **Section 27**

Some of the information in scope of your request is being withheld as exempt under section 27(1)(c-d) of the Act, which exempts information from release if to do so would, or would be likely to, prejudice: (c) the interests of the UK abroad, or; (d) the promotion or protection by the UK of its interests abroad.

Section 27 is a qualified exemption and I have considered whether the balance of the public interest favours releasing or withholding this material. DExEU recognises there is a general public interest in openness in public affairs to ensure that the public are able to scrutinise the manner in which public authorities reach important decisions, notably around our exit from the EU.

Opposing this, we have taken into account that there is a substantial public interest in the government being able to properly evaluate their approach to foreign policy, and in doing so, being able to successfully pursue our national interests abroad. Following the formal notification from the UK of its intention to withdraw from the EU, we find that avoiding disclosure of any documentation which is likely to prejudice the promotion or protection by the UK of its interests in the context of the withdrawal negotiations, is in the public interest. In addition, there is a strong public interest in the protection of any information which may give insight to/undermine the UK's negotiations with the EU or adversely affect the UK's

national interests. Taking into account all the circumstances of this case, I have concluded that the public interest favours withholding the information we hold within the scope of your request.

#### **Section 40**

Some of the information you have requested is exempt from disclosure under section 40(2) of the Act. This section exempts personal information from disclosure if that information relates to someone other than the applicant, and if disclosure of that information would, amongst other things, contravene one of the principles relating to processing of personal data in Article 5(1) of the General Data Protection Regulation ('the GDPR'). In this case, DExEU considers that disclosure would contravene the first data protection principle contained in Article 5(1)(a) of the GDPR, which provides that personal data must be processed lawfully, fairly and in a transparent manner. Section 40(2) is an absolute exemption and the DExEU is not obliged to consider whether the public interest favours disclosing the information.

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

If you are unhappy with the service you have received in relation to your request or wish to request an internal review, you should write to [foi@dex.eu.gov.uk](mailto:foi@dex.eu.gov.uk) or:

Freedom of Information Team (internal review)  
Department for Exiting the European Union  
9 Downing Street  
SW1A 2AG

You should note that DExEU will not normally accept an application for internal review if it is received more than two months after the date that the reply was issued.

If you are not content with the outcome of your internal review, you may apply directly to the Information Commissioner for a decision. Generally, the Commissioner cannot make a decision unless you have exhausted the complaints procedure provided by DExEU. The Information Commissioner can be contacted at:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Yours sincerely,

**Freedom of Information Team, DExEU.**