Foreign, Commonwealth & Development Office

Information Rights Unit
Foreign, Commonwealth and Development Office
WG.75
King Charles Street
London
SW1A 2AH

Email: information.rights@fcdo.gov.uk

www.gov.uk/fcdo

Anna Stavrianakis
[redacted]

5th March 2024

Dear Anna Stavrianakis

SUBECT ACCESS REQUEST (SAR) REF NO: DPR2023/23297

Thank you for your letter of 28 November to the Foreign, Commonwealth and Development Office (FCDO) in which you made a subject access request under the General Data Protection Regulation 2018 (GDPR) as supplemented by the Data Protection Act 2018 (DPA).

You requested:

Under the Data Protection Act 2018, I am writing to ask for the release of all the personal information that FCDO holds about me. Please send me the following information held by you about me:

Any records or research notes written on or about me

Any correspondence between FCDO officials that includes reference to me

Any correspondence between FCDO officials and the other government departments involved in arms export licensing (MoD, DBT) that includes reference to me

Any correspondence between FCDO officials and politicians, including ministers, legal advisors, and anyone else otherwise involved in arms export licensing, that includes reference to me

By correspondence I mean emails and reports, memos, notes written in electronic or hard copy, as well as WhatsApp or Signal messages, communication via chat groups, instant messaging or any other means of communication.

since 1 September 2022

I can confirm that the Foreign, Commonwealth and Development Office holds information relevant to your request - I am enclosing a copy of that information. You should be aware that some of the information we hold relates to third parties. We

consider that releasing this information to you would constitute a breach of the GDPR/DPA and we have therefore redacted it. We do not hold any further information to which you are entitled under the above legislation other than that which has been released to you.

Please refer to our Personal Information Charter and Privacy Notices on gov.uk for supplementary information on how the FCDO handles personal data.

If you would like a review of our decision, please write to Information Rights Unit, Foreign, Commonwealth & Development Office, Room WG.75, King Charles Street, London, SW1A 2AH. Email:information.rights@fcdo.gov.uk Please note you have 40 working days to do so from the date of this letter.

You can apply directly to the Information Commissioner. However, the Information Commissioner will not normally make a decision unless you have first exhausted the complaints procedure provided by the FCDO. The Information Commissioner can be contacted at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF, or online at https://ico.org.uk/make-a-complaint/
Yours sincerely,

Information Rights Unit

October 2022



House of Commons

Committees on Arms Export Controls

Developments in UK Strategic Export Controls

First Joint Report of Session 2022–23

Fourth Report of the Defence Committee, Fourth Report of the Foreign Affairs Committee, Fourth Report of the International Development Committee and Fifth Report of the International Trade Committee

Report, together with formal minutes relating to the report

Ordered by the House of Commons to be printed 19 October 2022

House of Commons Committees on Arms Export Controls

Developments in UK Strategic Export Controls Report

Developments in UK Strategic Export Controls (parliament.uk)

Page 12

20. Despite the Government's commitments, concerns continue about the content and transparency of the annual report and licensing data. Professor Anna Stavrianakis, Professor of International Relations at the University of Sussex, wanted to see greater transparency in the provision of statistical information on open individual export licences [OIEL][30]. She called for information to be published on the financial value, end user and the type of equipment transferred, rather than just the number of transactions undertaken under such licences, as was currently available.[31] She also wished to see more detailed and meaningful explanations of how policy decisions were arrived at, especially where they had been controversial.[32]

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31 Professor Anna Stavrianakis (UKA0002)

32 Professor Anna Stavrianakis (UKA0002)

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46. There was immediate critical reaction to the new criteria.[78] Professor Anna Stavrianakis commented:

78 Professor Anna Stavrianakis, Missing in action: UK arms export controls during war and armed conflict, World Peace Foundation, March 2022, p 14; see also 'New rules on UK arms trade make it 'easier' to sideline human rights', The Guardian, 21 December 2021; and also Control Arms UK (UKA0017)

Page 20

A key amendment was the insertion of the phrase "if it [the Government] determines" to the risk assessment in Criteria 2, 3, 4 and 6. This weakens the effectiveness of controls significantly by giving government free rein to ignore inconvenient evidence and narrowing the scope for future legal challenges–both of which have been core features of the controversy over arms exports to the Saudi-led coalition involved in the war in Yemen.[79]

79 Professor Anna Stavrianakis, Missing in action: UK arms export controls during war and armed conflict, World Peace Foundation, March 2022, p 14

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Published written evidence

The following written evidence was received and can be viewed on the inquiry publications page of the Committee's website. UKA numbers are generated by the evidence processing system and so may not be complete

16 Stavrianakis, Professor Anna (Professor of International Relations, University of Sussex) (UKA0002)

Strategic Export Controls Annual Reports

[Professor Anna Stavrianakis] called for greater transparency in the provision of statistical information on OIELs ie the financial value, end user and the type of equipment transferred, rather than just the number of transactions undertaken under such licences.

- She also wished to see more detailed and meaningful explanations of how policy decisions were arrived at, especially where they had been controversial.

January 2023

From: [REDACTED]

Sent: **Tuesday, January 24, 2023 10:57 AM**

To: [REDACTED]

Subject: **RE: NEW FOI2023/00702: Anna Stavrianakis - UK arms export licensing policy – KSA**

[REDACTED] we need to look at this closely in the context of previous FOIs from Anna [REDACTED] [REDACTED] Anna successfully appealed an FOI response in 2019.

[REDACTED]

CAEC Inquiry - Dr Stavrianakis [REDACTED] email attachment

- FOI 0706-17 Response.pdf

CAEC Inquiry - Dr Stavrianakis [REDACTED] email attachment

From: [REDACTED]

Sent: Thursday, February 4, 2021 16:59 PM

To: [REDACTED]

Cc: [REDACTED]

Subject: **CAEC Inquiry - Dr Stavrianakis** [REDACTED]

[REDACTED] On Tuesday, the CAEC heard evidence from Professor Anna Stavrianakis (Professor of International Relations, University of Sussex) [REDACTED]

It was [REDACTED] dominated by Dr Stavrianakis who was very critical of the Govt [REDACTED]. You may recall in 2019 Dr Stavrianakis successfully appealed an FOI document [REDACTED]

Annual Report - Dr Stavrianakis says it allows us a general overview of licensing but would like a report in more granular detail. [REDACTED]

- **DFID/FCDO merger** - Dr Stavrianakis concerned about merger of DFID and FCDO – concerned no move of DFID officials into ECJU and that there has been no change. Wants the CAEC to ask the Govt that if no DFID officials have moved, how do they actually share info around any development concerns? i.e. in a place like Yemen. Dr Stavrianakis argued FCDO now has a legal obligation to take DFID reports and info into account when making decisions so interested to know how joined up.

- **Mills Report -** [REDACTED]. Dr Stavrianakis said one positive development is that Govt confirmed publically it has a revised methodology and now takes into account past accounts of IHL into its risk assessment. However, she said there has been manoeuvring which allowed it to reach the conclusion it was OK to keep licensing weapons deliveries to Saudi and Coalition. Dr Stavrianakis claimed Govt is trying to choreograph public debate on this – and hides behind secret info.

- **Human Rights -** Dr Stavrianakis said Mills Review outcomes not too different to what was promised after Arab Spring. The solution in her view is a much more stricter approach in assessing licences. She said whilst we cannot predict the future, we should look better at character of regimes we are exporting equipment too. Implied that we should look at arms export like counter terrorism – proactive and pre-emptive approach which tries to act what will happen in the future.

- **US suspension of arms sales to Saudi Arabia** – Dr Stavrianakis says Raytheon USA is expecting a 500m bomb sale to fall through and that UK risks being out of step with allies.

- **Ministerial Decisions -** Dr Stavrianakis referenced the FOI request about PM when FS approving licences days after an attack on a food farm and says she is now happy more cases are being sent for Ministerial approval, but not convinced this will lead to better decisions.

- **Brexit -** Dr Stavrianakis said practicalities of Brexit are bad news for export controls. Said the UK is already an outlier in Europe on war in Yemen. [REDACTED]

  [REDACTED]

[REDACTED] Foreign, Commonwealth and Development Office

FOI 0706-17 Response.pdf 18 August 2017

Foreign & Commonwealth Office

Export Control Joint Unit
Foreign and Commonwealth Office
King Charles Street
London SW1A 2AH
Website: https://www.gov.uk

Dr Anna Stavrianakis
Senior Lecturer in International Relations
University of Sussex
Falmer
Brighton BN1 9SJ

By Email: A.Stavrianakis@sussex.ac.uk

18 August 2017

Dear Dr Stavrianakis

FREEDOM OF INFORMATION ACT 2000 REQUEST REF: 0706-17

Thank you for your email of 25 July asking for information under the Freedom of Information Act (FOIA) 2000. You asked:

I am writing to make a request under the Freedom of Information Act about the Export Controls Joint Unit (ECJU) and UK arms export licensing processes with regard to Saudi Arabia. In the period 1 July 2016 to 30 September 2016:

1) *How many times were concerns under Criterion 2 of the Consolidated EU and National Arms Export Licensing Criteria raised about exports of military technology and equipment to Saudi Arabia, by officials from which departments?*

2) *How many times was Saudi Arabia discussed at the weekly refusals meeting regarding arms export licences?*

3) *How many times were licensing decisions regarding Saudi Arabia referred to Ministers, and which Ministers were consulted?*

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.

During our case-by-case assessment of export licences we routinely consider whether any Criteria are engaged, and as part of this assessment we consider if any Criterion 2

risks apply. Between 1 July and 30 September 2016, FCO officials conducted Criterion 2 assessments on 27 applications to export military technology and equipment to Saudi Arabia.

During the same period, no export licence applications for Saudi Arabia were discussed at the weekly refusals meetings.

During the same period, licensing decisions regarding Saudi Arabia were referred to FCO Ministers twice; these decisions related to six export licence applications, and the Foreign Secretary was consulted on both occasions.

Once an FOI request is answered, it is considered to be in the public domain. To promote transparency, we may now publish the response and any material released on gov.uk in the FOI releases section. All personal information in the letter will be removed before publishing.

The information supplied to you continues to be protected by the Copyright, Designs and Patents Act 1988. You are free to use it for your own purposes, including any non-commercial research you are doing and for the purposes of news reporting. Any other re-use, for example commercial publication, would require the permission of the copyright holder. Most documents supplied by the FCO will have been produced by government officials and will be protected by Crown Copyright. To re-use Crown Copyright documents please consult the Open Government Licence v3 on the National Archives website.

Information you receive which is not subject to Crown Copyright continues to be protected by the copyright of the person, or organisation, from which the information originated. You must ensure that you gain their permission before reproducing any third party (non-Crown Copyright) information.

If you would like a review of our decision, or if you wish to make a complaint, please write to the FOI and DPA Team, Foreign and Commonwealth Office, Room K4.04, King Charles Street, London, SW1A 2AH. E-mail: foi-dpa.imd@fco.gov.uk . You have 40 working days to do so from the date of this letter.

You can apply directly to the Information Commissioner. However, the Information Commissioner will not normally make a decision unless you have first exhausted the complaints procedure provided by the FCO. The Information Commissioner can be contacted at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

Yours sincerely,

Export Control Joint Unit

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.

From: [REDACTED]

Sent: **Thursday, January 12, 2023 11:16 AM**

To: [REDACTED]

Cc: [REDACTED]

Subject: **FW: NEW FOI2023/00702: Anna Stavrianakis - UK arms export licensing policy - KSA**

[REDACTED]

We have another FOI from Anna.

[REDACTED]

I am writing to request information under the Freedom of Information Act in relation to UK arms export licensing policy and process with regard to Saudi Arabia in the period 1 October 2016 to 31 December 2016.

Between 1 October and 31 December 2016:

1. How many times, by officials from which teams or departments, and on what dates, were concerns under Criterion 2 of the Consolidated EU and National Arms Export Licensing Criteria raised by FCO officials about exports of military technology and equipment to Saudi Arabia in internal FCO deliberations?
2. How many times, and on what dates, were FCO concerns under Criterion 2 raised in inter-departmental deliberations with or via the Export Control Joint Unit?
3. How many times, and on what dates, were concerns under Criterion 2 raised with Ministers?
4. What guidance, if any, was issued to officials regarding the threshold of what constitutes a clear risk that weapons might be used in the commission of a serious violation of international humanitarian law? Please provide copies of the guidance.

[REDACTED]

From: [REDACTED]

Sent: Thursday, January 12, 2023 11:11 AM

To: [REDACTED]

Subject: **RE: NEW FOI2023/00702: Anna Stavrianakis - UK arms export licensing policy**

[REDACTED]. This is one of many we have had from **Anna Stavriankakis.**

[REDACTED]

From: Anna Stavrianakis <A.Stavrianakis@sussex.ac.uk>

Sent: **Wednesday, January 11, 2023 14:56 PM**

To: Information Rights (Sensitive) <information.rights@fcdo.gov.uk>

Subject: **FOI request**

Dear FCDO Information Rights Unit

I am writing to request information under the Freedom of Information Act in relation to UK arms export licensing policy and process with regard to Saudi Arabia in the period 1 October 2016 to 31 December 2016.

Between 1 October and 31 December 2016:

1. How many times, by officials from which teams or departments, and on what dates, were concerns under Criterion 2 of the Consolidated EU and National Arms Export Licensing Criteria raised by FCO officials about exports of military technology and equipment to Saudi Arabia in internal FCO deliberations?
2. How many times, and on what dates, were FCO concerns under Criterion 2 raised in inter-departmental deliberations with or via the Export Control Joint Unit?
3. How many times, and on what dates, were concerns under Criterion 2 raised with Ministers?
4. What guidance, if any, was issued to officials regarding the threshold of what constitutes a clear risk that weapons might be used in the commission of a serious violation of international humanitarian law? Please provide copies of the guidance.

Yours sincerely

Anna Stavrianakis

Anna Stavrianakis

Professor of International Relations

University of Sussex

Falmer

Brighton BN1 9SJ

February 2023

From: Information Rights Unit <no-reply@fcdo.ecase.co.uk>

Sent: **Wednesday, February 01, 2023 11:49 AM**

To: Anna Stavrianakis A.Stavrianakis@sussex.ac.uk

Subject: **FOI Request - Ref: [00702]**

Dear Anna Stavrianakis,

I am writing in response to your Freedom of Information request FOI2023/00702, received 11th January. Please find our response attached.

Yours sincerely,

Information Rights Unit

Foreign, Commonwealth & Development Office



Foreign, Commonwealth & Development Office

Information Rights Unit

WG.75

King Charles Street

London

SW1A 2AH

Email: information.rights@fcdo.gov.uk

www.gov.uk/fcdo

Anna Stavrianakis

1st February 2023

A.Stavrianakis@sussex.ac.uk

Dear Anna Stavrianakis

FREEDOM OF INFORMATION ACT 2000 - REQUEST REF: FOI2023/00702

Thank you for your email of 11th January asking for information under the Freedom of Information Act (FOIA) 2000. You asked:

I am writing to request information under the Freedom of Information Act in relation to UK arms export licensing policy and process with regard to Saudi Arabia in the period 1 October 2016 to 31 December 2016.

Between 1 October and 31 December 2016:

1. How many times, by officials from which teams or departments, and on what dates, were concerns under Criterion 2 of the Consolidated EU and National Arms Export Licensing Criteria raised by FCO officials about exports of military technology and equipment to Saudi Arabia in internal FCO deliberations?

2. How many times, and on what dates, were FCO concerns under Criterion 2 raised in inter-departmental deliberations with or via the Export Control Joint Unit?

3. How many times, and on what dates, were concerns under Criterion 2 raised with Ministers?

4. What guidance, if any, was issued to officials regarding the threshold of what constitutes a clear risk that weapons might be used in the commission of a serious violation of international humanitarian law? Please provide copies of the guidance.

I can confirm that the FCDO does hold information relevant to your request.

Section 12 of the Freedom of Information Act makes provision for public authorities to refuse requests for information where the cost of dealing with them would exceed the appropriate limit. The limit has been specified in the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004. For central government the appropriate limit is set at £600. This represents the estimated cost of one or more persons spending 3 ½ working days in determining whether the Department holds the information, and locating, retrieving and extracting it. Your request as presently formulated is widely-framed and I estimate that it will take more than 3 ½ working days to locate, retrieve and extract this information. In these circumstances we are not obliged under the Act to comply with your request. You may therefore wish to refine your request to narrow its scope to bring it within the appropriate limit.

You may wish to refine your request by reducing the number and the scope of your questions.

Please note that any new request will be given a separate reference number and we will then consider whether we can provide the information requested within the appropriate cost limit. This would of course be subject to the consideration of whether any of the other exemptions under the FOI Act apply.

If you would like a review of our decision, please write to Information Rights Unit, Foreign, Commonwealth & Development Office, Room WG.75, King Charles Street, London, SW1A 2AH. Email:information.rights@fcdo.gov.uk Please note you have 40 working days to do so from the date of this letter.

You can apply directly to the Information Commissioner. However, the Information Commissioner will not normally make a decision unless you have first exhausted the complaints procedure provided by the FCDO. The Information Commissioner can be contacted at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF, or online at https://ico.org.uk/make-a-complaint/

Yours sincerely,

Information Rights Unit

For information about how the FCDO handles personal information please see our Personal Information Charter

From: Anna Stavrianakis <A.Stavrianakis@sussex.ac.uk>

Sent: **Wednesday, February 8, 2023 12:01 PM**

To: Information Rights (Sensitive) <information.rights@fcdo.gov.uk>

Cc: Anna Stavrianakis <A.Stavrianakis@sussex.ac.uk>

Subject: **RE: FOI Request - Ref: [00702]**

Dear Information Rights Unit

Thank you for your correspondence of 1 February 2023 re: request FOI2023/00702.

I am writing to refine my request to narrow its scope to bring it within the appropriate cost limit. I have narrowed the time period in which I am seeking information and reduced the number of questions.

Between 1 October and 31 October 2016:

1. How many times, by officials from which teams or departments, and on what dates, were concerns under Criterion 2 of the Consolidated EU and National Arms Export Licensing Criteria raised by FCO officials about exports of military technology and equipment to Saudi Arabia in internal FCO deliberations?

2. How many times, and on what dates, were FCO concerns under Criterion 2 raised in interdepartmental deliberations with or via the Export Control Joint Unit?

3. How many times, and on what dates, were concerns under Criterion 2 raised with Ministers in the departments responsible for arms export licensing decision making?

Yours sincerely

Anna Stavrianakis

From: Information Rights Unit <no-reply@fcdo.ecase.co.uk>

Sent: **Wednesday, February 01, 2023 11:49 AM**

To: Anna Stavrianakis A.Stavrianakis@sussex.ac.uk

Subject: **FOI Request - Ref: [00702]**

Dear Anna Stavrianakis,

I am writing in response to your Freedom of Information request FOI2023/00702, received 11th January. Please find our response attached.

Yours sincerely,

Information Rights Unit

Foreign, Commonwealth & Development Office

From: Anna Stavrianakis <A.Stavrianakis@sussex.ac.uk>

Sent: **Wednesday, February 8, 2023 12:01 PM**

To: Information Rights (Sensitive) <information.rights@fcdo.gov.uk>

Cc: Anna Stavrianakis <A.Stavrianakis@sussex.ac.uk>

Subject: **RE: FOI Request - Ref: [00702]**

Dear Information Rights Unit

Thank you for your correspondence of 1 February 2023 re: request FOI2023/00702.

I am writing to refine my request to narrow its scope to bring it within the appropriate cost limit. I have narrowed the time period in which I am seeking information and reduced the number of questions.

Between 1 October and 31 October 2016:

1. How many times, by officials from which teams or departments, and on what dates, were concerns under Criterion 2 of the Consolidated EU and National Arms Export Licensing Criteria raised by FCO officials about exports of military technology and equipment to Saudi Arabia in internal FCO deliberations?

2. How many times, and on what dates, were FCO concerns under Criterion 2 raised in interdepartmental deliberations with or via the Export Control Joint Unit?

3. How many times, and on what dates, were concerns under Criterion 2 raised with Ministers in the departments responsible for arms export licensing decision making?

Yours sincerely

Anna Stavrianakis

From: Information Rights Unit <no-reply@fcdo.ecase.co.uk>

Sent: **Thursday, February 23, 2023 15:06**

To: Anna Stavrianakis <A.Stavrianakis@sussex.ac.uk>

Subject: **FOI Request - Ref: [02744]**

Dear Anna Stavrianakis,

I am writing in response to your Freedom of Information request FOI2023/02744, received 8th February. Please find our response attached.

Yours sincerely,

Information Rights Unit

Foreign, Commonwealth & Development Office

ATTACHMENT:

02744 Response Letter.pdf



Foreign, Commonwealth & Development Office

Information Rights Unit

WG.75

King Charles Street

London

SW1A 2AH

Email: information.rights@fcdo.gov.uk

www.gov.uk/fcdo

Anna Stavrianakis

22nd February 2023

A.Stavrianakis@sussex.ac.uk

Dear Anna Stavrianakis

FREEDOM OF INFORMATION ACT 2000 - REQUEST REF: FOI2023/02744

Thank you for your email of 8th February asking for information under the Freedom of Information Act (FOIA) 2000. You asked:

I am writing to refine my request to narrow its scope to bring it within the appropriate cost limit. I have narrowed the time period in which I am seeking information and reduced the number of questions.

Between 1 October and 31 October 2016:

1. How many times, by officials from which teams or departments, and on what dates, were concerns under Criterion 2 of the Consolidated EU and National Arms Export Licensing Criteria raised by FCO officials about exports of military technology and equipment to Saudi Arabia in internal FCO deliberations?

2. How many times, and on what dates, were FCO concerns under Criterion 2 raised in interdepartmental deliberations with or via the Export Control Joint Unit?

3. How many times, and on what dates, were concerns under Criterion 2 raised with Ministers in the departments responsible for arms export licensing decision making?

I can confirm that the FCDO does hold information relevant to your request.

Whilst I recognise that you have refined your request in an attempt to bring it within the appropriate cost limit specified within the (Appropriate Limit of Fees) regulations 2004. Assessments of the information held indicates that your refined request as formulated is still too widely-framed and I estimate that it will take more than 3 ½ working days to locate, retrieve and extract this information. I am therefore reluctantly refusing to comply with your request under Section 12 of the FOIA, which provides for public authorities to refuse requests for information where the cost of dealing with them would exceed the appropriate limit. You may therefore wish to refine your request further in order to bring it within scope.

You may wish to consider requesting information held in electronic format on the FCDO's centrally managed IT system for the one month period requested.

You should also be aware that multiple government departments are engaged with export licencing, for example the Ministry of Defence and the Department of International Trade. FOIA requests relate specifically to the department the request is lodged with and the information that the department hold. We would therefore only be in a position to consider releasing information held by the FCDO. You will appreciate as standard, the FCDO does not know what information is held by these other government departments.

Please note that any new request will be given a separate reference number and we will then consider whether we can provide the information requested within the appropriate cost limit. This would of course be subject to the consideration of whether any of the other exemptions under the FOI Act apply.

If you would like a review of our decision, please write to Information Rights Unit, Foreign, Commonwealth & Development Office, Room WG.75, King Charles Street, London, SW1A 2AH. Email:information.rights@fcdo.gov.uk Please note you have 40 working days to do so from the date of this letter.

You can apply directly to the Information Commissioner. However, the Information Commissioner will not normally make a decision unless you have first exhausted the complaints procedure provided by the FCDO. The Information Commissioner can be contacted at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF, or online at https://ico.org.uk/make-a-complaint/

Yours sincerely,
Information Rights Unit

For information about how the FCDO handles personal information please see our Personal Information Charter

---

From: Anna Stavrianakis <A.Stavrianakis@sussex.ac.uk>

Sent: **Friday, February 24, 2023 11:28 AM**

To: Information Rights (Sensitive) <information.rights@fcdo.gov.uk>

Subject: **Re: FOI Request - Ref: [02744]**

Dear Information Rights Unit

Thank you for your response dated 22 February 2023, ref FOI2023/02744. I am writing to refine my request to narrow its scope to bring it within the appropriate cost limit. On your advice, I would like to narrow my request to information held in electronic format on the FCDO's centrally managed IT system for the one month period requested. Thus:

Please release to me information held in electronic format on the FCDO's centrally managed IT system for the period 1 October to 31 October 2016 relevant to the following questions:

1. How many times, by officials from which teams or departments, and on what dates, were concerns under Criterion 2 of the Consolidated EU and National Arms Export Licensing Criteria raised by FCO officials about exports of military technology and equipment to Saudi Arabia in internal FCO deliberations?

2. How many times, and on what dates, were FCO concerns under Criterion 2 raised in interdepartmental deliberations with or via the Export Control Joint Unit?

3. How many times, and on what dates, were concerns under Criterion 2 raised with Ministers in the departments responsible for arms export licensing decision making?

Best wishes

Anna

Anna Stavrianakis

Professor of International Relations

University of Sussex

Falmer

Brighton BN1 9SJ

From: [REDACTED]

Sent: **Monday, February 27, 2023 16:00 PM**

To: [REDACTED]

OFFICIAL-SENSITIVE

[REDACTED]

The House of Commons' (HoC's) Foreign Affairs Committee will hold an evidence session on UK universities' engagement with autocracies tomorrow between 14:30 – 17:00 GMT. During the session, the committee will seek to ascertain to what extent HMG has responded to its concerns expressed in its 2019 report entitled "A cautious embrace: defending democracies in the age of autocracy". For this report, the committee received evidence from:

1. Dr. Anna Stavrianakis (Senior Lecturer, University of Sussex) who raised concerns about UK – Saudi Arabia relations (link)

[REDACTED]

From: Anna Stavrianakis <A.Stavrianakis@sussex.ac.uk>

Sent: **Monday, February 27, 2023 15:55 PM**

To: Information Rights (Sensitive) information.rights@fcdo.gov.uk

Subject: **Re: FOIA request 04157**

Dear Information Rights Unit

Thank you for your email. Yes, I would be happy to amend my request to read "information held in electronic format."

Best wishes

Anna

Anna Stavrianakis

Professor of International Relations

University of Sussex

Falmer

Brighton BN1 9SJ

From: Information Rights (Sensitive) <information.rights@fcdo.gov.uk>

Sent: **Monday, February 27, 2023 14:05 PM**

To: Anna Stavrianakis A.Stavrianakis@sussex.ac.uk

Subject: FOIA request 04157

Dear Anna,

In regards to our response to your previous request for information (02744). I note that you have followed narrowed the request as suggested. It has however now come to my attention that information I had been informed was held on our centrally managed IT system is in fact held else ware. In these circumstances would you find it acceptable to change the wording of your request for (04157) to:

Please release to me information held in electronic format for the one month period requested.

1. How many times, by officials from which teams or departments, and on what dates, were concerns under Criterion 2 of the Consolidated EU and National Arms Export Licensing Criteria raised by FCO officials about exports of military technology and equipment to Saudi Arabia in internal FCO deliberations?

2. How many times, and on what dates, were FCO concerns under Criterion 2 raised in interdepartmental deliberations with or via the Export Control Joint Unit?

3. How many times, and on what dates, were concerns under Criterion 2 raised with Ministers in the departments responsible for arms export licensing decision making?

Kind regards

Information Rights Unit

Follow us online: www.gov.uk/fcdo

This email is intended for the addressee(s) only: All messages sent and received by the Foreign, Commonwealth & Development Office may be monitored in line with relevant UK legislation

---

From: [REDACTED]

Sent: **Tuesday, February 28, 2023 8:39 AM**

To: [REDACTED]

Subject: **RE: NEW FOI2023/04157: Anna Stavrianakis - UK arms export licensing policy follow-up**

[REDACTED]

The requestor has reverted stating that she would be happy to change the request to:

I would like to narrow my request to information held in electronic format on for the one month period requested (1st October – 31st October 2016) relevant to the following questions:

1. How many times, by officials from which teams or departments, and on what dates, were concerns under Criterion 2 of the Consolidated EU and National Arms Export Licensing Criteria raised by FCO officials about exports of military technology and equipment to Saudi Arabia in internal FCO deliberations?

2. How many times, and on what dates, were FCO concerns under Criterion 2 raised in interdepartmental deliberations with or via the Export Control Joint Unit?

3. How many times, and on what dates, were concerns under Criterion 2 raised with Ministers in the departments responsible for arms export licensing decision making?

[REDACTED]

March 2023

Case Reference	Correspondent Name	Correspondence Date	Case Title
FOI2023/04157	Anna Stavrianakis	24/02/2023	UK arms export licensing policy follow-up

June 2023

From: Anna Stavrianakis <A.Stavrianakis@sussex.ac.uk>

Sent: **Thursday June 15, 2023 14:49 PM**

To: Information Rights (Sensitive) <information.rights@fcdo.gov.uk>

Cc: Anna Stavrianakis <A.Stavrianakis@sussex.ac.uk>

Subject: **FOI request**

Dear Information Rights Unit

I write to request information held by FCDO in relation to the Great Hall incident of 8 October 2016, also known as the Great Hall Strike, in which two guided bombs were dropped on a funeral in Sanaa, Yemen.

Please provide copies of the following:

1 - The letter from Foreign Minister Boris Johnson to Trade Secretary Liam Fox dated 8 November 2016 and referenced in this *Guardian* article, https://www.theguardian.com/politics/2017/feb/10/boris-johnson-urged-uk-to-continue-saudi-arms-sales-after-funeral-bombing

2 - The IHL update received by Boris Johnson referred to in that letter; and any additional IHL Updates or ad hoc either before or after 8 November 2016 that mention the Great Hall Incident/Strike

In light of the publication of the High Court judgement on 6 June 2023 regarding the judicial review of UK arms export licensing policy towards Saudi Arabia (case number CO/3579/2020), please provide copies of the following:

3 - Emails received by MENAD on or after 8 October 2016 from the UK's diplomatic team covering political and military activity in Yemen relating to the Great Hall Incident/Strike – as referenced in paragraph 42

4 - The ECJU-FCDO overarching assessment of Saudi Arabia's record, attitude and capability in relation to compliance with the key principles of IHL after the Great Hall Incident/Strike, and subsequent recommendation submitted to the Foreign Secretary as to the advice he should give to the International Trade Secretary – as referenced in paragraph 43

5 - FCDO-held information about UK requests to Saudi Arabia for changes to targeting after the Great Hall incident and monitoring of Saudi post-Great Hall Incident/Strike – as referenced in paragraph 110

6 - The December 2019 "Decision Paper" referenced in the 6 June 2023 High Court judgement on the judicial review of UK arms export licensing policy towards Saudi Arabia and described in paragraph 53

As this documentation has been mentioned in the court judgment I do not anticipate that this request would exceed the limit of 24 hours of work or £600 in costs to the FCDO. If this the case, please advise as to how many of these items could be produced within the time/cost limit.

Kind regards

Anna Stavrianakis

Anna Stavrianakis

Professor of International Relations

University of Sussex

Falmer

Brighton BN1 9SJ

From: Information Rights Unit <no-reply@fcdo.ecase.co.uk>

Sent: **Friday, June 16, 2023 15:22 PM**

To: Anna Stavrianakis <A.Stavrianakis@sussex.ac.uk>

Subject: **Request for information - Ref: FOI2023/12048**

Dear Anna Stavrianakis

Thank you for your FOI request under the Freedom of Information Act 2000.

We received your request on 15th June. It has been assigned a unique reference number FOI2023/12048. We aim to respond by 13th July.

Yours sincerely,

Information Rights Unit

Foreign, Commonwealth & Development Office

July 2023

From: Anna Stavrianakis <A.Stavrianakis@sussex.ac.uk>

Sent: **Thursday, July 20, 2023 11:46 AM**

To: Information Rights Unit <information.rights@fcdo.gov.uk>

Cc: Anna Stavrianakis <A.Stavrianakis@sussex.ac.uk>

Subject: **Re: Request for information - Ref: FOI2023/12048**

Dear Information Rights Unit

I submitted an FOI request on 15 June 2023. You assigned reference FOI2023/12048 to it.

I was due to receive a response 13 July (please see below). I have not received any response to date.

Please confirm when I will receive a response by. If you intend to change the response due date, I calculate that an additional 20 working days from 13 July means I should expect a substantive response by Thursday 10 August at the latest.

Best wishes

Anna

Anna Stavrianakis

Professor of International Relations

University of Sussex

Falmer

Brighton BN1 9SJ

August 2023

From: Anna Stavrianakis <A.Stavrianakis@sussex.ac.uk>

Sent: **Friday, August 18, 2023 16:13**

To: Information Rights <information.rights@fcdo.gov.uk>

Cc: Anna Stavrianakis <A.Stavrianakis@sussex.ac.uk>

Subject: **Request for internal review - Ref: FOI2023/12048**

Dear FCDO Information Rights Unit

I write to request an internal review of the handling of my FOI request, reference FOI2023/12048.

I submitted my original request on 15 June 2023.

On 16 June 2023 I received confirmation of its receipt, the reference FOI2023/12048 and the confirmation that FCDO would attempt to respond by 13 July 2023.

I received no response on or after 13 July 2023. On 20 July 2023 I wrote to ask when I might expect a response (see below). I have received no reply to this email.

I have attached my original request again for ease of reference.

I request an internal review of the handling of my request. It is now significantly more than 20 working days since I submitted my request. And the failure to notify me of a delay, and the failure to respond to my email asking for clarification, create the de facto situation of a refusal to release information, without giving me recourse to an appeal that an explicit refusal would allow. Please review how my request has been handled and allow me to have a substantive response as promptly as is possible.

Best wishes

Anna

Anna Stavrianakis

Professor of International Relations

University of Sussex

Falmer

Brighton BN1 9SJ

From: Information Rights

Sent: **Wednesday, August 23, 2023 09:36 AM**

To: Anna Stavrianakis A.Stavrianakis@sussex.ac.uk

Subject: **RE: Request for internal review - Ref: FOI2023/12048**

Dear Anna Stavrianakis,

Please accept my sincere apologies for the delay in your FOI response being issued. We are working on your response for you, and we are currently finalising our response and arranging the necessary clearances. We hope to have it with you very soon. If at that point you would like to request an internal review of our decision or you wish to make a complaint you will be able to do so.

Please accept my apologies once again and I confirm we are prioritising your request and hope to be able to issue it to you very soon.

Information Rights Unit

Foreign. Commonwealth and Development Office

From: Anna Stavrianakis <A.Stavrianakis@sussex.ac.uk>

Sent: **Friday, September 22, 2023 13:42 PM**

To: Information Rights <information.rights@fcdo.gov.uk>

Subject: **Re: Request for internal review - Ref: FOI2023/12048**

Dear Information Rights Unit

It is now more than 20 working days since you advised me you were prioritising my request and were nearly ready to issue me with a decision (see below). Please could you give a specific date by which I can expect a decision. Otherwise I will take this a failure to respond and proceed to the ICO as previously indicated.

Best wishes

Anna

I work part-time hours at Sussex. My university days are Wednesday, Thursday and Friday.

Anna Stavrianakis

Professor of International Relations

University of Sussex

Falmer

Brighton BN1 9SJ

PUBLICATIONS

Anna Stavrianakis,"DSEI: Desperately Seeking Exports Internationally," *Declassified UK*, September 12, 2023. (link)



"...Beyond the immediate support for companies to hawk their wares, it is worth remembering that the preparation for war is paid for by taxpayers.

BAE Systems, which is routinely portrayed to us as contributing to jobs and the economy, paid less than 15% of its own research and development costs in 2022: the rest is paid by the state.

The costs of weapons production are socialised – but the profits are privatised.

And the arms industry is increasingly owned by major asset managers and investment funds, whose returns flow to wealthy individuals, pension funds, and foundations..."

From: [REDACTED]

Sent: **Tuesday, September 19, 2023 1:27 PM**

To: [REDACTED]

Subject: **Reaching Critical Will E-News, September 2023**

Reaching Critical Will E-News, September 2023 View this email in your browser



E-News, September 2023

Recommended Resources

Anna Stavrianakis, "**DSEI: Desperately seeking exports internationally**,"

October 2023

From: Anna Stavrianakis <A.Stavrianakis@sussex.ac.uk>

Sent: **Tuesday, October 24, 2023 14:41 PM**

To: Information Rights information.rights@fcdo.gov.uk

Cc: Anna Stavrianakis A.Stavrianakis@sussex.ac.uk

Subject: **Re: FOI Request - Ref: FOI2023/12048**

Dear Information Rights Unit

Thank you for your email dated 23 October 2023 in which you responded to my FOI request of 15 June 2023. I am writing to request an internal review of the decision that the cost of processing your FOI request would exceed the FOI cost limit. I do so on the basis that when you last communicated with me, on 23 August 2023, you stated that "We are working on your response for you, and we are currently finalising our response and arranging the necessary clearances. We hope to have it with you very soon." The wording of this Auguust response suggests that the FCDO was processing my request and had located, retrieved and collated at least some of the information I had requested. To then state, two months later, that it would cost too much to provide a response is confusing and seems contradictory. I am concerned that the process to date is creating a situation of denial by delay, without the recourse to appeal that a prompt decision would provide.

Please could you review the treatment of my request to date and clarify:

1. Why I was told on 23 August that a response would be forthcoming soon and then on 23 October was told it would cost too much to process my request.

2. Why, if the cost was the issue, I was not told this before now. I made the FOI request in June 2023 – four months ago. I am unclear why it has taken four months for the Unit to reach the position that my request is too broad.

3. Which/how many of the six pieces of information I have requested can be accommodated in any single request. The ICO guidance states that the public authority "must give the requester reasonable advice and assistance to refine (change or narrow) their request. This will generally involve explaining why the limit would be exceeded and what information, if any, may be available within the limits."

I understand from the ICO that the target date for a response to a request for internal review is 20 working days. I calculate that 20 working days from tomorrow (25 October) is Tuesday 21 November. If I have not had a response by then I will proceed to the ICO, who have already been involved to instruct FCDO to respond to my request.

Yours sincerely

Anna

Anna Stavrianakis

Professor of International Relations

University of Sussex

Falmer

Brighton BN1 9SJ

From: **Information Rights Unit <no-reply@fcdo.ecase.co.uk>**

Sent: **23 October 2023 13:16**

To: Anna Stavrianakis <A.Stavrianakis@sussex.ac.uk>

Subject: **FOI Request - Ref: FOI2023/12048**

Dear Anna Stavrianakis,

I am writing in response to your Freedom of Information request FOI2023/12048, received 15th June. Please find our response attached.

Yours sincerely,

Information Rights Unit

Foreign, Commonwealth & Development Office

DOCUMENT

Foreign, Commonwealth & Development Office

Information Rights Unit

WG.75

King Charles Street

London

SW1A 2AH

Email: information.rights@fcdo.gov.uk

www.gov.uk/fcdo

Anna Stavrianakis

A.Stavrianakis@sussex.ac.uk

11th October 2023

Dear Anna Stavrianakis,

From: Anna Stavrianakis <A.Stavrianakis@sussex.ac.uk>

Sent: **Friday, August 18, 2023 16:13 PM**

To: Information Rights <information.rights@fcdo.gov.uk>

Cc: Anna Stavrianakis <A.Stavrianakis@sussex.ac.uk>

Subject: **Request for internal review - Ref: FOI2023/12048**

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Best wishes

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Anna Stavrianakis

Professor of International Relations

University of Sussex

Falmer

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Anna Stavrianakis

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University of Sussex

Falmer

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Information Rights Unit

Foreign, Commonwealth & Development Office

ATTACHMENT:

FCDO Great Hall FOI. docx

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In light of the publication of the High Court judgement on 6 June 2023 regarding the judicial review of UK arms export licensing policy towards Saudi Arabia (case number CO/3579/2020), please provide copies of the following:

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As this documentation has been mentioned in the court judgment I do not anticipate that this request would exceed the limit of 24 hours of work or £600 in costs to the FCDO. If this the case, please advise as to how many of these items could be produced within the time/cost limit.

Kind regards

ICO Late response letter.pdf

ico.
Information Commissioner's Office

The ICO exists to empower you through information.

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
T. 0303 123 1113

ico.org.uk

Foreign, Commonwealth and Development Office By email to:
information.rights@fcdo.gov.uk

10 October 2023

Dear Information Rights Team,

Freedom of Information Act 2000 (FOIA)
Complaint from: Anna Stavriankis
Your reference: FOI2023/12048
ICO reference: IC-261543-V3X1

The Information Commissioner has received a complaint from the above named individual who says that you have not sent a response to an information request they submitted to your organisation on 15 June 2023.

In connection with this request, please either:

- provide a substantive response to this request within 10 working days and copy that response to this office at icocasework@ico.org.uk,or
- confirm that a response to this request has already been sent and provide a copy of that response to this office, or

Please respond within 10 working days of the date of this email. If we do not receive a response from you within 10 working days of the date of this email, a decision notice finding a breach of FOIA and compelling you to respond to the request will be issued. It is your responsibility to inform us if a response has been provided.

Thank you in anticipation.

Yours sincerely,

[REDACTED]

Information Commissioner's Office
0303 123 1113 Ext. 1735

For information about what we do with personal data see our privacy notice at www.ico.org.uk/privacy-notice.
