

Reference: 02166689

Information Requests
information.requests@ofcom.org.uk

21 April 2026

Freedom of Information request: Right to know request

Thank you for your request for information concerning official engagements in California (1 July – 31 December 2025). We received this request on 20 February 2026. We wrote to you on 17 March 2026 to say we needed more time to consider the public interest in withholding or disclosing the information and we have now concluded this. We have considered your request under the Freedom of Information Act 2000 (“the FOI Act”).

Your request

I am requesting information relating to official engagements undertaken by Dame Melanie Dawes in California between 1 July 2025 and 31 December 2025.

To ensure this request remains within the cost limits under section 12 FOIA, I am seeking only the following:

1. A list of official meetings and engagements held in California during this period where Dame Melanie Dawes was present in her capacity as Chief Executive, including:

- * Date of engagement*
- * Name of organisation(s) involved*
- * The general purpose or subject of the meeting (as recorded)*

2. Any official minute, note, or summary record produced by Ofcom of those meetings.

3. Any briefing materials prepared specifically for Dame Melanie Dawes in advance of those meetings, such as documents setting out:

- * Ofcom’s key messages or agreed lines;*
- * High-level summaries of topics expected to be discussed.*

For clarity, this request relates to Ofcom’s own records of official engagements. It does not seek the disclosure of commercially sensitive material provided by third parties, nor confidential business information such as pricing strategies, technical specifications or trade secrets.

Our response

We can confirm that we met with the following organisations on 8 and 9 October 2025:

- NVIDIA
- Cohere
- Sierra AI

The purpose of these meetings was to inform our understanding of AI products and supporting infrastructure, rather than as being part of a regulatory engagement. We do not hold minutes or notes of these meetings.

A number of meetings were held as part of regulatory engagement with some of our stakeholders. Information concerning these meetings is being withheld under section 44 of the FOI Act. Section 44 exempts the disclosure of information which is prohibited from disclosure by another enactment. In this case, we are prohibited under section 393 of the Communications Act 2003 from disclosing information that relates to a business which we have obtained in exercising our functions, unless we have the consent of that business or one of the statutory gateways for disclosure under section 393(2) of the Communications Act 2003 is met. Neither of these exceptions apply here. Section 44 of the FOI Act is an absolute exemption and does not require a public interest test

We also hold further information connected to your request, but we consider that disclosure of this information is exempt under the following sections of the FOI Act:

- Sections 27(1)(a) and (c) of the FOI Act. Sections 27(1)(a) and (c) provide that information is exempt from disclosure if its disclosure would, or would be likely to, prejudice relations between the United Kingdom and any other State, or the interests of the United Kingdom abroad. Section 27 is a qualified exemption, which means that Ofcom is required to consider whether or not the public interest in disclosing the information you have requested outweighs the public interest in withholding the information. In this case, we consider that the public interest favours withholding the information for the reasons set out in an Annex A to this letter.
- Sections 36(2)(b)(ii) and (c) of the FOI Act provide that information held by a public authority is exempt from disclosure if, in the reasonable opinion of a qualified person, disclosure of the information -
 - Would, or would be likely to, inhibit the free and frank exchange of views for the purposes of deliberation, and
 - Would otherwise prejudice, or would be likely to otherwise to prejudice, the effective conduct of public affairs.
 - Section 36 is a qualified exemption, which means that Ofcom is required to consider whether or not the public interest in disclosing the information you have requested outweighs the public interest in withholding the information. In this case, we consider that the public interest favours withholding the information for the reasons set out in Annex C to this letter. In Annex B of this letter, the qualified person, the Corporation Secretary for Ofcom, has confirmed that the exemption applies.

Yours sincerely,

Information Requests

Request an internal review

If you are unhappy with the response you have received to your request for information, or think that your request was refused without a reason valid under the law, you may ask for an internal review. If you do, it will be subject to an independent review within Ofcom. We will either uphold the original decision, or reverse or modify it.

If you would like to ask us to carry out an internal review, you should get in touch within two months of the date of this letter. There is no statutory deadline for us to complete our internal review, and the time it takes will depend on the complexity of the request. But we will try to complete the review within 20 working days (or no more than 40 working days in exceptional cases) and keep you informed of our progress. Please email the Information Requests team (information.requests@ofcom.org.uk) to request an internal review.

Taking it further

If you are unhappy with the outcome of our internal review, then you have the right to [complain to the Information Commissioner's Office](#).

Annex A

Sections 27(1)(a) and (c) Prejudice to relations between the United Kingdom and any other State, or to the interests of the United Kingdom abroad.

Sections 27(1)(a) and (c) exempts information which the disclosure of would, or would be likely to, have any of the following effects:

- Prejudice relations between the UK and any other State; or
- Prejudice the interests of the United Kingdom abroad.

Key points:

- In this case, it is considered that disclosure would prejudice relations between the UK and the United States of America, and the United Kingdom's interests abroad. It is also considered that the information requested includes information which is confidential information obtained from the United States of America.
- The application of section 27 is subject to a public interest balancing test.

Factors for disclosure	Factors for withholding
<ul style="list-style-type: none"> • Ofcom recognises that its approach to its duties under the Online Safety Act 2023 is a matter of interest to the wider public. Releasing such information could be said to increase transparency in our work and allow for discussion in a public forum. 	<ul style="list-style-type: none"> • The documentation in relation to which the exemption is claimed is documentation reflecting information and briefings provided to Melanie Dawes for the purpose of meetings being conducted in the United States of America. • The disclosure of these documents could affect Ofcom's ability to appropriately and effectively brief colleagues on important information required for international travel and engagement with international organisations, and would likely have an impact on Ofcom's ability to engage with the United States of America, and companies based in the United States. • In order to fulfil its regulatory functions effectively, Ofcom needs to be able to engage with other States, and organisations based outside of the UK, which have links to the UK, for the purpose of effective regulation. • Given the above, disclosing such communications would prejudice relations between the UK and the United States of America and would also likely prejudice the interests of the United Kingdom abroad.

Reasons why public interest favours withholding information

- Ofcom is withholding the requested information. The public interest test has been applied on the basis of disclosing information which would reveal briefings provided to Melanie Dawes for the purpose of meetings being conducted in the United States of America.
- We consider that the public interest in withholding the information outweighs the public interest in disclosure.
- This is because the disclosure of this information would, or would be likely to, prejudice relations between the UK and the United States of America, and the United Kingdom's interests abroad.
- Whilst there may be some weight attached to the public interest in disclosing to enable the public to understand how Ofcom is carrying out its role as the independent online safety regulator, we consider that significant prejudice would be caused by such a disclosure.

Annex B

Freedom of Information: Right to know request

Section 36 exemption

I am a "qualified person" as referred to section 36(2) of the Act and duly authorised by a Minister of the Crown for the purposes of that section. In my reasonable opinion, disclosure of the relevant information requested

- would, or would be likely to, inhibit the free and frank exchange of views for the purposes of deliberation; and/or
- would otherwise prejudice, or would be likely otherwise to prejudice, the effective conduct of public affairs.

In applying this exemption, I have had to balance the public interest in withholding the information against the public interest in disclosing the information.

I have set out in Annex C the exemption in full, as well as the factors I considered when deciding where the public interest lay in relation to the information concerned.

If you have any queries about his letter, please contact information.requests@ofcom.org.uk.

Corporation Secretary

Date: 21 April 2026

Annex C

Section 36: Prejudice to effective conduct of public affairs

Section 36 exempts information whose disclosure would, or would be likely to, have any of the following effects:

- inhibit the free and frank provision of advice,
- inhibit the free and frank exchange of views for the purposes of deliberation, or
- otherwise prejudice the effective conduct of public affairs.

Key points:

- Section 36 can only be used if, in the reasonable view of a "qualified person", disclosure of the requested information would have one of the specified effects.

In this case, it is considered that disclosure would:

- inhibit the free and frank exchange of views for the purposes of deliberation, and
- otherwise prejudice the effective conduct of public affairs.
- The application of section 36 is subject to a public interest balancing test.

Factors for disclosure	Factors for withholding
<ul style="list-style-type: none"> • Ofcom recognises that its approach to its duties under the Online Safety Act 2023, is a matter of interest to the wider public, particularly in relation to engagement with overseas organisations. • Releasing such information could be said to increase transparency in our work and allow for discussion in a public forum. 	<ul style="list-style-type: none"> • The documentation in relation to which the exemption is claimed is briefings to Melanie Dawes for the purpose of meetings with organisations in California on 8 and 9 October 2025. • To fulfil its regulatory functions effectively, Ofcom teams need to be able to engage in free and frank discussions internally, and exchange opinions and recommendations in order for effective briefings to be provided to members of staff engaging with external organisations. • We consider that the ability for colleagues to be able to freely prepare and provide effective briefing materials contributes to our effectiveness and transparency as a regulator. • If the requested material were to be disclosed, we consider it would be likely to impact colleagues' ability to prepare effective briefing materials for engagements with external organisations, and would inhibit the free and frank exchange of views.

	<ul style="list-style-type: none">Given the above, disclosing such internal guidance would also likely prejudice the effective conduct of public affairs.
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Reasons why the public interest favours withholding information

- Ofcom is withholding the requested information. The public interest test has been applied based on disclosing information which would reveal details of briefing materials provided to Ofcom's CEO, Melanie Dawes, for the purpose of meetings with external organisations.
- We consider that the disclosure of this information is likely to prejudice the effective conduct of public affairs, as it would affect Ofcom's ability to freely and effectively discuss and deliberate on such matters.
- Whilst there may be some weight attached to the public interest in disclosure to enable the public to understand how Ofcom is carrying out its regulatory functions, we consider that prejudice would be caused by such a disclosure.