



Llywodraeth Cymru
Welsh Government

Our ref: ATISN 10480

Date: 21 June 2016

Dear

Request for Information – ATISN reference 10480

Thank you for your request which was received by the Welsh Government on 26 May (and subsequently clarified on 1 June 2016). You asked for the following information:

- How many Welsh Government civil servants hold directorship positions of private companies and charities
- Who they are
- Which companies/charities they are directors of
- When each civil servant first disclosed this information to Welsh Government

You also stated this information is already in the public domain, held by Companies House; however, it is impossible to efficiently search the database to yield this information.

Information in respect of parts 1 – 3 of your request is published on the Welsh Government internet site and is therefore exempt under Section 21 of the Freedom of Information Act (2000), information reasonably accessible to the applicant by other means. The information at the following link shows all Civil Servants who are a director/trustee for a company or charity and when their appointment started and also whether they do this in a private/personal capacity or whether they do it in an official capacity on behalf of the Welsh Government.

<http://gov.wales/about/civilservice/how-we-work/?lang=en>

With regard to part 4, I have estimated that it will cost more than the appropriate limit established in the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004 to consider your request and because of this the regulations allow me to refuse to deal with it. The appropriate limit specified for central government in £600.

When calculating whether or not your request exceeds the appropriate limit, I am allowed to consider the time it is likely to take to establish if we hold the information, locate the information, retrieve the information and extract it. If these tasks are estimated to take more than 24 hours of working time, the limit will have been exceeded.

To provide this information would require tracing each person back to the Department they were in when they first made their declaration and then locating their original documentation which could be held electronically or in hard copy either by the individual or the operations team within the area in which they sit.

I estimate that it would take approximately 15 minutes to complete the process for each of the individuals on the conflicts register. Given there are over 103 people on the list (some with multiple declarations), I estimate the limit would be exceeded ($15 \times 103 / 60 = 26$ hrs 15 minutes).

This register is updated annually or once yearly to take account of any in year changes.

If you are dissatisfied with the Welsh Government's handling of your request, you can ask for an internal review within 40 working days of the date of this response. Requests for an internal review should be addressed to the Welsh Government's Freedom of Information Officer at:

Information Rights Unit,
Welsh Government,
Cathays Park,
Cardiff,
CF10 3NQ

or

Email: FreedomOfInformationOfficer@wales.gsi.gov.uk

Please remember to quote the ATISN reference number above.

You also have the right to complain to the Information Commissioner. The Information Commissioner can be contacted at:

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

However, please note that the Commissioner will not normally investigate a complaint until it has been through our own internal review process.

Yours sincerely