



27 April 2017

Dear ,

**ATISN 11215**

Thank you for your request which I received on 29 March 2017 regarding;

- all communications between The Welsh Government and Mr Cefin Campbell and/or SPECTRWM .
- details of any payments to Mr Cefin Campbell and/or SPECTRWM and payments from Mr Cefin Campbell and/or SPECTRWYM to any representatives of The Welsh Government.
- details of any other language or education experts that have been consulted by The Welsh Government regarding the change of language in schools from English to Welsh.

Most of the information we hold that meets your request is enclosed. However, a small amount of information has been withheld under s31(1)(a) "Prevention of crime" and s43(2) "Commercial interests" exemptions provided by the Freedom of Information Act 2000 (FOIA). Full details on our application of these exemptions are set out in Annex A to this letter.

In response to your request regarding details of any experts that have been consulted regarding the change of language in schools, and following a search of our paper and electronic records, I have established that the information you require is not held by the Welsh Government, as a project of this nature hasn't been undertaken.

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,

*Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.*

*We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.*

Welsh Government,  
Cathays Park,  
Cardiff,  
CF10 3NQ

or Email: [FreedomOfInformationOfficer@wales.gsi.gov.uk](mailto: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

## Annex A

### Application of exemptions

When considering whether any exemption should be applied or not it is important to note that information released in response to a FOI request is released to the World at large not just to the requester. As such we are obliged to consider the effects of making the requested information freely available for anybody, anywhere in the World to view and use. Whilst the requester may have a genuine interest in accessing the information they have asked for, it is the use that any unknown person may put that information to that we need to take into account.

#### S31(1)(a) "Prevention or detection of crime"

The exemption is engaged where the information caught by a request, if released, would, or would be likely to, result in a criminal act, or would, or would be likely to harm the detection of any criminal act. In this case it is the prevention of crime arm of the exemption we are applying.

The information caught by the request which we are withholding under this exemption is the Bank Account number for the company SPECTRWM.

We believe that there is a very real risk that if we were to make the company's bank account number publicly available, unknown parties will use this information to access the companies account.

We can see no public interest argument in disclosing this information to the World.

On the contrary, it is not in the wider public interest for the Welsh Government to put into the public domain information that would allow unknown parties to help them selves to another parties money.

#### S43(2) "Commercial interests"

This exemption is engaged where the disclosure of the requested information would, or would be, prejudicial to a parties commercial interests. That is where disclosure would have a significant detrimental effect on a persons or businesses ability to engage in future commercial activities.

We believe that disclosure of the company's bank account details, and the subsequent likely effect of unknown persons access the company's funds would have a significant detrimental effect on the company and it's ability to engage in future activities.

As with the s31 exemption, we see no possible public interest arguments in favour of disclosing this information.

We believe it is not in the wider public interest for the Welsh Government to place into the public arena any information which would have the effect of putting any company in such a position that it would be forced to cease trading as a result of the loss of its funds.

In summary, we believe the public interest overwhelmingly supports the application of both exemptions in this case, and as such we believe the information is properly withheld from disclosure.