



10 October 2017

Dear ,

Request for Information – ATISN 11592

Thank you for your request for information which I received on 27 September 2017.
You asked:

Please could you release all correspondence – email or otherwise – to and from Natasha Hale, former Deputy Director (Sectors and Business), between April 2014 and March 2015 containing any of the following keywords: 'Bad Wolf' and/or 'conflict of interest'.

The Welsh Government has reached the conclusion 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. The appropriate limit specified for central government is £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.

Further, The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004 allows a public authority to aggregate requests for the purposes of calculating the appropriate limit where they are made

(a) by one person, or

(b) by different persons who appear to the public authority to be acting in concert or in pursuance of a campaign,

Where they are, the Regulations state that the estimated cost of complying with any of the requests is to be taken to be the total costs of complying with all of them. This applies in circumstances in which–



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(a) the two or more requests relate, to any extent, to the same or similar information, and

(b) those requests are received by the public authority within any period of sixty consecutive working days.

As well as your request above, I can confirm that on 25 September, we received the following request:

Please release all correspondence – email or otherwise – to and from Natasha Hale, former Deputy Director (Sectors and Business), between April 2016 and March 2017 containing any of the following keywords: ‘Bad Wolf’ and/or ‘conflict of interest’.

And on 26 September, we received a further request that asked:

Please could you release all correspondence – email or otherwise – to and from Natasha Hale, former Deputy Director (Sectors and Business), between April 2015 and March 2016 containing any of the following keywords: ‘Bad Wolf’ and/or ‘conflict of interest’.

The Welsh Government is of the view that the three requests relate to the same or similar information and have been submitted within sixty working days. The identical wording of the requests apart from the consecutive variations in the years asked for lead us believe they have been submitted by requestors who are acting in concert or in pursuance of a campaign.

The broad phrasing of the requests, which cite ‘all correspondence to and from Natasha Hale’ containing key words ‘Bad Wolf’ and/or ‘conflict of interest’ for the period April 2014 to March 2017 makes the search very difficult and time consuming to deal with.

An initial scoping exercise undertaken by a member of staff on his email account using the key phrase ‘Natasha Hale’ identified 666 documents. At an estimate of taking 30 seconds to investigate each e-mail to see if it contains the additional key words ‘Bad Wolf’ and/or ‘conflict of interest’ and to then extract it would take over 5 hours for this exercise alone. There are over 15 members of staff in Natasha Hale’s previous team and similar searches would need to be undertaken for each member of staff meaning the time taken to undertake this exercise would be substantially more than 24 hrs. Additional time would also be required to undertake other searches including email correspondence for other relevant staff members and different teams.

In addition, it would be necessary to search the Welsh Government’s electronic filing system. The Welsh Government’s Information and Records Management policy is available to view at <http://gov.wales/about/foi/policies/recordsmanagement/?lang=en>. Section 7 of the policy, “What are our Corporate Record Keeping Systems?” explains that our records are stored on an Electronic Document and Records Management System (EDRMS), known as iShare. iShare is the corporate repository for the majority of information created and received by Welsh Government Officials in the course of their duties that must be retained for business or historical purposes.

Documents are saved on iShare using naming conventions appropriate to the effective recording of information for our own purposes. Setting our systems in this way, and in line with our Records Management policy, enables effective delivery and will not necessarily lend themselves to being easily interrogated for generic requests for information. Where the Welsh Government believes providing such information would involve tasks that would breach the appropriate limit then, in line with our obligations under the section 45 Code of Practice, we inform the requester of that fact and invite them to narrow down or re-focus their requests.

A general iShare search using the search term 'Natasha Hale', 'Bad Wolf' and/or 'conflict of interest' yielded many thousand results. It is important to note three points:

- The search timeframe will return items on the date that the document was recorded on iShare, and not the date of the actual correspondence.
- The search would not necessarily return relevant information. This is because the naming conventions that we use do not lend themselves to being easily interrogated for information in the general and broad way that you have specified.

Assuming it would take at least 60 seconds to open and conduct a quick initial scan of each electronic document to determine whether or not it was captured by the requests, in addition to the search timeframe for searching e-mail records as described above, would significantly exceed 24 working hours. In effect, locating information with a broad description in such a large search space would be very difficult.

Because this exceeds the appropriate limit established in the Freedom of Information and Data Protection (Appropriate limit and Fees) Regulations 2004, I have decided not to process your request.

You may wish to refine your request by narrowing its scope by being more specific about what information you particularly wish to obtain. If you do refine your request in this way, this will be treated as a new request. Please be as specific and focused as possible.

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 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