

6 June 2024

Dear ,

## **ATISNs 19549, 19550 and 19598 – Requests for Information**

### **Information requested**

Thank you for your request which I received on 8 May 2024. You asked for information held by the Welsh Government regarding the Company known as Adventure Tours UK, as follows:

- The date of onboarding to the Visit Wales website
- The date of application, if made, for accreditation under the Visit Wales Adventure Activity Assurance Scheme
- The date of granting, if granted, of accreditation under this scheme
- The process and emails relating to Adventure Tours UK becoming a 2024 Visit Wales Partner
- Any data regarding any differences in provision of guided activities between Wales Outdoors, and Adventure Tours UK that would preclude Wales Outdoors a listing under Visit Wales onboarding rules but allow Adventure Tours UK to be promoted and listed with Visit Wales.

You additionally asked for the following information:

- All data held by the Welsh Government with regards to myself, Andrew John Lamb, and my business, Wales Outdoors.
- Further, please provide me with all data held by the Welsh Government with regards to the business Adventure Tours UK.

You clarified this second request on 21 May to state that you wished the data held on yourself and on Wales Outdoors to encompass only data from 1 September 2023 to the present.

I am treating these requests together as the Freedom of Information Act allows a public authority to aggregate requests where they are from the same individual on the same, or related, topics and are received within 60 working days.

I have decided that your second request contains a mixture of personal information, which will be handled as a subject access request under GDPR and under ATISN 19550. It also contains an FOI request – that is, all data held on Adventure Tours UK.

## **Our response**

From my preliminary assessment I estimate it will cost more than the appropriate limit set out in the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004 to answer your request. The appropriate limit specified for central government is £600. This represents the estimated cost of it taking over 24 hours of time to determine whether we hold the information and to thereafter locate, retrieve and extract it.

Your request for all information held by Welsh Government on Adventure Tours UK does not specify a timescale, nor does it describe the information you may be concerned with. In order to answer this part of your request, it would be necessary for us to search all files and records across the whole of Welsh Government, since the inception of Welsh Government. This would include legacy paper files as well as electronic records. We would have to consult with divisions across Welsh Government, asking each to make appropriate searches, and we would also need to request searches in email systems.

The email search alone would require us to consult with all Welsh Government officials, as emails may not be filed centrally. Although most officials would not be expected to hold any information in scope, and could quickly decide that they do not, the act of consulting with all Welsh Government officials would, in itself, take this request substantially over the appropriate limit.

I am therefore refusing all FOI parts of this request under the appropriate limit. We will respond under separate cover on the Data Subject Access Request. This will be provided by 19 June and under the reference ATISN 19550.

## **Next steps**

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: [Freedom.ofinformation@gov.wales](mailto:Freedom.ofinformation@gov.wales)

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