



Llywodraeth Cymru  
Welsh Government

Our ref ATISN 15065

18 May 2021

Dear

### **Request for Information – ATISN 15065**

I wrote to you on 27 April regarding your request for information.

#### **Information requested**

1. List of all grant awardees for the Cardiff International Film Festival from 2018 to 2021
2. Amount awarded to each of them.
3. How many times these individuals were awarded a grant (ie same person, different companies).
4. How many of these are led by Director / CEO are from BME and whether the event is prioritising BME as one of the main agendas.
5. Does any of these have a target to restrict Wales audience participation? e.g. we have the cap of 15% set by major events team.
6. List of all support grant awardees for CRF in 2020 and 2021 from 2018 to 2021
7. Amount awarded to each of them.
8. How many times these individuals were awarded a grant (ie same person, different companies).
9. How many of these are led by Director / CEO are from BME and whether the event is prioritising BME as one of the main agendas.

#### **Our Response**

I can confirm we hold some information captured by your request.

#### **Major events grant for Cardiff International Film Festival:**

For questions 1 and 3, please see information attached at Annex A.



**BUDDSODDWYR | INVESTORS**  
**MEWN POBL | IN PEOPLE**

Llywodraeth Cymru /  
Welsh Government  
Parc Cathays / Cathays Park  
CF10 3NQ

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 .

For question 2 regarding the amount awarded to each awardee, I confirm we hold information captured by your request. I have concluded, however, that this information is exempt from disclosure under Section 29, the economy, of the Freedom of Information Act 2000. Full reasoning for applying this exemption is given at Annex B.

For question 4, I can confirm that we do not hold this information.

For question 5, I can confirm that all Event Wales grant awards contain a target, suggested and agreed by the grant recipient for the number of visitors their event aims to attract into Wales from other areas. These targets typically range between 5 – 50% and are a proportion of the total visitor figure. Therefore, they do not limit the number of visitors from Wales who can also attend.

### **CRF in 2020 and 2021 Grant**

The information we hold for questions 6 and 7 is being withheld under Section 22 of the Freedom of Information Act 2000: Information Intended for Future Publication. Full reasoning for applying this exemption is appended at Annex C, at the bottom of this letter.

For question 8, only one application per organisation was permitted.

For your final question, 2.4% of businesses receiving support had a BAME owner, and similar proportions had a BAME managing director (2.2%), or BAME director (2.3%). However, these figures should be viewed with caution due to the small sample size. For this analysis the '*your position in the business*' data field was used to identify whether the applicant sender was an owner, Director, or MD. This analysis excludes those applicants who did not fall into this category (e.g. office administrator). It's therefore based on a sample and does not definitively record the exact number of BAME MDs/Directors/Owners. Also, it is important to note that this only covers the Welsh Government led elements of support.

### **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



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Welsh Government

## Annex B

The Freedom of information Act provides a right for anyone to ask a public authority to make requested information available to the wider public. As the release of requested information is to the world, not just the requester, public authorities need to consider the effects of making the information freely available to everybody. Any personal interest the requester has for accessing the information cannot override those wider considerations.

We have decided to withhold the following information:

- Question 2 - the grant amounts awarded to each awardee of major events grant funding from 2018 to 2021.

This Annex sets out the reasons for the engagement of section 29(1)(a), the economy, of the Freedom of Information Act and our subsequent consideration of the Public Interest Test, where relevant.

### **Section 29(1)(a) - The Economy**

This exemption states:

*29.—(1) Information is exempt information if its disclosure under this Act would, or would be likely to, prejudice-*  
*(a) the economic interests of the United Kingdom or of any part of the United Kingdom,*

The information caught by your second question consists of the grant amounts awarded to each awardee of major events grant funding from 2018 to 2021. Releasing the information would be likely to prejudice the economy of Wales because the Welsh Government's commercially sensitive major events grant details would be released into the public domain.

Section 29 is a qualified (public interest tested) exemption. This means that in order to engage it, the Welsh Government must show that the public interest in withholding the information is greater than the public interest in releasing it. Consideration has therefore been given to the effects of disclosure of the information to the world at large as the information is made available to anybody and everybody, not just the requestor. As such, when considering your request, the wider effects of disclosure have been considered rather than any personal interest you may have in being provided with the information.



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## **Public interest arguments in favour of release**

It is recognised that there is public interest in there being openness and transparency within Government, particularly in terms of efficiency, effectiveness and in holding spending Departments to account. It is also recognised that disclosing the information might increase understanding of how public money was used to award the Cardiff International Film Festival from 2018 to 2021.

## **Public interest arguments in favour of withholding**

The information captured by your request includes commercially sensitive, financial information regarding the amounts awarded to each awardee of major events grant funding from 2018 to 2021. We would not normally publish our 'major events' grant awards as some of these are effectively commercially sensitive as we are taking the place of a commercial partner or sponsor that might look to have an association with that 'product' either previously or in the future. Disclosing the amount of Welsh Government grant funding would therefore give other potential commercial partners a negotiating advantage over that company and weaken their commercial position. Disclosure of the information would also be likely to constrain the Welsh Government's ability to negotiate other commercial contracts if its commercial considerations were made public. This in turn would be likely to put at risk the economic interests of Wales and the public purse.

Whilst it is recognised that, as a general rule, the sensitivity of information is likely to change over time, in this case the information captured is very much current information which we accept that over time may become less commercially sensitive.

The Welsh Government is therefore of the view that the public interest is best served by withholding the information at this time order to protect the wider economic interests of Wales.



## Annex C

### **Section 22 – Information Intended for Future Publication**

Section 22 states that *Information is exempt information if –*

- a) *The information is held by the public authority with a view to its publication, by the authority or any other person, at some future date (whether determined or not)*
- b) *The information was already held with a view to such publication at the time the request for information was made, and*
- c) *It is reasonable in all the circumstances that the information should be withheld from disclosure until the date referred to in paragraph a).*

I am of the opinion that subsections (a) and (b) above are met because the Cultural Recovery Fund (CRF1) grant awardees along with the amounts awarded is held with a view to its publication. This information is expected to be published by the end of June 2021.

With regards to part (c), I have given consideration as to whether it would be ‘reasonable in all the circumstances’ that the information should be withheld from disclosure until the proposed publication date. I am of the opinion that releasing the information at this time would cause disruption to the Welsh Government’s intentions in relation to its publication arrangements. Thus I am content that the exemption is engaged.

Section 22 is a public interest exemption. This means that, in order to withhold information, I must show that the public interest in withholding is greater than the public interest in releasing it.

In terms of the public interest, it is recognised that there is public interest in there being openness and transparency within Government.

The proposed publication date for this information has been agreed as part of normal business and will be published on the Welsh Government website by June 2021.

Whilst the Welsh Government has committed to publishing information of this nature on our website, there is a thorough validation process which is undertaken on the information to ensure its accuracy. By restricting access to the grant information ahead of publication, we will be publishing the information in a co-ordinated manner to all



people at the same time, thereby ensuring an editorial process is adhered to which will confirm the accuracy of the information.

An accelerated release of the CRF1 grant information might result in inaccurate, unchecked information being disclosed prematurely, misleading the public.

To that end, I do not think it is reasonable in all the circumstances or in the public interest to release this information prematurely. Rather, I believe the public interest would be best served if the information were released as scheduled.

I am satisfied therefore that the balance of the public interest falls in favour of withholding the information.