Dear

#### **ATISN 25021**

Thank you for your request which I received on 3 August 2025. You asked for the following information:

- 1. Overseas trips conducted by the First Minister since 01 January 2024 including all countries visited on each trip.
- 2. The number of officials who accompanied the First Minister on each trip.
- 3. The total cost of flights and accommodation for each trip, including for officials.
- 4. The class of flight tickets purchased and for whom.

### Our response

The information requested for financial year 2024-25 is exempt under Section 21 of the Freedom of Information Act (2000) – information accessible to the applicant by other means. The information you requested can be found, here <a href="Ministerial code">Ministerial code</a> GOV.WALES

Information for financial year 2024-25 is exempt under Section 22 of the Act – information intended for future publication. I have set out my reasons for withholding the information at Annex 1 of this letter.

## **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 e-mail: 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

Website: www.ico.org.uk

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 1

## **Engagement of section 22(1) (Information intended for future publication)**

Whilst I can confirm that the Welsh Government holds information of this description, it is considered exempt under section 22 of the Freedom of Information Act. This states (inter alia):

- 1) 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 when 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 can confirm that the conditions under (a) and (b) are satisfied. Welsh Government does hold information since the start of the 2025/26 financial year.

For (c), the Welsh Government believes that it is reasonable in all the circumstances that the information should be withheld from disclosure until that time. Publishing the requested information now may not reflect the information that will be published on the website; it could be misleading and not present an accurate picture. For that reason, we believe it is reasonable for the publication schedule to remain so as to ensure the accuracy and integrity of the information in line with the annual reporting of full financial year information.

#### **Public Interest Test**

Section 22 is also a public interest tested exemption. This means that in order to withhold information under it, it has to be shown that the public interest in withholding the information outweighs that in releasing it. Whilst Welsh Government acknowledges the general public interest in openness and transparency that release would engender, we believe the release of information at this stage would be confusing and may not present complete overall data compared to that which will be published.

The Welsh Government believes that the current financial year information should be exempt from disclosure on the basis that more accurate and complete information will be published (and that any unverified information disclosed now may present an inaccurate picture).

# Public interest arguments in favour of disclosure

- The general presumption of openness that the FOIA aspires to; and
- General interest from certain sections of the public.

#### Public interest arguments in favour of withholding

- The intended publication date is established;
- Information released through the Freedom of Information Act is released to the world and not just the requester. The information in question is incomplete and are still undergoing quality assurance. The final, published version of the data may be substantially different, making it possible that confusion could arise when comparing the two versions and potentially leading to incorrect conclusions being drawn;
- Disclosure of this information before the publication date may compromise trust in the accuracy of official information.

# **Balance of public interest test**

On the basis of the above, we conclude that on balance the public interest arguments are in favour of withholding the data at this time.