



19 December 2025

Dear ,

Complaint in respect of ATISN 25813 – Breakdown of International Relations Budget

Thank you for your email which was received on 27 October 2025

I have now completed an internal review following your complaint about the response to your Freedom of Information (Fol) request regarding the breakdown of spend against the International Relations and the International Sustainable Development budgets for 2023-24 and 2024-25.

In your e-mail of 27 October 2025, you requested an internal review of Welsh Government's handling of your Fol request and stated that:

I asked for a detailed breakdown of the expenditure but have only received a summary statement. I would like information at the relevant nominal budget code line, such as salary, rent, specific project, grant etc

This information should be readily available from operational budget management systems.

I have decided to uphold your complaint as the information for 2023-24 and 2024-25 was not provided to the level of detail requested and you were not directed to information that was already in the public domain.

International Relations Expenditure 2023-24

A line by line breakdown of expenditure relating to the International Relations budget for 2023-24, which includes International Engagement (X817), Overseas Operations (X865) and Overseas Activity (X866) is already in the public domain at [FOI release 21937: International Engagement budget | GOV.WALES](#).

International Relations expenditure 2024-25

A line by line breakdown of expenditure relating to the International Relations budget for 2024-25, which includes International Engagement (X817), Overseas Operations (X865) and Overseas Activity (X866) is enclosed at Docs 1 and 2. However, some information has been redacted under section 40 (personal data) of the Freedom of Information Act as it contains personal information or the identification of personal information. A full analysis of my reasoning is set out in Annex A to this letter.

International Sustainable Development expenditure for 2023-24 and 2024-25

A line by line breakdown of expenditure relating to the International Sustainable Development budget for 2023-24 and 2024-25 is enclosed at Doc.3.

As above, some information has been redacted under section 40 (personal data) of the Freedom of Information Act as it contains personal information or the identification of personal information. A full analysis of my reasoning is set out in Annex A to this letter.

I have also included a table showing the nominal codes and their descriptions at Annex B.

I have considered your complaint in accordance with the procedure outlined in the Welsh Government's Practical Guide for Making Requests for Information which is available by post on request or via the internet at: [Requesting information from the Welsh Government \[HTML\] | GOV.WALES](#)

If you remain dissatisfied with this response you 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

Yours sincerely

Andrew Gwatkin
Director – International Relations & Trade
Welsh Government

Annex A

Engagement of S40(2) – Personal Data

Section 40(2) of the Freedom of Information Act 2000 (FoIA), together with the conditions in section 40(3)(a)(i) or 40(3)(b), provides an absolute exemption if disclosure of the personal data would breach any of the data protection principles.

‘Personal data’ is defined in sections 3(2) and (3) of the Data Protection Act 2018 (‘the DPA 2018’) and means any information relating to an identified or identifiable living individual. An identifiable living individual is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the individual.

Although you have not requested the names of individuals, I have concluded that some of the information caught by your request contains personal data relating to other individuals who would, or would likely, be identified or identifiable from the release of such information. Specifically, this relates to the names of individuals and identification numbers that may identify an individual staff member or personal information related to them, such as salary, allowances and pension contributions.

Under Section 40(2) of the FoIA, personal data is exempt from release if disclosure would breach one of the data protection principles set out in Article 5 of the UK GDPR. We consider the principle being most relevant in this instance as being the first. This states that personal data must be:

“processed lawfully, fairly and in a transparent manner in relation to the data subject”

The lawful basis that is most relevant in relation to a request for information under the FoIA is Article 6(1)(f) of the UK GDPR. This states:

“processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child”.

In considering the application of Article 6(1)(f) in the context of a request for information under FoIA it is necessary to consider the following three-part test:

1. The Legitimate Interest Test: Whether a legitimate interest is being pursued in the request for information.
2. The Necessity Test: Whether disclosure of the information/confirmation or denial that it is held is necessary to meet the legitimate interest in question.
3. The Balancing Test: Whether the above interests override the interests, fundamental rights and freedoms of the data subject.

Our consideration of these tests is set out below:

1. Legitimate Interest Test

The Welsh Government acknowledge the inherent legitimate interest in openness and transparency that release would engender. We do not believe the disclosure of this personal data to the wider public is necessary to meet the requester's interests, or the requester's ability to determine the overall expenditure in the disclosed tables.

2. Is Disclosure Necessary?

I do not believe disclosure is necessary in this context. Data protection legislation requires us to protect personal information being held in relation to individual members of staff, and others, and to ensure that it is only used for the purposes for which it was collected. As there are a small number of staff in each of the offices, disclosure of the total staff costs for each office under budget code X865 is likely to allow the actual salaries and any on-costs of individuals to be identified. We believe that releasing this information would be in breach of the Data Protection Act.

3. The Balancing Test

As it has been concluded that there is no necessity to disclose the personal data of another individual, the fundamental rights and freedoms of the affected third party prevail in this instance and releasing the information cannot be justified under Article 6(1)(f).

Conclusion

As the release of the information would not be legitimate under Article 6(1)(f), and as no other condition of Article 6 is deemed to apply, release of the information would not be lawful within the meaning of the first data protection principle. It has therefore been withheld under section 40 of the Freedom of Information Act. Section 40 is an absolute exemption and not subject to the public interest test.

ANNEX B

Nominal Codes

Number	Description
506040	Acc & Forex Bank Chg
508010	Advertising
501170	Agency Staff
506080	Architects/Planning
550075	Associated Costs Gap
590010	AUC Roads Capital
506030	Audit other services
504030	Building Maint
590030	Buildings Capital
506145	Bus adv ext parties
504020	Business Rates
508110	CADW Retail Goods
590140	Cap AUC Arch PI Fee
590170	CAP AUC Cash Tenants
590110	Cap AUC Fee Dis
590160	Cap AUC Man Consult
590320	Cap AUC Statuory
590150	CAP AUC Survey Fees
590395	Cap Building Refits
590395	Cap Conservation Works
550060	Cap Grants private
590260	Capital AUC Cont Wk
590120	Capital AUC Legal Fe
590300	Capital AUC Misc WIP
590190	Capital Maint Roads
507030	Car Hire
502130	Car Leases
509070	Catering
502100	Childcare Vouchers
509140	Compensation
506100	Consultancy
509060	Consumables
508070	Corp Hospitality
552010	Curr Grants to ABSBs
504270	Dilapidations Costs
508030	Direct Marketing
504080	Electricity
504040	Estate Management

508040	Exhibitions/Events
506010	External audit fees
507040	Extnl Meetings etc
504230	Factories Cleaning
504210	Factories M & E
504250	Factories Repairs
504240	Factories Services
504220	Factories Structural
506120	Feasibility Studies
504120	Fixtures & Fittings
504100	Fuel
504200	Furniture
590090	Furniture & Fittings
504070	Gas
502080	Health and Safety
504010	Highways maintenance
505050	ICT - Main Contract
505110	ICT - Maintenance
505100	ICT - Security
590070	ICT capital
590200	ICT Hardware Assets
505230	ICT Labour Costs
505030	ICT Licences & Maint
505020	ICT Low Value Purch
505240	ICT Man Consultancy
505210	ICT Service Charge
505040	ICT Software Servs
506130	Inspection Fees
590400	Int Assets Core Cap
506150	Internal Audit Fees
590560	L&I Other Loans
590280	Land Acquisition
590020	Land Additions - Capit
504190	Laundry
503010	Leased L&B
503010	Leased L&B
506070	Legal Fees
508090	Marketing - Agents
508050	Marketing Supp Mat
508020	Media Relations
509210	Medical Supplies
504140	Minor works
508100	Missions/Fairs

504150	Office Cleaning
504130	Office Equip Maint
504110	Office Equipment
590240	Office equipment
504050	Office Relocations
509030	Official Vehicles
503040	Photocopiers Rental
503030	Plant & Mach hire
590080	Plant & Machinery Ca
509050	Postage & Carriage
509040	Printing
502070	Prof Membership Fees
506140	Prog Delivery Fees
509100	Publications
590230	Purchase of Vehicles
502030	Recruitment
502060	Relocation Costs
506050	Research studies
508060	Sales Support Mat
501165	Secondees In E2EP
504180	Security Services
509080	Services from OGDs
508080	Sponsorship
502090	Staff Clothing
502050	Staff security check
509020	Stationery
506060	Statistical Services
590620	Stocks-Other Stocks
506110	Subscription Fees
504280	Sundry property cost
506090	Surveyors Fees
506160	Tech Adv Prog Fees
505070	Telecom non Merlin
505080	Telecoms Minor Purch
502010	Training & Pers Devt
509110	Translation
504260	Vacant Factories
509130	Vehicle maintenance
504170	Waste Disposal
504060	Water
504160	Window Cleaning