

Our ref: ATISN 26376 – Internal Review

Dear

Thank you for your email of 12 December 2025 requesting an internal review of the Welsh Government's handling of your Freedom of Information request ATISN 26376. I have conducted a review of the original response and considered each of the points you have raised. I set out my findings below.

### **Review of the section 12 refusal**

Having reviewed the original decision, I uphold the conclusion that responding to your request in its original form would exceed the appropriate cost limit under section 12 of the Freedom of Information Act 2000. The request covered a five-year period and sought meetings, correspondence and policy documents across Welsh Government Ministers, Special Advisers and senior communications officers in relation to BBC Wales. Given the breadth of potential engagement across multiple directorates, ministerial offices and communication channels during this period, the estimate that retrieval would exceed 24 hours' work was reasonable.

### **Your concerns regarding section 16 – duty to advise and assist**

I acknowledge your concerns that the original response did not provide sufficiently detailed advice to help you refine your request, as required under section 16 of the Act. You are correct that the ICO expects public authorities to offer practical and specific suggestions where a request is refused under section 12. Having reviewed the original response, I accept that whilst you were invited to refine your request, and despite the breadth of the original request, the response could have been more helpful in setting out more specific options for doing so.

### **Practical refinement options**

To assist you in submitting a revised request that may fall within the cost limit, we can offer the following suggestions:

**Time period:** Amending the request to narrow the timeframe significantly—for example, to a single calendar year or a six-month period - could substantially reduce search and retrieval time.

**Scope of individuals covered by the request:** Limiting the request to specific office holders (for example, the First Minister and Minister/s responsible for broadcasting policy) rather than "all Ministers, Special Advisers or senior communications officers" would focus the search more tightly.

**Type of information:** Focusing on a single category—such as formal Ministerial meetings only (excluding day-to-day correspondence), could reduce the volume of material requiring extraction.

**Subject matter:** Narrowing the subject focus to one specific policy area or theme (for example, only material relating to broadcasting policy or support for Welsh productions) rather than a broad range of topics would also assist.

You may also wish to consider a staged approach, starting with a narrower request that can be answered within the cost limit, which may then inform whether a follow-up request is necessary.

## **Conclusion**

Whilst I uphold the application of section 12 to your original request, I accept that the Welsh Government could have provided more detailed advice under section 16 at the outset. I hope the suggestions above will now enable you to submit a refined request.

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

Head of Strategic Communications  
Welsh Government