

26 March 2026

Dear

Complaint in respect of ATISN 26688

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.

Response

Your complaint asked me to consider three areas:

1. Failure to consider reasonable retrieval methods
2. Disproportionate search assumptions
3. Section 16 – Advice and Assistance

In investigating your complaint, I have examined the approach taken to establish that your request exceeded the appropriate limit. I am satisfied that both the retrieval methods considered and the search assumptions used were reasonable in responding to your request and therefore I have not upheld these aspects of your complaint.

However, I do not believe that the explanation you received in the refusal of your request was sufficient to explain the basis upon which your request was refused. I am therefore going to rectify that here.

The primary source of information for your request is the Ministerial calendar. There is no separate engagement record held. In order to search a Ministerial calendar for the information you have requested, multiple searches would be necessary as party affiliation of Members of the Senedd is not recorded in diary entries e.g. A meeting with the leader of Plaid Cymru would be recorded as Meeting with Rhyn Ap Iorwerth.

For the time period your request covers there were 12 Plaid Cymru Members of the Senedd, including the Presiding officer (or Llywydd), so at least 12 searches would need to be conducted by by name plus a number of additional searches on defined terms e.g. 'party spokespeople', 'Presiding officer' 'party leaders'. These 12 searches would need to be conducted against each ministerial diary, of which there are 14. In 2024, there was significant ministerial turnover. When a Minister leaves or their portfolio changes, their account and calendar is archived, and a new calendar is created. In 2024, all ministerial calendars were archived when the First Minister changed from Mark Drakeford MS to Vaughan Gething MS. Various calendars were also archived when ministers left Government, and all calendars were archived again when Eluned Morgan MS became First Minister.

In order to comply with your request we would need to consider:

- 14 ministerial diary archives from March 2024

- 19 ministerial diary archives for the period when Vaughan Gething was First Minister (additional archives as there were significant portfolio change during his term as First Minister)
- 15 ministerial diaries when Eluned Morgan became First Minister (additional archives where there were portfolio changes in September)

As explained in your original response, each search would take at least 3 minutes. 48 calendars and archives with at least 12 searches on them (and likely more to incorporate all titles such as 'party spokespeople') would exceed the appropriate limit.

In relation to *Section 16 – Advice and Assistance* I have upheld your complaint that you did not receive any meaningful advice on how to refine your request and should have expected to do so. This is particularly the case given it was the second time you had submitted a request for information. I am of the opinion that the additional information provided above, which explains why your request was being refused would have satisfied this requirement had it been provided initially as you would have had a better understanding of how the information was held.

Information you may wish to consider when submitting future requests of this nature.

- Information is held for individuals by name, rather than party affiliation, though their role as a spokesperson or leader could also be referenced.
- Diaries are not held as one continuous record but are archived due to Government changes and this could require a check of multiple records
- The name of the individual would only be located if they were specifically named in the diary entry. Equally a name in the diary entry is no guarantee that the meeting took place or all of those invited were in attendance.

Next steps

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

Deputy Director, Welsh Government