

24 July 2026

Dear

ATISN 27063: Request for a Review

Thank you for your email of 4 July 2026 requesting an internal review of the Welsh Government's response to your Freedom of Information request referenced above.

You asked that the internal review reconsider the decision from first principles and address 17 specific points directly (see Annex A).

Our response

The internal review has been carried out by an official who was not involved in the original decision. I have now completed my review of the handling of your request.

Whilst I acknowledge ATISN 27063 may, when viewed in isolation, appear relatively narrow, the ICO's guidance and the relevant case law make clear that a request should not always be assessed in isolation. It is necessary to consider the wider context in which the request has been made.

In this case, ATISN 27063 forms part of a sequence of interconnected requests and reviews concerning substantially related information.

In reaching my decision, I have considered the interaction between ATISN 26695, 26756, 26827 and 27063. The chronology demonstrates an ongoing series of requests, refinements and review applications between February and July 2026. In some instances, further requests were submitted before previously requested review processes had concluded. The requests also exhibit a significant degree of overlap, with later requests seeking either the same information or information closely connected to that sought previously. The ICO's guidance explains that section 14(1) exists to protect public authorities from requests that impose a disproportionate or unjustified burden. The Upper Tribunal in *Dransfield* similarly recognised that the purpose of section 14 is to protect public authorities' resources from being consumed by disproportionate use of the legislation.

Having reviewed the history of the applications for information in this matter, I consider that the cumulative burden created by this series of requests is disproportionate.

I have considered the relationship between this request and ATISN 26827 in undertaking my review, too. The original response referred to the fact that section 36 FOIA had previously been applied in relation to information sought through ATISN 26827 (the reference to section 35 was a typographical error). Although the wording differs, ATISN 27063 seeks information which overlaps with information previously sought through ATISN 26827. In my view, ATISN 27063 is properly characterised as an attempt to reframe a request for information that has already been the subject of detailed consideration under

FOIA. The request therefore forms part of the wider pattern described above and is relevant to the assessment of whether section 14(1) applies.

Having considered the request in its full context, I am satisfied that the cumulative impact of the requests has reached the point where reliance on section 14(1) is justified in relation to ATISN 27063. I am satisfied that the original decision to refuse the request under s14(1) was correct.

The original decision is therefore upheld.

As the request is being refused under s14(1) there is no requirement to consider the request further i.e. undertake searches for the information, consider partial disclosure, and so on.

Next steps

If you remain dissatisfied with the Welsh Government's handling of your request, 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