

24 August 2026

Dear

Request for Information – ATISN 27281 & 27311

Thank you for your requests for information which I received on 29 July and 6 August.

You asked for :

Copies of all correspondence from Abi Tierney, in her role with the Welsh Rugby Union, to the Welsh Government including Cabinet Secretaries, Ministers, and officials.

Include correspondence from anyone who could be reasonably interpreted as a representative of Abi Tierney at the WRU and correspondence from the WRU with relation to the WRU's restructuring strategy regarding the move to three regional sides.

The Welsh Government has reached the conclusion that it will cost more than the appropriate limit established in the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004 to consider your request. The appropriate limit specified for central government is £600. When calculating whether or not your request exceeds the appropriate limit, I am allowed to consider the time it is likely to take to establish if we hold the information, locate the information, retrieve the information and extract it. If these tasks are estimated to take more than 24 hours of working time, the limit will have been exceeded.

Further, The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004 allows a public authority to aggregate requests for the purposes of calculating the appropriate limit where they are made

(a) by one person, or

(b) by different persons who appear to the public authority to be acting in concert or in pursuance of a campaign,

Where they are, the Regulations state that the estimated cost of complying with any of the requests is to be taken to be the total costs of complying with all of them. This applies in circumstances in which—

(a) the two or more requests relate, to any extent, to the same or similar information, and

(b) those requests are received by the public authority within any period of sixty consecutive working days.

As well as your request above, I can confirm that on 6 August, we received the following request:

Please provide copies of all communications, including emails, letters, meeting invitations, meeting notes, minutes, file notes, WhatsApp or Microsoft Teams

messages (where held for official business), briefing papers and attachments, concerning proposals by the Welsh Rugby Union (WRU) to reduce the number of men's professional rugby regions or otherwise restructure the professional game in Wales.

For the avoidance of doubt, this request includes communications:

- * between Welsh Government officials and representatives of the WRU;*
- * between Welsh Government Ministers or their private offices and representatives of the WRU;*
- * between Welsh Government officials and any third party acting on behalf of the WRU, including public affairs, communications or lobbying consultants;*
- * within the Welsh Government discussing representations made by or on behalf of the WRU regarding proposals affecting the number of professional regions.*

Please include communications involving, where held:

- * Abi Tierney;*
- * Dave Reddin;*
- * any member of the WRU Executive or Board;*
- * any representative acting on behalf of the WRU in government or public affairs matters.*

The timeframe for this request is 1 January 2025 to the date this request is processed.

If it assists your searches, relevant terms may include:

- * "professional regions"*
- * "four regions"*
- * "three regions"*
- * "One Wales"*
- * "elite rugby"*
- * "professional rugby"*
- * "restructure"*
- * "consultation"*
- * "PRB"*
- * the names of the four professional clubs.*

The Welsh Government is of the view that the two requests relate to the same or similar information and have been submitted within sixty working days. The similar wording of the requests apart in similar variations in the years asked for lead us believe they have been submitted by requestors who are acting in concert or in pursuance of a campaign.

The broad phrasing of the requests, which cite 'all correspondence to and from various representatives of the WRU and Welsh Government *including emails, letters, meeting invitations, meeting notes, minutes, file notes, WhatsApp or Microsoft Teams messages (where held for official business), briefing papers and attachments,* containing key words "professional regions", "four regions", "three regions", "One Wales", "elite rugby", "professional rugby", "restructure", "consultation", "PRB"

** the names of the four professional clubs* makes the search very difficult and time consuming to deal with.

In addition, it would be necessary to search the Welsh Government's electronic filing system. The Welsh Government's Information and Records Management policy is available to view at <http://gov.wales/about/foi/policies/recordsmanagement/?lang=en>. Section 7 of the policy, "What are our Corporate Record Keeping Systems?" explains that our records are stored on an Electronic Document and Records Management System (EDRMS), known as iShare. iShare is the corporate repository for the majority of information created and received by Welsh Government Officials in the course of their duties that must be retained for business or historical purposes.

Documents are saved on iShare using naming conventions appropriate to the effective recording of information for our own purposes. Setting our systems in this way, and in line with our Records Management policy, enables effective delivery and will not necessarily lend themselves to being easily interrogated for generic requests for information. Where the Welsh Government believes providing such information would involve tasks that would breach the appropriate limit then, in line with our obligations under the section 45 Code of Practice, we inform the requester of that fact and invite them to narrow down or re-focus their requests.

A general iShare search using the search terms you have identified may yield many thousand of results. It is important to note these points:

- The search timeframe will return items on the date that the document was recorded on iShare, and not the date of the actual correspondence.
- The search would not necessarily return relevant information. This is because the naming conventions that we use do not lend themselves to being easily interrogated for information in the general and broad way that you have specified.

An initial scoping exercise undertaken by a member of staff using the key phrase 'Abi Tierney' identified 1997 documents. At an estimate of taking 1 minute to investigate each document to see if it contains the additional key words as noted above and to then extract it would take over 24 hours for this exercise alone. Similar searches would need to be undertaken for the other aspects of the requests meaning the time taken to undertake this exercise would be substantially more than 24 hrs. Additional time would also be required to undertake other searches including email correspondence for other relevant staff members, Ministers and different teams.

Assuming it would take at least 60 seconds to open and conduct a quick initial scan of each electronic document to determine whether or not it was captured by the requests, in addition to the search timeframe for searching e-mail records as described above, would significantly exceed 24 working hours. In effect, locating information with a broad description in such a large search space would be very difficult.

Because this exceeds the appropriate limit established in the Freedom of Information and Data Protection (Appropriate limit and Fees) Regulations 2004, I have decided not to process your request.

You may wish to refine your request by narrowing its scope by being more specific about what information you particularly wish to obtain. If you do refine your request in this way, this will be treated as a new request. Please be as specific and focused as possible.

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 FreedomOfInformationOfficer@wales.gsi.gov.uk. 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. However, please note that the Commissioner will not normally investigate a complaint until it has been through our own internal review process.

Yours sincerely