



28 October 2024

Dear ,

ATISN 21984 – Welsh Government Dublin Office Costs

Thank you for your request for information which I received on 30 September. In your email you have asked for information regarding the Welsh Government office in Dublin covering the period April 2023 to April 2024. I have summarised your separate requests below as:

Q.1 the total amount of funding allocated to the Welsh Government international office team based in Dublin

Q.2 a full breakdown of how the 'Welsh Government in Ireland' total budget was spent (with costs broken down to show food and drink, venue hire, and entertainment)

Q.3 the total number of individuals attending events organised by the Welsh Government team based in Ireland - clarifying which events the Welsh Government team hosted alone or in conjunction with the FCDO and other agencies based in the British Embassy

Q.4 the proportion of the total resources allocated to the Welsh Government international office team based in Dublin, covering staff salaries (including any cost-of-living allowances); relocation expenses; staff residential accommodation costs (including utilities if applicable); private healthcare; and education for children of staff.

Q.5 the Civil Service grades of the Welsh Government staff based in Ireland and specify which are local staff or on a temporary posting from Wales.

Response

The response to each question is below. I have given a combined response for questions 1 and 2.

Questions 1&2

No information held. There is no funding allocation to the team based in Dublin as there is no separate budget, therefore it is not possible to provide a breakdown to the level of detail



requested about venue hire etc. There is one budget for the whole of the overseas network of 21 offices, this is £4,684,400 which includes office rent, FCDO platform charges and staff salaries.

In addition to this there is a £750,000 activity budget that the overseas offices can bid for, to run in-country events or campaigns. Between April 2023 and April 2024, just over £60,000 was spent from the activity budget by the office in Dublin. A proportion of this was used to deliver the events and activities listed under question 3.

Question 3

Between April 2023 and April 2024, the office in Dublin hosted 14 events. Ten of the events were hosted by Welsh Government alone and four were in partnership with the Embassy or other agencies. The number of attendees across all 14 events totalled 387.

Date	Event	Attendees
May 2023	British Irish Chamber of Commerce Investor Dinner – WG only	8
May 2023	ARVR conference dinner – WG only	16
Sept 2023	Dublin Fringe panel session – partnered with Dublin Fringe	45
Oct 2023	UK-Ireland Alumni Event – partnered with British Council & Embassy	40
Oct 2023	British Irish Chamber of Commerce Annual Dinner – WG only	8
Oct 2023	Rugby World Cup Celebration – partnered with Embassy & Scottish Government in Ireland	50
Oct 2023	Ireland-Wales Forum Reception – WG only	80
Nov 2023	Investor Dinner – WG only	16
Nov 2023	Cork Chamber dinner - WG only	8
Nov 2023	Medica meet the buyer dinner – WG only	12
Feb 2024	St David's Day Reception – WG only	50
Feb 2024	International Women's Day Lunch – WG only	8
Feb 2024	St David's Day Dinner – WG only	16
Mar 2024	St Patrick's Festival Abair session – partnered with St Patrick's Festival	30

Question 4

We have determined that the information you have requested under question 4 would be classified as personal data under the Section 40 of the FOI Act 2000 and therefore exempt from disclosure.

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 is likely to allow the actual salaries of each individual to be identified. We believe that releasing this information would be in breach of the Data Protection Act.

Additional information on the application of this exemption is at Annex A.

Question 5

We have three staff based in the Dublin office. The Head of Ireland (Grade 7) and the External Relations Manager (Higher Executive Officer grade) are on temporary postings from Wales. The Senior Business Development Executive (C4 grade) is a locally engaged staff member employed by the Embassy.

Next steps

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 e-mail: Freedom.ofinformation@gov.wales

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
Telephone: 0303 123 1113
Website: www.ico.org.uk

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

Yours sincerely

Section 40(2) of the Freedom of Information Act 2000 (FOIA), and the application of Article 6(1)(f)

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 1998 (‘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. I have concluded that this relates to the salary of staff.

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 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). 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.

1. Legitimate Interest Test

The Welsh Government recognises there is a legitimate interest in expenditure from the public purse. We do not believe, however, there is any legitimate reason why the personal data would need to be released in order to make public the expenditure in this area.

The Welsh Government cannot identify any other legitimate interest in you or the public receiving the personal data captured by your request.

2. Is disclosure necessary?

The Welsh Government is of the view that it is not necessary to disclose the personal information caught by your request - we do not believe it is necessary to disclose the personal data where it could lead to identification of individual's personal data.

3. The Balancing Test

As it has been concluded it is not necessary to disclose the personal information caught by the request, there is no requirement to balance the rights and interests of those individuals against the rights, under FOIA, of the requester.

To conclude, as 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.