



Llywodraeth Cymru  
Welsh Government

ATISN 15517

December 2021

Dear

### **ATISN 15517 – Goldie Lookin Chain Video**

Thank you for your request to the Welsh Government for information under the Freedom of Information Act (2000) received on 16 September. You requested the following -

- 1: The details of the brief or briefs, including guidance from the Welsh Government to Goldie Lookin Chain (GLC) and the public relations company Golley Slater as to what key messaging information must/should be included in the creation of the music video 'Get the Jab Done' by Goldie Lookin Chain (GLC)*
- 2: The definition of 'Media Wales partnership' (includes advertorial article, digital display ads, Facebook campaign, pre-roll video ads, and programmatic display ads) which is outlined in the breakdown of the costs incurred as part of the Goldie Lookin Chain "Get the Jab done" promotional activity*
- 3: Correspondence between the Welsh Government, Goldie Lookin Chain and Golley Slater with Media Wales (Reach PLC) about this project*
- 4: Proof in the following statement that by providing the key messages to the artist/s that it is, in fact authentic 'When we work with influencers or partners, such as Goldie Lookin Chain, the Welsh Government provide the key messages that we want to communicate. The influencer or partner will then develop their content, in this case, a song, to include those messages but in their own style and voice. That way, it is authentic and speaks to their usual audience and followers.'*

### **Our response**

It's important to note that the Freedom of Information Act gives individuals a right of access to recorded information held by a public authority at the time the request was received. It does not require an authority such as the Welsh Government to provide views or opinions where those views are not already recorded. This is confirmed by the Information Commissioner's guidance 'The Guide to Freedom of Information', page 7:

*"The Act does not cover information that is in someone's head. If a member of the public asks for information, you only have to provide information you already have in recorded form. You do not have to create new information or find the answer to a question from staff who may happen to know it."*

**On Q1**, Welsh Government holds this information and can be found within the email communications enclosed at **Document 2**. To summarise, the partnership with Goldie Lookin Chain was for the group to write, record and film / produce a music video that encouraged people to get the COVID-19 vaccination and to publish the video on their official social media channels and grant permission for the Welsh Government to use it on our social media channels.

The brief for the work also required to Goldie Lookin Chain to undertake media interviews, as requested, to support the promotion of the video.

Subsequently, the brief was expanded to: allow for behind the scenes (BTS) filming of the music video for Get the Jab Done, get approval of the edited BTS films, the band to publish the BTS films to their social media channels and undertake additional media interviews as needed.

The key messages provided were:

- Vaccines are the best way out of the COVID pandemic
- Vaccination is safe and still effective with emerging variants
- Now is the time to encourage everyone to take up the invitation.
- Important to continue preventative behaviours while remainder of the eligible population in Wales is vaccinated, these are:
- it's safer to meet outside,
- get a test and self-isolate (even for mild symptoms, and even if you have been vaccinated),
- keep your distance while you are out and
- take the vaccine when you are offered.

**On Q2**, Welsh Government holds this information and is included within the email communications enclosed at **Document 2**. However, please note, this information has been exempted under Section 43 of the Freedom of Information Act 2000. A rationale for the use of this exemption is set out at **Annex 1**. To summarise, the Media Wales partnership was a paid-for advertising package to support the promotion of vaccination messages via the Get the Jab Done song and video. It included:

- a) A sponsored / advertorial article on the Wales Online website with embedded video – which can be seen at: <https://www.walesonline.co.uk/special-features/first-look-goldie-lookin-chains-21277452>

- b) Promoted social posts from the WalesOnline facebook and Twitter pages – an example post can be seen here: <https://twitter.com/WalesOnline/status/1427664015153565705>
- c) Native advertising – these are adverts that appear within relevant articles and look like sponsored content – only shown to target audience
- d) Digital Display adverts targeting relevant articles Wales online – these are similar to the native advertising but appear above or to the side of articles as banner adverts
- e) Pre-roll video adverts targeting relevant audiences – these are short videos that appear before other films

Elements c – e in the list above appeared on a range of websites operated by the owners of Media Wales – Reach PLC. These adverts were targeted to be shown to people accessing these websites within Wales and who were within our target audience for this activity.

**On Q3**, the Welsh Government's Health and Social Services Communications Team did not have direct contact with GLC. A small amount of direct communication was undertaken by the Welsh Government Social Media Team – this correspondence is attached at **Document 1**. Golley Slater undertook the majority of the communication and all negotiations with GLC on our behalf. They undertook most of their communication with GLC via telephone as it was the most effective way of reaching the band as they were preparing to tour. Email correspondence between the Welsh Government and Golley Slater in relation to this work is also attached at **Document 2**. Please note, certain information caught within the scope of this request has been exempted under Section 43 of the Freedom of Information Act 2000. A rationale for the use of this exemption is set out at **Annex 1**.

**On Q4**, Welsh Government does not hold any recorded information that would answer this. When entering into any partnership, the Welsh Government provides key messages for inclusion in the final content. We do not expect these messages to be quoted verbatim, but ask the partner to express them in their own words to bring authenticity to the content.

## **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 Email: [Freedom.ofinformation@gov.wales](mailto: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.

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

Yours sincerely,

## Annex 1

### **Engagement of Section 43(2)**

Section 43(2) Information is exempt information if its disclosure under this Act would, or would be likely to, prejudice the commercial interests of any person (including the public authority holding it).

Officials have carefully considered all of the information captured by this request and consider that the information in question should be exempt under Section 43(2) of the Freedom of Information Act.

Section 43(2) is a public interest exemption. This means that in order to withhold information under its provisions, it has to be shown that the public interest in withholding the information outweighs that in releasing it.

### **Public interest arguments in favour of release**

The Welsh Government recognises there is public interest in ensuring that taxpayers money is spent effectively. Additionally, we recognise the general presumption of openness that the FOIA aspires to.

The Welsh Government therefore, has endeavoured to ensure we are as transparent as possible, in particular through the media, publication of documents, Ministerial Written Statements and public statements in the Senedd along with ministerial press conferences and interviews. We recognise that transparency and openness improves public trust, leading to greater understanding between Governmental organisations and citizens.

### **Public interest arguments in favour of withholding**

#### **Section 43(2)**

We recognise our responsibility under the Freedom of Information Act, and the need for transparency. However, this must be balanced against the public interest in allowing businesses to protect their commercial information and not place themselves at a disadvantage in the competitive market in which it operates.

Any information on Golley Slater's prices, rates, discounts, and commercial contracts are both commercially sensitive and confidential information. Such a release of information in the public domain would be detrimental to their competitiveness and consequently disadvantage their business and potentially incur financial loss. Since Golley Slater operates in a competitive environment, in which other organisations are seeking to agree similar commercial contracts, such disclosures of prices, rates, discounts and the contents of contracts would also disadvantage their ability in future for pitching for contracts and agreeing future partnerships.

### **Conclusion**

On the basis of the above, we conclude that on balance the public interest arguments are in favour of withholding the report at this time.