

11 February 2025

Dear

**ATISN 23262– Bethel Chapel, Sketty, Swansea**

Thank you for your email which I received on 14 January 2025. You asked for:

1. Details of who owned the listed premises at the time of registration as a listed building on the 15/11/1993, and
2. What response there was to the problems that you reported during the period 2018 to 2024.

We do not hold the ownership information. However, if the chapel was in ecclesiastical use at that time, ownership is likely to have been the relevant denomination which I understand was the Union of Welsh Independents. The statutory duty to notify an owner that the building had been listed was the responsibility of the Local Authority and further details may therefore be available from Swansea Council.

The issues that you raised with Cadw were reported to Swansea Council and a copy of their response is attached at Doc 1, dated 5 February 2018. I have also attached a copy of my reply to you of 23 February 2018, at Doc 2. We have had no additional update from the Council since our email exchanges with you in April 2023 although I did ask the Council to update you direct.

I have redacted the personal information of Cadw officials and a Swansea Council officer under Regulation 13 of the Environmental Information Regulations 2004. My reasoning for doing so is set out at Annex A of this letter.

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: [freedomofinformation@gov.wales](mailto:freedomofinformation@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 A - ATISN 23262** – Regulation 13 of the Environmental Information Regulations 2004

I have decided to withhold the following information:

<b>Information being withheld</b>	<b>Section number and exception name</b>
Personal information of: <ul style="list-style-type: none"><li>• A Swansea Council officer</li><li>• Welsh Government officials</li></ul>	Regulation (13) of the Environmental Information Regulations: the information requested includes personal data of which the applicant is not the data subject.

**Engagement of Regulation 13**

Regulation 13 of the EIRs sets out an exception from the duty to disclose if the information requested is personal data protected by the General Data Protection Regulations (GDPR).

Personal data means information which relates to a living individual who can be identified from that data; or from that data and other information which is in the possession of, or is likely to come into the possession of, the data controller.

I consider that information regarding names and addresses of members of the public, as well as information relating to their private lives to be personal information.

Guidance from the Information Commissioner’s Office states:

- The starting point is to consider whether it would be fair to the data subject to disclose their personal data;
- If disclosure would not be fair, then the information is exempt from disclosure.

I have assessed that the individual concerned would have a reasonable expectation that their personal data would be kept confidential and not disclosed to the world at large. It would be unfair to the individual concerned to release their personal data. Disclosure would give rise to unfair and unwarranted intrusion on the individual’s privacy in the circumstances of this case and has the potential to cause unnecessary and unjustified harm to the individual in this case.

Release of this information may also breach article 8 of the European Convention on Human Rights – a right to respect for one’s “private and family life, home and correspondence.”

I have thus concluded that in in this case, disclosure would not have been within the reasonable expectation of the individual and the loss of privacy would cause unwarranted distress. It is my view that disclosure of would breach the first data protection principle, and thus are exempt from release under regulation 13 of the Environmental Information Regulations 2004.