

6 March 2025

Dear

ATISN 24367

Thank you for your request which I received on 11 February 2025. You asked for the following information:

- 1. Details of all meetings attended by Welsh Government ministers and/or officials within the past 10 years at which representatives from Deryn Consulting were also present. To include the date and time of the meetings, the persons who attended and the items discussed.*
- 2. Details of any contracts entered into by Welsh Government with companies, organisations and suppliers within the past 10 years whose representatives attended any meetings with Welsh Government ministers and/or officials at which representatives from Deryn Consulting were also present. To include the value of the contract, the name of the supplier and the nature of the goods/services supplied.*

Our response

In relation to part 1 of your request for meetings attended by Welsh Government Ministers, I have concluded that some of the information is exempt from disclosure under Section 21 of the Freedom of Information Act 2000 – Information accessible to applicant by other means. Further details on this exemption are set out at Annex A.

Details of Ministerial meetings and engagements are published at the following link:
[Ministerial meetings and engagements | GOV.WALES](#)

With regard to remaining Ministerial information (i.e. that which is not published) and in relation to all parts relating to Welsh Government officials, I have 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.

You have requested information over a 10-year period which may have involved many different teams, different departments across the Welsh Government and involving current and former staff, all of whose records would have to be consulted, where available. An electronic search for the information within the parameters you have given will return many records, most of which will not be relevant to your request, if at all. An initial scoping exercise was undertaken by a member of staff on our Welsh Government database,

iShare. This 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.

A simple search on iShare using the words "Deryn" identified 19000 documents and not all documents relating to your request will be called that, therefore other searches would be required.

At an estimate of taking 30 seconds to investigate each document to see if it contains any relevant information and to then extract it would take in excess of 24 hours for this exercise alone. (Additional time to undertake other *iShare* searches including email correspondence for relevant staff members will also be taken into consideration.) 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 that part of 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, including any dates or period of time relevant to the information required. 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.

In relation to part 2 of your request, there is no information held. Other than reviewing direct spend with Deryn Consulting for the last number of years through Welsh Government's finance reporting system (SAP) we would have no records of them attending meetings on other contracts. That spend would only be based on direct contracts.

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

Annex A

Section 21 - Information accessible to applicant by other means

The exemption states:

(1) Information which is reasonably accessible to the applicant otherwise than under section 1 is exempt information.

(2) For the purposes of subsection (1) —

(a) information may be reasonably accessible to the applicant even though it is accessible only on payment; and

(b) information is to be taken to be reasonably accessible to the applicant if it is information which the public authority or any other person is obliged by or under any enactment to communicate (otherwise than by making the information available for inspection) to members of the public on request, whether free of charge or on payment.

(3) For the purposes of subsection (1), information which is held by a public authority and does not fall within subsection (2)(b) is not to be regarded as reasonably accessible to the applicant merely because the information is available from the public authority itself on request, unless the information is made available in accordance with the authority's publication scheme and any payment required is specified in, or determined in accordance with, the scheme.

Public interest test

Section 21 is an absolute exemption, there is no need to consider the public interest balance.