

Date: 23 October 2026

Dear

ATISN 27569

Thank you for your request which I received on 24 September 2026. You asked for the following information:

An electronic inventory of files held in SharePoint sites and document libraries used by, or used to store working files for, Welsh Government Geographical Services, whether active or archived, including sites associated with Microsoft Teams. For each file, provide:

- *SharePoint site or source location;*
- *document library, where recorded;*
- *file name;*
- *full original or compound path;*
- *creation date; and*
- *last-modified date.*

Our response

Annex 1 provides an inventory as requested. I have concluded that some information caught by your request is exempt under Section 31(1)(a) and Section 40(2) of the Freedom of Information Act 2000. I have set out at Annex 2, the reasons for non-disclosure.

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

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 1: File Inventory

Source Location/library/path	File Name	Created	Last Modified
sites/PSG.ICT/Shared Documents	assure_dates.csv	23/03/2022	23/03/2022
sites/PSG.ICT/Shared Documents	Cof Cymru – Development Proposals.docx	14/02/2022	14/02/2022
sites/PSG.ICT/Shared Documents	email - REDACTED - s(40)(2) projected costs for current PO.pdf	17/01/2022	17/01/2022
sites/PSG.ICT/Shared Documents	Emergency Services Network (ESN) - Wiki entry.pdf	23/03/2022	23/03/2022
sites/PSG.ICT/Shared Documents	Example Prioritisation Matrix.xlsx	11/01/2022	14/01/2022
sites/PSG.ICT/Shared Documents	OS DataMapWales case study.docx	12/01/2022	12/01/2022
sites/PSG.ICT/Shared Documents	Postcode_districts_and_LA_perce-natges_based_on_rd_count.xlsx	18/03/2022	12/05/2022
sites/PSG.ICT/Shared Documents	RE SMP Portal.msg	28/10/2022	28/10/2022
sites/PSG.ICT/Shared Documents	Rights of Way data 1.xlsx	12/10/2021	20/10/2021
sites/PSG.ICT/Shared Documents	Rights of Way data.xlsx	12/10/2021	12/10/2021
sites/PSG.ICT/Shared Documents	SLR data 29092020.xls	07/09/2022	07/09/2022
sites/PSG.ICT/Shared Documents	Welsh Online Centres - 27th October 22.xlsx	28/10/2022	19/10/2026

Annex 2: Exemptions

Section 31(1)(a) – prevention or detection of crime

The Freedom of information Act/Environmental Information Regulations provide a right for anyone to ask a public authority to make requested information available to the wider public. As the release of requested information is to the world, not just the requester, public authorities need to consider the effects of making the information freely available to everybody. Any personal interest the requester has for accessing the information cannot override those wider considerations.

I have withheld elements of the full file-path information under section 31(1)(a) of the Freedom of Information Act 2000 (FOIA). Section 31(1)(a) provides an exemption where disclosure would, or would be likely to, prejudice the prevention or detection of crime.

The withheld information comprises information about the location and structure of files within Welsh Government's IT environment.

I consider that disclosure of this information would be likely to prejudice the prevention of crime. In reaching this conclusion, I have considered the prejudice test as follows:

The interest which could be harmed

The relevant interest is the prevention of crime, specifically the protection of Welsh Government's IT systems and information from unauthorised access and cyber-related criminal activity.

The nature of the prejudice

Disclosure of full file paths would reveal information about the structure and location of information within Welsh Government's IT environment. Providing this information publicly could assist a malicious actor in developing a more detailed understanding of that environment and identifying or targeting particular locations or resources.

I therefore consider that there is a causal link between disclosure of the information and an increased risk to the security of Welsh Government's systems and information.

Likelihood of the prejudice occurring

I do not consider the risk to be purely hypothetical. Information disclosed under FOIA is, in effect, available to the world at large and could be combined with other information already available about Welsh Government systems. I consider that disclosure of the detailed file-path information would be likely to increase the risk of attempts to gain unauthorised access to, or otherwise compromise, Welsh Government systems and information.

I have therefore concluded that the exemption at section 31(1)(a) is engaged.

Public interest test

Section 31(1)(a) is a qualified exemption and I have therefore considered whether the public interest in disclosure outweighs the public interest in maintaining the exemption.

Factors favouring disclosure

I recognise the general public interest in openness and transparency and, specifically, in enabling the requester to understand what information is held by Welsh Government Geographical Services and where that information is held.

Factors favouring maintaining the exemption

There is a strong public interest in maintaining the security of Welsh Government's IT systems and information and in avoiding the disclosure of technical information which could assist malicious activity. Disclosure of the detailed file-path information would provide limited additional transparency about the records themselves, while increasing the information publicly available about the structure and location of information within Welsh Government's IT environment.

I have also considered the potential for the information to be combined with other information already in the public domain. The Information Commissioner's guidance recognises that, when assessing prejudice under section 31, a public authority may take account of harm arising from information being combined with other information, sometimes referred to as the "mosaic effect".

On balance, I consider that the public interest in protecting Welsh Government systems and information from criminal activity outweighs the public interest in disclosure of the full file-path information. The information is therefore withheld under section 31(1)(a).

Section 40(2) – Personal Data

Section 40(2) of the FOIA, together with section 40(3A), provides an exemption from disclosure where the information constitutes the personal data of a third party and disclosure would contravene any of the data protection principles.

Personal data is information relating to an identified or identifiable living individual. I consider that part of the information contained within the file inventory constitutes personal data because the file name identifies an individual contractor and associates that individual with a particular purchasing transaction/purchase order.

Under section 40(2), personal data is exempt from disclosure where disclosure would contravene one of the data protection principles. The principle most relevant in this instance is Article 5(1)(a) of the UK GDPR, which requires personal data to be processed lawfully, fairly and transparently.

In considering whether disclosure would be lawful, I have considered the legitimate interests test.

1. Legitimate Interest Test

I recognise that there is a legitimate interest in transparency and accountability concerning Welsh Government's records and its use of public resources. Disclosure of the requested file inventory contributes to that interest by identifying the records held by Welsh Government Geographical Services.

However, disclosure of an individual's name within the relevant filename would identify an individual and associate that person publicly. I consider that the legitimate interest in understanding the records held can be met without disclosure of the individual's identity.

2. Is disclosure necessary?

I do not consider disclosure of the individual's name to be necessary to meet the legitimate interest identified above.

The remainder of the information concerning the file can be disclosed, with only the individual's identifying information redacted from the filename. This enables the requester to understand that the file exists and its nature, together with the other information falling within the scope of the request, without identifying the individual concerned.

I therefore consider that disclosure of the individual's name is not necessary to meet the legitimate interest in transparency and accountability.

3. The Balancing Test

As I have concluded that disclosure of the individual's identity is not necessary to meet the identified legitimate interest, it is not necessary to proceed to the balancing stage of the legitimate interests test.

I have therefore concluded that disclosure of this information would not have a lawful basis and would contravene the first data protection principle. The individual's identifying information has consequently been withheld under section 40(2) of FOIA.

The ICO confirms that where the first condition is satisfied because disclosure would contravene a data protection principle, section 40(2) is an absolute exemption and there is no separate FOIA public-interest test