



## Bute Energy (#2)

14 August 2024

### Request for Information.

Thank you for your request received on 15 July, in which you asked:

*An event was held at the Senedd on the 9th of July 2024 entitled 'Bute Energy Net Zero Skills Strategy' (originally billed as 'Bute Energy Reception').*

*Please provide a list of attendees to the event.*

*Should any of those details be considered as 'Personal Information' and not capable of being provided by FOI request, please provide only details of Members of the Senedd who attended the event.*

*Please also confirm who the Member of the Senedd was who sponsored the event and provide a copy of the invitation text.*

Please see our response below.

*List of attendees to the event.*

Events must be open to all 60 Members of the Senedd, as stated in our **Terms & Conditions**. These are shared with event organisers at the point of completing an application, and again once the event is approved.

The registered guest list is below – please note that **Members of the Senedd** and their support staff often do not respond to the RSVP but attend events despite this. As a result, we do not hold recorded information about the attendance of Members of the Senedd and their support staff.


Senedd Cymru  
Bae Caerdydd  
Caerdydd, CF99 1SN

Welsh Parliament  
Cardiff Bay  
Cardiff, CF99 1SN  
Ffôn/Tel: 0300 200 6544

E-bost/Email: [Ceisiadau-gwybodaeth@senedd.cymru](mailto:Ceisiadau-gwybodaeth@senedd.cymru)  
[Information-request@senedd.wales](mailto:Information-request@senedd.wales)

<b>Organisation</b>	<b>Number</b>	<b>Organisation</b>	<b>Number</b>
Admiral	2	Camlas	3
Antz	1	Cardiff Met	1
Ashoka	1	Cardiff and Vale College	2
Bee1	2	Cardiff School of art and Design	1
Black Mountain College	1	CBI	1
Cardiff University	2	CECA	1
Careers Wales	1	Chamber Wales	3
Coleg Y Cymoedd	1	Copper	1
Creo Skills	1	Cymru Football Foundation	1
Darogan Talent	1	Deploy Tech Ltd	1
DPJ Foundation	1	DPJ Trustee	1
Dwr Cymru	1	FAW	2
Felicitas	1	Geldards	1
Glamorgan Cricket	2	Gower College	2
Grasshopper	1	Her Place in Wales	1
IOP	1	IWA	1
Jones Brothers	1	Keep Wales Tidy	2
KEW Planning	2	Knights Brown	1
Landowner	12	Literature Wales	2
Millrace	1	Monex Group	1
Mott MacDonald	1	Romodels	1
Savills	2	Serenity Funeral Services	1
St Davids Hospice	1	Street Games	1
Sweetman & Partners	1	Sydic	4
Thirty47	2	Trivallis	2
University of South Wales	1	Urdd	1
Viridor	1	Wales Week	2
Welsh Government	1	WJEC	2
Yellow Sub Creative	1	Yellow Sub Geo	2
YFC Cantal	2	General public	3

*Copy of the invitation text*



**Strategaeth Sgiliau Gwyrdd: Llwybrau Cynhwysol i Ynni Adnewyddadwy i Gymru**

Noddwyd gan John Griffiths AS

Dydd Mawrth Gorffennaf 9fed 2024  
6.00yh – 8.00yh

Neuadd, Senedd Bae Caerdydd

Dysgwch sut rydym yn chwarae ein rhan i helpu i greu gweithlu Sero Net i Gymru

Darperir lluniaeth

**Green Skills Strategy: Inclusive Pathways into Renewables for Wales**

Sponsored by John Griffiths MS

Tuesday 9th July 2024  
6:00pm – 8:00pm

Neuadd, Senedd Cardiff Bay

Learn how we are doing our part in helping to create a Net Zero workforce for Wales

Refreshments provided

We are unable to disclose the RSVP email address which was included at the bottom of the invitation as this information constitutes personal data and disclosure would contravene one or more of the data protection principles set out in the General Data Protection Regulation as it applies in the United Kingdom (UK GDPR). As such, this information is exempt from disclosure in accordance with section 40(2) of the Freedom of Information Act 2000 (FOIA). Full details as to why this exemption has been applied are set out in the annex to this letter.

Yours sincerely

**Joanna Grenfell**  
**Information Governance & Deputy Data Protection Officer**  
**Welsh Parliament**

Your request has been considered according to the principles set out in the **Code of Practice on Public Access to Information**. If you have any questions regarding this response, please contact me. If you feel you have cause for complaint, please follow the guidance below.

Cause for concern or complaint with your FOI response.

If you are dissatisfied with the Welsh Parliament's handling of your request, you can request an internal review within 40 working days of the date of this response. Requests for an internal review should be addressed to the Freedom of Information Manager at:

**Information-request@senedd.wales** or in writing to

Welsh Parliament  
Governance and Assurance  
Cardiff Bay  
Cardiff  
CF99 1SN

If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

## Annex

The definition of personal data is set out in Article 4 of the UK GDPR, being:

“any information relating to an identified or identifiable person (‘data subject’); an identifiable natural person 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 that natural person”.

The request captures the RSVP email address contained at the bottom of the event invitation, which contains an individual’s name. This constitutes that individual’s personal data.

In addressing whether disclosure would be fair, we have considered the consequences of disclosure, the reasonable expectations of the persons concerned and the balance between their rights and any legitimate interest in disclosure. Our conclusion is that disclosure would be unfair.

Disclosures under FOIA are to the ‘world at large’ and not just the individual who made the request, as explained in **guidance** issued by the Information Commissioner’s Office. The individual captured by the request does not carry an expectation of disclosure of their personal information to the world at large. They do not undertake a public facing role, unlike (for example) elected representatives, who are accountable to the public and do not have the same expectation of privacy. In reaching this conclusion, we have consulted with the event organiser, Bute Energy, which has confirmed that this personal information should not be shared.

In our view, to disclose this personal data would create a disproportionate infringement on the individual’s interests, fundamental rights and freedoms. Disclosure would not add to the substance of our response to a degree sufficient to warrant the overriding of those fundamental rights and freedoms. We have disclosed the rest of the invitation aside from the RSVP email address, as well as the other requested information relating to the list of attendees. In our view, this goes some way to ensuring transparency and accountability, meeting the legitimate interest in disclosure.

Notwithstanding my view as to fairness, I went on to consider Article 6 of the UK GDPR. None of the legal bases in Article 6 is relevant other than Article 6(1)(f), which allows the processing of personal data if:

“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.”

This condition involves a three-part test:

- there must be a legitimate interest in disclosing the information;
- the disclosure must be necessary to meet that legitimate interest; and
- the disclosure must not override the interests, fundamental rights or freedoms of the data subjects.

We have given careful consideration to the relevant interests which include: the Commission’s obligations under the UK GDPR and the Data Protection Act 2018; your right to access this information; the individuals’ concerned and their right to privacy; and the public interest in this information being disclosed.

There is a general legitimate interest in transparency and accountability in public life. However, in our view, providing you with this personal information would not add sufficiently to the substance of our response to justify overriding the interests, fundamental rights and freedoms of those individuals.

The High Court found in Corporate Officer of the House of Commons v Information Commissioner and Brooke, Leapman and Ungood-Thomas [2008] that any interference must be proportionate. As explained above, the other information provided in response to your request is, in our view, a balanced way of meeting the legitimate interest whilst ensuring the interests, fundamental rights and freedoms of the individual is protected.