



Bute Energy (#4)

14 August 2024

Request for Information.

Thank you for your request received on 16 July, in which you asked:

I am writing to you to request information about an event that took place at the Senedd on the evening of 9 July, hosted by a Bute Energy and sponsored by the MS for Newport East (Mr Steve Griffiths). I am concerned about some of the arrangements around this event and a lack of transparency. Please respond to the following queries:

- 1. When was the event requested by Bute Energy? What rationale did the company offer for requesting the event?*
- 2. What title was given to the event at the time it was proposed? On what date was the event listed on the Senedd website? On what date were invites distributed? What was the RSVP date on those invites? On what date was the list of external guests sent to the Senedd for security clearance?*
- 3. On what basis did the member for Newport East sponsor the event? Were any other members of the Senedd involved in the sponsoring or planning of the event on 9 July?*
- 4. All members of the Senedd must be invited to such events. Which MSs responded to the invite and who attended? Did any special advisors, professional support or*

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ancillary staff attend the event? Were community groups invited to the event? What was the geographical distribution of those in attendance (did they represent a broad swathe of Wales or just a limited geography)?

5. Why was the title of the event changed on the Senedd website less than twenty four hours prior to its start time? Who requested this change and why? Was this change communicated to those who had confirmed their attendance?

6. What food and beverage package was selected for the event and were members of the Senedd who attended required to pay for their own refreshments?

7. Please provide a schedule for the event. What format did the event take? How many presentations were there? Who spoke and with what authority did they speak (i.e. what was their expertise in that domain)?

8. Were photos permitted to be taken within the event? Was special dispensation granted to the organisers to do so? Were press invited to the event? Finally, I would like you to respond to the following questions relating to the terms and conditions for external organisers of events hosted on the Senedd Estate:

1. Why did this event take place in the Senedd atrium? Your terms and conditions state that this space is reserved for events that 'showcase Welsh excellence and/or having explicit links with politics'. Why was the event not hosted at the Pierhead which is explicitly reserved as an "issues" focused building where campaigns, community initiatives and relevant artefacts are given a platform'.

2. Point 3.4 of the event terms and conditions state that invitations to such events must not include the Senedd's logo. Please share with me a copy of the invitation distributed by Bute Energy.

3. How did the event meet point 4.3.i of the Senedd event bookings terms and conditions? Was it 'clearly and broadly aligned to Members' parliamentary functions'? Or was it reflective of the 'pattern of the business week' in the Senedd?

Please see our response below.

1. When was the event requested by Bute Energy? What rationale did the company offer for requesting the event?

The event was requested on 19 October 2023. It was originally scheduled to take place in February 2024, but the organisers requested a change in date to Summer 2024.

The aims and objectives are provided below:

The Climate Emergency is the greatest challenge of our time. We must act now for future generations. In 2019, following a debate in the Senedd the Welsh Government declared a Climate Emergency. Since then, Wales has legislated to reduce greenhouse gas emissions to net zero by 2050. As a source of energy, onshore wind is the most mature of all renewable technologies, and as a result is the most cost-effective and shovel-ready choice for power generation in Wales. It is one of the most deployable and lowest-cost electricity generation technologies, and is cheaper than gas, nuclear, and coal. Whilst Wales does not have a technology specific target for onshore wind, the Welsh Government has set a target for 100% of electricity demand to be met by renewable energy by 2035. According to polling commissioned by RenewableUK in 2022, there is significant support for renewables. 74 – 88% of people in Welsh constituencies are supportive of onshore wind and 80 – 90% are supportive of having renewable energy projects in their local area – depending on constituency. Wales has been generating onshore wind at a commercial scale for over 30 years and now has around 1.3GW of onshore wind generating power to the grid. This is enough to power over 800,000 homes.

Who are Bute Energy? Cardiff-based developer Bute Energy's Community Benefits Vision is informed and underpinned by detailed social mapping work. The company uses primary and secondary research to map the need of communities closer to their proposed Energy Parks to allow them to prioritise hyper-local investment priorities for each community. A unique approach in the UK, this is a live and evolving process and is responsive to changing community needs over time. The mapping of communities helped to identify five key strategic themes for positive impact when considering renewable energy projects with communities nearby: Social Mobility: creating work opportunities, engaging with youth, and more. Education: Providing renewable energy education to local institutions. Recreation and Health: Enhancing access to recreational and health activities. Environment and Culture: Promoting local Welsh culture, heritage, and environmental projects. Cost of Living: Collaborating to address the cost-of-living crisis, with a focus on energy efficiency. The five themes now form the basis for the Bute Energy Social Value Strategy, and alongside ongoing research and community engagement, will help target Bute Energy's Community Investment - which will total up to £800m through the lifetime of their project portfolio.

Aims of a Senedd reception: In Wales we want to be pioneering in doing business differently and this event will celebrate how renewable energy investment will bring benefits to communities across Wales. The

evening will celebrate the partnerships that we have developed in communities and promote our Social Value Strategy.

- 2. What title was given to the event at the time it was proposed? On what date was the event listed on the Senedd website? On what date were invites distributed? What was the RSVP date on those invites? On what date was the list of external guests sent to the Senedd for security clearance?*

The title that was given at the time it was proposed was Bute Energy Reception. The event was listed on to the website one month prior to the event date. Invitations were approved by the Senedd team on 23 May 2024 and by the office of the sponsoring Member of the Senedd, John Griffiths MS. Bute Energy were informed of the approval on the same day. As invitations are issued directly by the organiser (in this case Bute Energy), the Senedd Commission does not hold a record of the exact date these were issued. Therefore, this information is not held. The RSVP date on the invitations was 26 June 2024. The list of external guests was shared with some internal staff/stakeholder for information.

- 3. On what basis did the member for Newport East sponsor the event? Were any other members of the Senedd involved in the sponsoring or planning of the event on 9 July?*

It is up to the Member to decide on what basis they sponsor any event, according to the Senedd's terms and conditions. Here is a link to the relevant part of our website: [Terms and Conditions \(senedd.wales\)](#). No other Members were involved in the sponsoring or planning.

- 4. All members of the Senedd must be invited to such events. Which MSs responded to the invite and who attended? Did any special advisors, professional support or ancillary staff attend the event? Were community groups invited to the event? What was the geographical distribution of those in attendance (did they represent a broad swathe of Wales or just a limited geography)?*

Two Senedd Members registered to attend via the official RSVP procedure, these are Janet Finch-Saunders MS, and Llyr Griffiths MS. We are not able to confirm whether they attended as we do not hold this information. Members of the Senedd sometimes attend events without responding to the RSVP. No special advisors, professional support or ancillary staff registered to attend via the RSVP process. We are unable to confirm whether any of these individuals attended as we do not hold this information.

The guestlist was managed by Bute Energy as the organiser. For this reason, we do not hold information on whether community groups were invited to the event, nor are we able to comment on the geographical distribution of those invited to the event.

5. *Why was the title of the event changed on the Senedd website less than twenty four hours prior to its start time? Who requested this change and why? Was this change communicated to those who had confirmed their attendance?*

On 8 July 2024, the Senedd booking team was contacted, questioning the accuracy of the details published on the public calendar. Following discussions with the sponsoring Member's office and Bute Energy, the event title was changed to "Bute Energy Net Zero Skills event". Bute Energy were responsible for issuing the invitation, therefore we do not know whether a revised invitation was issued.

6. *What food and beverage package was selected for the event and were members of the Senedd who attended required to pay for their own refreshments?*

We hold no recorded information in relation to this request.

7. *Please provide a schedule for the event. What format did the event take? How many presentations were there? Who spoke and with what authority did they speak (i.e. what was their expertise in that domain)?*

Please see a schedule for the event below.

1800 – 1845

Arrival, networking, refreshments

1845 – 18.50

Welcome, Introductions to John Griffiths MS

1850 - 1900

Setting the scene – John Griffiths MS

19.00-19.10

Introduction to Bute Energy the What and Why

1910 - 1920

Bute Energy Community Investment with intro to video

1920 - 1925

Bute Energy Video

1925 – 1930

Key messaging from the strategy and close

1930 – 2000

Networking and refreshments

The format of the event is as stated in the schedule above.

There were no presentations. There was a holding slide, with an image, and a video.

The content of the event, including those asked to speak, is managed by the organiser, Bute Energy. The sponsoring Member is responsible for the content and subject matter of the event. According to the schedule submitted by the organiser, the sponsoring Member, John Griffiths MS, spoke at the event.

We are unable to disclose the identities of the other speakers 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.

8. Were photos permitted to be taken within the event? Was special dispensation granted to the organisers to do so? Were press invited to the event?

Photos are permitted at all Member sponsored Senedd events unless explicitly requested by the organiser otherwise. To our knowledge, no request of this nature was made.

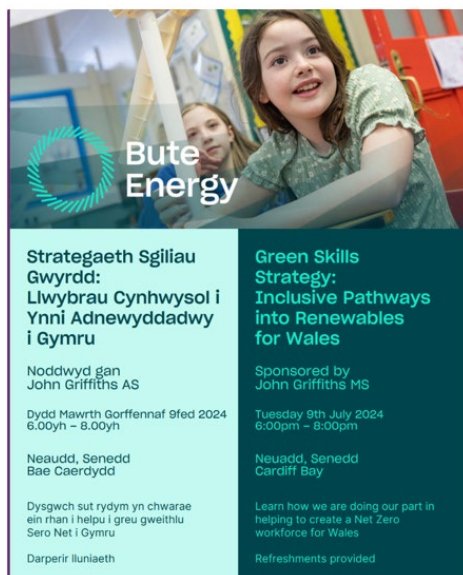
The Senedd is not responsible for the guestlist for Member Sponsored events and is unable to confirm whether members of the press were invited.

Finally, I would like you to respond to the following questions relating to the terms and conditions for external organisers of events hosted on the Senedd Estate

1. *Why did this event take place in the Senedd atrium? Your terms and conditions state that this space is reserved for events that 'showcase Welsh excellence and/or having explicit links with politics'. Why was the event not hosted at the Pierhead which is explicitly reserved as an "issues" focused building where campaigns, community initiatives and relevant artefacts are given a platform'.*

This is a guide and not an explicit rule. The Pierhead is not usually open during the evening. Opening the Pierhead for an event incurs additional cost in terms of security cover. Where the Senedd is already open to the public it often makes sense to use the Senedd as a venue for events of this nature. Hosting events in the Senedd on evenings when the Senedd has met in plenary also facilitates Member attendance. The date of the event, 9 July 2024, was a plenary day.

2. *Point 3.4 of the event terms and conditions state that invitations to such events must not include the Senedd's logo. Please share with me a copy of the invitation distributed by Bute Energy.*



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.

3. *How did the event meet point 4.3.i of the Senedd event bookings terms and conditions? Was it 'clearly and broadly aligned to Members' parliamentary functions'? Or was it reflective of the 'pattern of the business week' in the Senedd?*

The event aligned with Members' parliamentary functions.

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 names of individual speakers who spoke at the event in question, as well as the RSVP email address included at the bottom of the event invitation which contains an individual’s name. This constitutes those individuals’ 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. Many of the individuals captured by the request do not carry an expectation of disclosure of their personal information to the world at large. In reaching this conclusion, we have consulted with the event organiser, Bute Energy, which has confirmed that this information should not be shared.

Where it is reasonable to conclude that an individual would carry an expectation of disclosure, such as elected representatives, we have disclosed their personal information. Elected representatives undertake a public facing role and are accountable to the public, meaning that an expectation of privacy is diminished for those individuals. This is not the case for other individuals whose personal data is captured.

In our view, to disclose their personal data would create a disproportionate infringement on their individual 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. As well as the personal information of elected representatives, we have also disclosed the schedule of the event as requested, which

includes the topics and content of individual items to that schedule, and the rest of the event invitation aside from the RSVP email address. In our view, this goes some way to ensuring transparency and accountability, and meeting the legitimate interest in disclosure. In line with the request, we have released other information relating to the administration and organisation of the event, to the extent that we hold that information, which goes some way to enabling public accountability and debate.

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 the personal information of other speakers (aside from an elected representative) 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 individuals is protected.