

5 February 2026

Dear

## **Request for information - ATISN 26556: St David's Day Pilot Support Fund**

### **Your Request**

Thank you for your request which I received on 8 January 2026. You asked for:

1. Number of applications made to the St. David's Day 2026 Pilot Support Fund.
2. Number of successful applications for grants to the St. David's Day 2026 Pilot Support Fund.
3. List of projects and the corresponding locations of successful grant applications to the St. David's Day 2026 Pilot Support Fund.
4. List of projects and locations of unsuccessful applications to the St. David's Day 2026 Pilot Support Fund.
5. Total amount approved for successful projects and distribution by postcode.
6. You state in your email (sent to unsuccessful applicants) 'We received a large number of applications with a value that was far above our budget and difficult decisions had to be made'. Please provide details of how these 'difficult decisions were made' and provide all related decision-making documentation.
7. Please provide details of the St. David's Day 2026 Pilot Support Fund shortlisting process and how decisions were made in line with the funding criteria. Please provide the shortlisting process documentation, documentation of any points, process or documentation of any other process used in the selection and/or non-selection of projects?
8. You state in your email 'this may be disappointing however we appreciate the effort you put into applying and hope you will still find ways to celebrate St David's Day 2026 within your community or organisation' please provide details on how those unsuccessful will do this. Please provide documentation to this statement whether it be in any minutes, notes or statements made on how local communities will find ways to celebrate without being successful in the St. David's Day 2026 Pilot Support Fund.

### **Our response**

I can confirm that the Welsh Government holds some of the information you have requested. A copy of the information I have decided to release is enclosed.

I have decided, however, that some of the information is exempt from disclosure under section(s) 22 – information intended for future publication, section 40 – personal data, and section 43(2) commercial interests, of the Freedom of Information Act and is therefore withheld. The reasons for applying these exemptions are set out in full at Annex A to this letter.

For question one, the number of applications made to the St. David's Day 2026 Pilot Support Fund was 450.

For questions two, three and five, this information is withheld under Section 22, information intended for future publication. Please see Annex A for full reasoning.

For question four, this information is withheld under Section 43. Please see Annex A for full reasoning.

For question six and seven, I can confirm that the applications were assessed in line with the appraisal criteria set out in the Guidance Notes (see pages 11-12) - [St David's Day 2026: Pilot Support Fund - Applicant Guidance notes](#). Please also find attached the minutes of the St Davids Day 2026 Pilot Support Fund Appraisal Panel meeting at Annex B. Please note that all personal information has been withheld under Section 40, personal data. Please see Annex A for full reasoning.

For your final question, I can confirm that we do not hold this information.

### **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 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**

### **Application of exemptions**

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 decided to withhold the following information under Section 22 - Information intended for future publication:

2. Number of successful applications for grants to the St. David's Day 2026 Pilot Support Fund.
3. List of projects and the corresponding locations of successful grant applications to the St. David's Day 2026 Pilot Support Fund.
5. Total amount approved for successful projects and distribution by postcode.

The following information is also being withheld under Section 40 – personal information:

7. All personal information contained within the St Davids Day 2026 Pilot Support Fund Appraisal Panel Minutes document.

and the following information under Section 43(2) – Commercial interest:

4. List of projects and locations of unsuccessful applications to the St. David's Day 2026 Pilot Support Fund.

This Annex sets out the reasons for the engagement of section(s) 22, 40 and 43(2) of the Freedom of Information Act and our subsequent consideration of the Public Interest Test.

### **Public Interest Test**

In order to satisfy the public interest test in relation to the exemption(s), it is necessary to conclude that the public interest arguments in favour of withholding the information are sufficient to outweigh the public interest arguments in favour of release.

### **Engagement of Section 22 - Information intended for future publication**

The Welsh Government believes that information on successful applicants to the St Davids Day 2026 Pilot Support Fund should be exempt from disclosure at this time.

## **Public interest arguments in favour of disclosure**

In terms of the public interest, it is recognised that there is public interest in there being openness and transparency within Government, as well as timely understanding of government decision-making.

## **Public interest arguments in favour of withholding**

The Welsh Government has committed to publishing information of this nature on our website however there is a thorough due diligence and decision making process which is undertaken on the information to ensure its accuracy.

Ongoing due diligence checks may identify issues that affect eligibility or lead to changes. An accelerated release of a provisional list could undermine the integrity of the vetting process and potentially mislead the public. Until legal agreements are signed, prospective grant offers remain conditional.

We must ensure fairness and equal treatment of all applicants. Releasing names before agreements are finalised may unfairly disadvantage or place pressure upon applicants who have not yet completed checks

It is very important that the Welsh Government maintains the integrity of the official publication process. By restricting access to the information ahead of publication, we will be publishing the information in a co-ordinated manner to all people at the same time, and will ensure the due diligence process is adhered to.

Applicants who possibly do not receive a grant following due diligence could be exposed to reputational or commercial risk if premature disclosure occurs, particularly if their capacity or governance later proves problematic.

We intend to publish the full, verified list of grant award recipients once due diligence checks are completed and grant offer letters/legal agreements are in place. Until that point, outcomes may change, and names cannot be confirmed as final.

## **Balance of public interest test**

On balance, I believe the public interest favours maintaining the Section 22 exemption at this time. The information is intended for publication following the completion of mandatory due diligence checks and the signing of legal grant documentation. Premature disclosure would risk releasing inaccurate information, undermining due process, and compromising fairness to applicants. These risks outweigh the limited public interest in early disclosure. The list will be published once all awards are finalised and can be released in an accurate and officially verified form.

I am satisfied therefore that the balance of the public interest falls in favour of withholding the information.

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## **Engagement of Section 40(2) – personal data**

The Welsh Government believes the personal data contained in the information being released with this request should be exempt from disclosure

Section 40(2) of the Freedom of Information Act 2000 (FOIA), together with the conditions in section 40(3)(a)(i) or 40(3)(b), provides an absolute exemption if disclosure of the personal data would breach any of the data protection principles.

‘Personal data’ is defined in sections 3(2) and (3) of the Data Protection Act 2018 (‘the DPA 2018’) and means any information relating to an identified or identifiable living individual. An identifiable living individual 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 the individual.

We have concluded that, in this instance, some of the information contained within one of the documents caught by your request contains third party personal data. Specifically, this relates to the minutes of the St Davids Day 2026 Pilot Support Fund Appraisal Panel meeting, containing names of Welsh Government officials.

Under Section 40(2) of the FOIA, personal data is exempt from release if disclosure would breach one of the data protection principles set out in Article 5 of the UK GDPR. We consider the principle being most relevant in this instance as being the first. This states that personal data must be:

*“processed lawfully, fairly and in a transparent manner in relation to the data subject”*

The lawful basis that is most relevant in relation to a request for information under the FOIA is Article 6(1)(f) of the UK GDPR. This states:

*“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”.*

In considering the application of Article 6(1)(f) in the context of a request for information under FOIA it is necessary to consider the following three-part test:

1. The Legitimate interest test: Whether a legitimate interest is being pursued in the request for information;
2. The Necessity test: Whether disclosure of the information/confirmation or denial that it is held is necessary to meet the legitimate interest in question;
3. The Balancing test: Whether the above interests override the interests, fundamental rights and freedoms of the data subject.

Our consideration of these tests is set out below:

## **1. Legitimate Interest Test**

The Welsh Government recognises there is a legitimate interest in being able to identify the officials involved in any communication in order to follow the flow of that communication and to understand the views and positions expressed by each person. We do not believe, however, there is any legitimate reason why the personal data would need to be released in order to follow and understand those communications. The views expressed in the minutes are those of the Welsh Government. As such it is irrelevant as to who made those comments. The Welsh Government cannot identify any other legitimate interest in you or the public receiving the personal data captured by your request.

## **2. Is disclosure necessary?**

The Welsh Government is of the view that it is not necessary to disclose the personal information caught by your request. It is straight forward, even when withholding the personal data, to follow the minutes of the meeting and to identify the views expressed by each Welsh Government official. As such we do not believe it is necessary to disclose the personal data to allow the conversations to be followed.

## **3. The Balancing Test**

As it has been concluded that there is no necessity to disclose the personal data of another individual, the fundamental rights and freedoms of the affected third party prevail in this instance and releasing the information cannot be justified under Article 6(1)(f).

## **Conclusion**

To conclude, as release of the information would not be legitimate under Article 6(1)(f), and as no other condition of Article 6 is deemed to apply, release of the information would not be lawful within the meaning of the first data protection principle. It has therefore been withheld under section 40 of the Freedom of Information Act. Section 40 is an absolute exemption and not subject to the public interest test.

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## **Engagement of Section 43(2) – Commercial interests**

The Welsh Government believes that that releasing the names of unsuccessful applicants would be likely to prejudice the commercial interests of the organisations that applied to the scheme

## **Public interest arguments in favour of disclosure**

In terms of the public interest, it is recognised that there is public interest in there being openness and transparency within Government. Knowing which projects were unsuccessful can help the public understand priorities, funding criteria, and whether the scheme is delivering value.

## **Public interest arguments in favour of withholding**

Releasing the names of unsuccessful applicants could discourage organisations from applying to potential future rounds if they believe their involvement could later become public or if they fear reputational harm. The grant scheme depends on a strong applicant pool; harming participation could damage the scheme's effectiveness and therefore indirectly harm the public.

Public identification of unsuccessful applicants could impact businesses or organisations' commercial standing, particularly if rejection from a high-profile scheme could be interpreted negatively. Additionally, many unsuccessful projects may involve early-stage innovation where public disclosure could reveal concepts still under development, harming applicants' competitive advantage. Some applicants operate in competitive sectors where information about their unsuccessful bids could be used by competitors to infer business strategy or vulnerabilities.

## **Balance of public interest test**

On balance, I believe the public interest favours maintaining the Section 43(2) exemption. We recognise the significant public interest in transparency around the administration of public funds. However, there is also a strong public interest in ensuring that businesses and organisations can apply for funding without risk of commercial harm or commercially sensitive or developmental information is not exposed to competitors. The Welsh Government would like future schemes to remain attractive to applicants, supporting a healthy level of innovation and participation.

In conclusion, I am satisfied therefore that the balance of the public interest falls in favour of withholding the information.