

30 September 2026

Dear

ATISN 27393 Single Advice Fund

Information requested

Thank you for your request which I received on 24 August 2026. You asked for:

- A copy of Riverside Advice Ltd Single Advice Fund 2025-2028 funding application form or the answers submitted as part of the application.
- The scoring breakdown for all applications made for the Single Advice Fund in the same region and opportunity as Riverside Advice Ltd.
- Riverside Advice Ltd's current reported figures of cases and level of advice reported to Welsh Government as the funder.

Our response

Further to our response dated 21 September, which provided information held on points 2 and 3 above, a copy of the information I have decided to release in relation to point 1 is enclosed.

I have decided that **some of the information relating to 'A copy of Riverside Advice Ltd Single Advice Fund 2025-2028 funding application form or the answers submitted as part of the application'** is exempt from disclosure under sections 43(2) and 40(2) of the **Freedom of Information Act** and is therefore withheld. The reasons for applying these exemptions are set out in full at Annex 1 to this letter.

I acknowledge that the response dated 21 September did not explicitly address whether the Welsh Government holds the information as requested in relation to point 3 above. Having reviewed this aspect of the request, I can confirm that, under section 1(1)(a) of the Freedom of Information Act 2000, the Welsh Government does not hold recorded information that would enable it to identify:

- Riverside Advice Ltd's current reported figures of cases and level of advice reported to Welsh Government as the funder.

All recorded information falling within the scope of the request was disclosed in the original response.

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: 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.

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

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 some of the following information as requested under point one of your request:

- A copy of Riverside Advice Ltd Single Advice Fund 2025-2028 funding application form or the answers submitted as part of the application

Some information has been redacted from the disclosed version of Riverside Advice Ltd Single Advice Fund 2025-2028 funding application form or the answers submitted as part of the application under section 43(2) and 40(2) of the Freedom of Information Act 2000.

Section 43(2) exempts information where disclosure would, or would be likely to, prejudice the commercial interests of any person, organisation or public authority.

Section 40(2) any information to which a request for information relates is also exempt information if it constitutes personal data which does not fall within subsection

Engagement of the Exemption

We recognise the public interest in openness, transparency and accountability in relation to the awarding of public funds.

I am satisfied that disclosure of this information would be likely to prejudice Riverside Advice Ltd's commercial interests. The information reflects the organisation's proprietary approach to service design, delivery and financial management. Its disclosure could enable other organisations to adopt or adapt elements of that approach when preparing future funding applications, tenders or proposals, thereby weakening Riverside Advice Ltd's competitive position.

Riverside Advice Ltd operates within a competitive funding and procurement environment. Releasing detailed information about its operational and strategic

methods would be likely to adversely affect its ability to secure future funding opportunities and income. I therefore consider that section 43(2) is engaged.

1. Public Interest in Favour of Disclosure

As section 43(2) is a qualified exemption, I have considered the public interest in disclosure against the public interest in maintaining the exemption.

There is a clear public interest in openness and accountability regarding the use of public funds and the basis on which funding decisions are made. Disclosure may assist public understanding of the assessment process and funding decisions.

2. Public Interest in Maintaining the Exemption

However, there is also a strong public interest in protecting the legitimate commercial interests of organisations participating in competitive funding processes. Disclosure of detailed commercially sensitive information would be likely to place applicants at a disadvantage in future funding and procurement exercises. There is also a public interest in ensuring that organisations can provide public bodies with full and candid information, including commercially sensitive material, without undue concern that it will subsequently be disclosed.

3. Balance of the Public Interest Test

The application has been disclosed in redacted form, enabling public scrutiny while protecting information whose disclosure would be likely to prejudice Riverside Advice Ltd's commercial interests. This achieves an appropriate balance between transparency and the protection of commercially sensitive information.

Having considered the competing public interests, I conclude that on balance the public interest in maintaining the exemption outweighs the public interest in disclosure. Transparency is sufficiently served through the release of the application subject to redactions, while disclosure of the withheld information would be likely to prejudice Riverside Advice Ltd's commercial interests.

Accordingly, the information has been withheld under section 43(2) of the Freedom of Information Act 2000

Freedom of Information Act 2000: Section 40(2)

Section 40(2) 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 1998 (‘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, the information requested contains third party personal data. 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 GDPR. We consider the principle being most relevant in this instance as being the first. This states that personal data must be:

1. Legitimate interests

The Welsh Government has not identified a legitimate interest in disclosure of the signature.

2. Is disclosure necessary?

We do not consider disclosure of the signature to be necessary to meet the legitimate interests identified above. Disclosure of the signature itself would add little, if any, additional value to public understanding of the application or the funding decision.

3. The balance between legitimate interests and the data subject's interests or fundamental rights and freedoms

We consider that the individual's interests and rights outweigh any legitimate interest in disclosure of the signature.

The signature is personal data that the individual would not reasonably expect to be disclosed into the public domain in response to a Freedom of Information request. The purpose of providing the signature was to authenticate and authorise the application as part of the grant process, rather than for wider public disclosure. Disclosure could increase the risk of the signature being copied, reproduced, or otherwise misused for unauthorised purposes.

As release of the information would not be lawful, fair or transparent, 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.