September 2026

Dear

ATISN 27463 – Discretionary Assistance Fund – Data Matching
ATISN 27471 – Discretionary Assistance Fund – Exclusion criteria: origin, evidence, authorisation and financial impact
ATISN 27472 – Discretionary Assistance Fund – Follow-up information request – monetary value of DAF refusals and 2024/25 underspend

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

ATISN 27463

1. DPIA screening and decision
Please provide every DPIA screening assessment, threshold assessment, checklist, decision record, risk assessment or other recorded consideration of whether DAF data matching, fraud detection, risk flagging or associated decision-support processing required a DPIA. Please also provide:

- the recorded reasons for concluding that a DPIA was not required;
- when that conclusion was reached;
- who made and/or approved it;
- the criteria against which the need for a DPIA was assessed; and
- whether that conclusion has subsequently been reviewed.

2. Basis of Welsh Government's position
Please identify any recorded basis for the statement in ATISN 27304 that a DPIA was not required **because there is no automated decision-making**. In particular, please provide any recorded consideration of whether a DPIA might nevertheless be required because of the **nature, scope, context or purposes of the underlying personal-data processing**, irrespective of whether the final approval/refusal decision is made by a human. If no such recorded assessment exists, please state this expressly.

3. Data being matched
Please identify:
- the categories of applicant personal data used in data matching;
- the databases, systems, datasets or other sources against which applicant information is matched or compared;
- whether any special-category or otherwise sensitive personal data are involved;
- whether information is obtained from sources other than the applicant; and
- whether information originally collected for another purpose is subsequently used in DAF matching or risk assessment.

4. Organisations involved

Please identify every organisation involved in supplying, receiving, accessing, matching, analysing or otherwise processing applicant information within these processes, including the respective roles of:

- Welsh Government;
- NEC Software Solutions;
- Family Fund Business Services; and
- any other public or private organisation involved.

Please identify, where recorded, the controller, joint-controller or processor role attributed to each organisation.

5. Risk flags and outputs

Please identify the types of:

- fraud flags;
- risk indicators;
- classifications;
- matches;
- scores;
- alerts; or
- other outputs

generated by these processes.

6. Effect on an application

Please provide recorded information showing whether a match, flag, classification or other output can:

- prevent or restrict an application from progressing;
- result in additional verification;
- cause an application to be referred elsewhere;
- alter the information presented to a decision-maker;
- affect the degree of scrutiny applied;
- influence the route or speed with which an application is processed; or
- otherwise affect the treatment of an applicant.

Please also explain, by reference to recorded policies or procedures, **what a human decision-maker is expected or permitted to do when such a flag is presented**.

7. Accuracy, false matches and safeguards

Please provide any recorded assessment, testing, audit or monitoring concerning:

- accuracy of data matching;
- false-positive or false-match rates;
- incorrect fraud/risk flags;
- outdated or inaccurate source data;
- bias or discriminatory effects;
- quality assurance; and
- safeguards used to identify and correct errors.

8. Rights of applicants

Please provide any recorded policy or procedure explaining:

- whether applicants are informed that data matching or fraud/risk flagging takes place;

- whether an applicant is informed when a flag materially affects the handling of their application;
- how an applicant can challenge an incorrect match, classification or flag;
- how an applicant can have inaccurate information corrected; and
- whether applicants can obtain meaningful information about the data or output used in relation to them.

9. Retention and audit trail
Please provide the applicable retention periods for:
- information used as inputs to data matching;
- matching results;
- fraud/risk flags;
- classifications or scores;
- verification results; and
- records showing how those outputs were considered by decision-makers.

10. Data-protection and equality governance
Please provide any data-protection, equality, human-rights, governance, audit or risk documentation considering the effect of these processes on DAF applicants.
In particular, please provide any recorded consideration of risks arising from the fact that the DAF is specifically used by people experiencing **financial crisis or other difficult circumstances**.

11. Oversight and accountability
Please identify:
- who within Welsh Government is responsible for oversight of these processes;
- what audits are undertaken;
- how frequently they occur;
- whether contractors' use of applicant data is audited;
- what management information is produced concerning flags/matches; and
- whether Ministers or senior officials receive reporting concerning the operation or risks of these systems.

12. Changes over time
Please provide records showing when data matching and fraud/risk flagging were introduced into the DAF process and any significant subsequent changes to the systems, datasets, rules or governance arrangements. If the processing materially changed after the original decision that a DPIA was unnecessary, please provide any recorded consideration of whether those changes triggered a fresh DPIA assessment.

ATISN 27471

1. History of substantive exclusions
For each substantive EAP exclusion/refusal criterion introduced, removed or materially amended from **2018/19 to the present**, please provide recorded information identifying:

a) the criterion concerned;
b) date introduced or changed;
c) previous and replacement wording where applicable;
d) who or which organisation proposed the change;
e) who recommended it;
f) who authorised/approved it;
g) whether ministerial approval was required or obtained;
h) the recorded policy rationale; and
i) whether the criterion was mandatory or permitted exceptional/discretionary departure.

2. Evidence supporting the decisions
For those introductions or material changes, please provide the contemporaneous records relied upon in deciding to implement them, including relevant:

- research;
- evaluations;
- evidence papers;
- policy/options appraisals;
- equality or other impact assessments;
- consultation findings;
- operational evidence;
- financial analysis; and
- decision papers.

If no research, evidence assessment or impact assessment was undertaken or recorded for a particular substantive exclusion, please state that expressly.

3. Lost/Stolen Money
In relation specifically to the **Lost/Stolen Money** exclusion, please provide:

a) the date it was first introduced;
b) the proposal/recommendation that led to its introduction;
c) the decision record authorising it;
d) the person, team, organisation and/or Minister responsible for approval;
e) the evidence or research relied upon;
f) the recorded policy problem the exclusion was intended to address;
g) any assessment of its fairness, proportionality or effect on genuine applicants experiencing financial crisis;
h) any recorded consideration of how the exclusion was consistent with the purpose of Emergency Assistance Payments where loss or theft itself leaves someone without money for essentials; and
i) any provision permitting departure from the exclusion in exceptional circumstances.

4. Financial considerations and savings
For substantive exclusion/eligibility changes from 2018/19 onwards, please provide any contemporaneous record in which any of the following was an **objective, consideration, expected consequence or identified benefit**:

reducing expenditure; savings; affordability; demand management; demand control; financial sustainability; budget pressure; cost control; reducing awards; reducing approval rates; or remaining within budget.

This includes relevant existing options papers, financial modelling, ministerial/senior-official submissions, meeting papers, contractor recommendations and decision records. For each such proposal, please provide any recorded estimate of:

- applications affected;
- awards prevented/reduced;
- change in approval rate;
- expenditure reduction; and
- expected financial saving.

5. Reviews identifying where DAF expenditure could be reduced
Please provide any report, review, options appraisal, analysis or recommendation from 2018/19 onwards which:

a) examined how DAF expenditure could be reduced or controlled;
b) identified eligibility/exclusion changes capable of reducing expenditure;
c) identified particular application circumstances or award categories as opportunities for savings/demand management; or
d) recommended changes subsequently incorporated into DAF eligibility criteria or the Decision Maker's Guide.

For any responsive document, please provide the resulting decision record showing whether its recommendation was accepted, rejected or modified.

6. Applicant data and research feeding into rule changes
Please provide any report, analysis or management-information product derived from DAF applicant/application data that was subsequently used to recommend, justify, introduce, amend or retain:

- an eligibility criterion;
- an exclusion/refusal criterion;
- an award restriction;
- a demand-management measure; or
- another measure affecting access to DAF assistance.

For each responsive item, please provide the associated recommendation and decision record.

7. Governance and authorisation
Please provide the recorded governance/change-control arrangements showing who has authority to create, amend or remove substantive DAF eligibility/exclusion criteria. In particular, please identify the respective roles of:

- Welsh Ministers;
- Welsh Government officials;

- NEC Software Solutions;
- Family Fund Business Services; and
- any other relevant contractor

in **proposing, analysing, recommending, approving and implementing** such changes.

Please also provide any record from 2018/19 onwards of NEC, Family Fund or another contractor proposing a substantive eligibility/exclusion change, together with Welsh Government's decision upon that proposal.

ATISN 27472

1. Refused applications

For 2024/25, please provide:

a) the total number of DAF applications refused, separately for EAP and IAP;
b) those refusals broken down by every refusal/exclusion reason recorded in the administrative system;
c) for each refusal reason, the number of refused applications for which a requested amount, assessed award value, potential award value or other monetary value is recorded;
d) the aggregate monetary value recorded against refused applications, broken down by refusal/exclusion reason and EAP/IAP; and
e) the aggregate monetary value recorded against **all** refused applications.

Where more than one monetary field exists, please identify what each field represents.

If no aggregate totals under (d) or (e) are presently held, please provide the relevant existing aggregated/anonymised data fields from which those totals can be calculated.

2. The £9.4 million underspend

Please provide:

a) the precise amount of the approximately £9.4 million 2024/25 Financial Inclusion underspend attributable specifically to the DAF;
b) the amount attributable to other Financial Inclusion expenditure;
c) the recorded breakdown explaining how the DAF element of the underspend arose; and
d) the earliest recorded forecast during 2024/25 showing that a material DAF underspend was expected.

3. Relationship between approvals/refusals and the underspend

Please provide any existing recorded analysis, briefing, management information, forecast or modelling examining:

a) whether reduced DAF approval/award rates contributed to the underspend;
b) whether refusal rates or particular refusal/exclusion categories contributed to the underspend;
c) what DAF expenditure would have been had approval/award rates remained at the previous-year, budgeted, forecast or expected level; and

d) the financial effect of the period of reduced approval rates identified in Welsh Government's published material.

4. Decisions taken once the underspend became apparent
Please provide the decision records or briefings showing:

a) what options were considered for using the available DAF funding to assist additional eligible people before the underspend was used elsewhere;
b) whether changing eligibility/exclusion rules, award levels or limits was considered;
c) whether unmet need was assessed;
d) who authorised the subsequent use of the DAF-related underspend elsewhere, and on what date; and
e) the amount of DAF-related funding subsequently applied to each other budget/programme.

Our response

From my preliminary assessment I estimate that it will cost more than the appropriate limit set out in the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004 to answer your request. The appropriate limit specified for central government is £600. This represents the estimated cost of it taking over 24 hours of time to determine whether we hold the information and to thereafter locate, retrieve and extract it.

In considering your request, we have also taken account of the provisions relating to the aggregation of requests. Under the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004, a public authority may aggregate two or more requests where they are made by the same person, or by persons acting in concert or pursuant to a campaign, and relate to the same or similar information. Requests must be received within 60 working days of one another to be aggregated in this manner.

The requests above represent the second, third and fourth request we have received from you on the same subject matter. The other request, which we have responded to is ATISN 27304. We consider that these requests relate to the same or similar information and are therefore capable of being aggregated for the purposes of calculating the cost of compliance.

The Welsh Government has already undertaken substantial work in responding to your previous requests on this topic. Taken together, the work required to identify, locate, retrieve and extract the information falling within the scope of your first request has already reached 16 hours. Compliance with these further requests would require additional searches of information held across a range of records and systems.

Some of the information you have requested concerns information and reports relating to criteria changes to the fund over more than an 8 year period. This would require extensive searches of files related to each year of the fund, by both ourselves and our contractor (who holds some of the information on our behalf).

Having done an initial search on our electronic document storage system there are over 14,325 pieces of information related to DAF criteria, which are stored on our electronic filing system which may or may not be relevant to your request. At an estimate of 2 minutes to interrogate each piece of information to ascertain if it contains relevant information to your request, it would take over 470 hours for one staff member to process your request. This time also does not take into account searching our electronic files for the further information you have requested in relation to data processes and budgets. This would take additional time for one staff member to process your request.

We consider that the combined cost of dealing with this request alongside your first request will exceed the appropriate limit. We are therefore refusing your request under section 12(1) of the Freedom of Information Act 2000. Consequently, I have decided not to provide you with the information you have requested.

You may wish to refine your request by narrowing its scope by being more specific about what information you particularly wish to obtain. If you wish to resubmit a revised request, this will be treated as a new request. We would suggest that before you draft any such revised request you consider what it is you are trying to identify, understand, or what you want an answer to and focus any revised request onto that specific information, rather than asking for everything in the hope it may contain what you are looking for. Whilst AI may be useful in helping you draft a request, it may be easier, and more appropriate, just to put the question/parameters you put into AI to draft your request direct to ourselves in the first place.

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