Dear

ATISN 26353: Nation of Sanctuary Expenditure – Third Sector/community grants (2019–2025)

Thank you for your request which we received on 07/11/2025. You sent a refined request for recorded information under the Freedom of Information Act 2000, following your previous request under reference ATISN 26247.

Specifically, you asked for a list of third sector and community organisations that received funding under the Nation of Sanctuary policy during 1 April 2019 – 31 March 2025. For each award, you asked us to provide:

- 1. Organisation name
- 2. Grant/contract title or programme/stream (e.g. Wales Sanctuary Service, Migrant Integration Wales Framework, Croeso Fund, etc.)
- 3. Purpose/description (1–2 lines)
- 4. Amount awarded and amount paid
- 5. Award date and financial year
- 6. Funding route (grant vs. procurement)
- 7. Any available reference number (grant code/contract ID)

You asked us to supply the information as a CSV or Excel file. You also requested that if a single response would exceed the cost limit, we prioritise disclosure by financial year starting with 2023–24, then 2022–23, then 2019–21; and within each year prioritise awards $\geq £50,000$.

If any of the above is already published, you asked us to provide the URL(s) and the fields needed to identify the relevant entries, in line with the section 16 duty to advise and assist.

Our Response

A copy of the information we have decided to release is set out in **Annex 1**.

I have decided that the information requested is exempt from disclosure under section 38 of the Freedom of Information Act and is therefore withheld. The reasons for applying this exemption are set out in full at **Annex 2** to this letter.

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.

Website: www.ico.org.uk

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

Some of the information you have requested is already publicly available:

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FOI release 23300: Nation of Sanctuary Plan | GOV.WALES - 10 February 2025
FOI release 24359: Nation of Sanctuary | GOV.WALES - 20 February 2025
Written Question - WQ97534 - Welsh Parliament - 6 November 2025
Written Question - WQ94514 - Welsh Parliament - 22 October 2024
Written Question - WQ94513 - Welsh Parliament - 22 October 2024
Written Question - WQ93398 - Welsh Parliament - 14 August 2024
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The information below is provided in relation to third sector and community organisations that received Welsh Government funding under the Nation of Sanctuary policy during 1 April 2019 – 31 March 2025.

1. Organisation name

As stated in your previous request for information under the Freedom of Information Act (<u>ATISN 26247</u> – issued 7 November 2025) I have decided to withhold this information under section 38 of the Freedom of Information Act. The reasons for applying this exemption are set out in full at Annex 2 to this letter.

- 2. Grant/contract title or programme/stream; and
- 3. Purpose/description; and
- 4. Amount awarded and amount paid; and
- 5. Funding route (grant vs. procurement); and
- 6. Any available reference number (grant code/contract ID)

I have decided to withhold this information under section 38 of the Freedom of Information Act, as release of this information would lead to the identification of organisations' names. The reasons for applying this exemption are set out in full at Annex 2 to this letter.

Annex 2 - Application of exemptions/exceptions

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.

We have decided to withhold the following information under **section 38** of the Freedom of Information Act:

- The organisation names of third sector and community organisations that received funding under the Nation of Sanctuary policy during 1 April 2019 – 31 March 2025.
- Details of contracts which is not already in the public domain, which could identify the names of third sector and community organisations, as above.

This Annex sets out the reasons for the engagement of section 38 of the Freedom of Information Act and our subsequent consideration of the Public Interest Test.

Engagement of section 38 (Health and Safety) of the Freedom of Information Act

This exemption states:

- (1) Information is exempt information if its disclosure under this Act would, or would be likely to—
 - (a) endanger the physical or mental health of any individual, or
 - (b) endanger the safety of any individual.

The Commissioner's Guidance on s38 states (inter alia):

Section 38 provides an exemption from disclosing information if it would endanger any individual (including the applicant, the supplier of the information or anyone else). The exemption does not necessarily deal with what are usually thought of as health and safety matters, such as establishing the cause of an accident.

The Welsh Government believes that third sector and community organisation names and details of their contracts, including organisations who expressed Health and Safety concerns, should be exempt from disclosure due to the targeting and direct abuse of organisations linked to the Welsh Government's Nation of Sanctuary policy.

Officials have received evidence detailing how involvement with supporting refugees and asylum seekers in Wales has led to online misinformation, targeting and abuse. This clearly evidences the harms that releasing this information may have on individuals.

Third sector organisations have been targeted for abuse, both online and via threats, and the disclosure of this information is likely to escalate issues, resulting in the

endangerment of both the physical/mental health of funded organisation staff, as well as endangering their safety.

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.

Public interest arguments in favour of disclosure

The Welsh Government acknowledges the general public interest in openness and transparency that release of this information would engender. Further, we recognise there is a public interest in supporting the public to better understand the Nation of Sanctuary policy and approach.

Public interest arguments in favour of withholding

The Welsh Government recognises the general public interest in avoiding prejudice and harm to individuals, which could arise if this information was released. There is a public interest to protect staff and residents at the accommodation, local services, communities and staff working in the third sector. Withholding the information would avoid potential escalation of such risks.

Balance of public interest test

The Welsh Government can see no public interest in allowing prejudice to occur and putting people at risk and so believes the public interest favours withholding under the above stated exemption.