

13 March 2026

Dear

## **ATISN 26725 – Wales Japan Club**

Thank you for your request for information, which I received on 16 February. In your email you asked for the following information:

*Please provide details of any grants, contracts, service-level agreements, or other financial support provided by the Welsh Government to Wales Japan Club (Charity number 1095976) for the financial years 2023/24 and 2024/25 (and, if held, 2022/23 for context).*

*For each instance of funding/support, please include:*

- 1. the programme/scheme name (official title)*
- 2. the Welsh Government department/directorate responsible*
- 3. whether the funding was a grant or a contract (and the procurement/award route, if applicable)*
- 4. the amount(s) and payment date(s)*
- 5. the purpose/outputs/deliverables (including any expected outcomes)*
- 6. any standard and/or specific terms and conditions relevant to equality, accessibility, or inclusion (redacted as necessary)*
- 7. the title/date of the award letter, grant agreement, contract, or related documentation (and copies if available, with personal data redacted)*

## **Response**

The Welsh Government has provided a single grant award to the Wales Japan Club in each financial year covering 2022/23, 2023/24 and 2024/25. The details for all three awards are set out below:

Scheme name/title: Award of Funding to support the Japanese Saturday School  
Department: International Relations  
Funding type: Grant award (paid in arrears)  
Deliverables: - Delivery of weekly Japanese language and cultural classes  
- Maintenance of an educational environment  
- Contribution to cultural understanding and friendship between Japan and the UK

<b>Financial year</b>	<b>Award</b>	<b>Date of Award</b>	<b>Payment Date</b>
2022/23	£21,000	22/06/2022	15/03/2023
2023/24	£21,000	20/06/2023	15/04/2024
2024/25	£21,000	12/02/2025	11/03/2025

The purpose, outputs and terms and conditions of the grants are set out in the enclosed documents at Annex A, B and C. The Wales Japan Club operates in accordance with standard equality and inclusion principles. Personal data has been redacted in accordance with section 40 of the Freedom of Information Act as set out in Annex 1.

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 e-mail: [Freedom.ofinformation@gov.wales](mailto: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  
Telephone: 0303 123 1113  
Website: [www.ico.org.uk](http://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 – Application of Exemptions**

The Freedom of Information Act provides 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:

- The personal data contained in the information you have requested under Section 40 of the Freedom of Information Act 2000 (FoIA) - Personal Data.

This Annex sets out the reasons for the engagement of Section 40 of the FoIA.

### **Engagement of S40(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.

I have concluded that, in this instance, some of the information contained within the information caught by your request contains third party personal data. Specifically, this relates to correspondence containing the name, signature and contact details (telephone and e-mail address) of the Welsh Government official responsible for signing the grant offer letters and the name and contact details for the named person in each company/organisation in receipt of the grant funding, as well as financial information such as bank account details.

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 parties involved in any communication in order to follow the flow of that communication and to understand the views and positions expressed by each party. 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 communications are those of the respective organisations rather than those of the individuals concerned. 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 discussions and to identify the views expressed by each organisation. 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.