

20 April 2026

Dear

### **Request for Information – ATISN 26808**

Thank you for your request which I received on 19 March. The information you requested is enclosed.

**1. Funding amounts awarded to Cardiff Council to implement the 28 April 2020 statutory guidance in relation to Priority Need for street homeless people – broken down by financial year and by funding stream (grant name, grant reference, and payment date).**

Please see attached documents which provide information on the funding amounts awarded and/or paid for the following funding streams:

- Doc 1, 1a and 1b – Local Government Hardship Fund (homelessness element only) which was provided under the Emergency Financial Assistance Scheme in 2020-21 and 2021-22
- Doc 2 – No One Left Out (NOLO) Grant funding provided in 2022-23, 2023-24 and 2024-25.
- Doc 3 – Local Government Revenue settlement – from 2020-21 to 2026-7

**2. Records of conditions, terms, or directions attached to those funds, including grant agreements, memoranda of understanding, letters of expectation, or similar documents between Welsh Government and Cardiff Council relating to use of funds for street homeless protection.**

Please see attached documents which provide information on the terms and conditions, directions or guidance issued for the following funding streams:

- Doc 1e – Local Government Hardship Fund (homelessness element only) which was provided under the Emergency Financial Assistance Scheme in 2020-21 and 2021-22
- Doc 2, 2a, 2b and 2c – No One Left Out (NOLO) Grant funding provided in 2022-23, 2023-24 and 2024-25.

**3. Decision-making records and documentation showing how funds were allocated and authorised within Cardiff Council for the purpose of protecting street homeless people, including minutes, notes, internal reports, and the names and roles of officers or decision-makers involved.**

This information is not held by the Welsh Government

**4. Monitoring, audit, evaluation, and compliance records showing how Welsh Government monitored or audited Cardiff Council's use of the funds, including monitoring returns, audit reports, compliance checks, and any follow-up correspondence.**

Please see attached documents which provide information on relevant monitoring, audit and compliance checks undertaken. This includes copies of relevant funding claims, audit certificates, and progress reports submitted by Cardiff Council, and details of checks and approvals undertaken by Welsh Government.

- Doc 1, 1c and 1d – Local Government Hardship Fund (homelessness element only) which was provided under the Emergency Financial Assistance Scheme in 2020-21 and 2021-22
- Doc 2, 2a, 2b and 2c – No One Left Out (NOLO) Grant funding provided in 2022-23, 2023-24 and 2024-25.

**5. Communications (emails, letters, messages) between Welsh Government and Cardiff Council that refer to the funds, their intended use for street homeless people, or any concerns about Cardiff Council's compliance with the statutory guidance.**

Please see copies of the following letters attached at Doc 4 and Doc 5:

- Doc 4 - Letter sent to all local authorities on 10 September 2020 - Homelessness Phase 1 – Funding to cover additional costs for the remainder of 2020-21
- Doc 5 – Letter sent to all local authorities on 17 August 2022 - Providing emergency temporary accommodation to all people with NRPF.
- Doc 6 – Letter sent to all local authorities on 13 January 2023 – additional funding for homelessness prevention and temporary accommodation.

The documents attached above in response to point 2 and 4 also include specific communication between Welsh Government and Cardiff Council related to the use of the funds.

**6. Any guidance, advice, or instructions issued by Welsh Government to Cardiff Council about reasonable adjustments, identification requirements, or verification processes for street homeless people when accessing services funded under the 28 April 2020 guidance.**

I am not aware of guidance or advice issued since the 28 April 2020 guidance.

**7. Records of complaints, investigations, or internal reviews (Welsh Government or Cardiff Council) specifically referencing the use of funds for street homeless people under the 28 April 2020 guidance.**

I am not aware of any complaints, investigations, or internal reviews by the Welsh Government specifically referencing the use of funds for street homeless people under the 28 April 2020 guidance.

The Welsh Government does not hold any data of complaints, internal reviews or investigation that may have been undertaken by Cardiff Council.

I have decided that information described in the enclosed list at Annex 1 is exempt from disclosure under section 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.

This Freedom of Information disclosure contains material created by third parties outside of the Welsh Government. Copyright of this material remains with the original rights holder. Where third-party copyright applies, permission may be required from the relevant rights holder before re-use.”

## **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](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.

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/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.

I have decided to withhold the following information:

- Personal details of Welsh Government officials below senior civil service level included in Document 1 and Documents 2a, b and c. Including name, contact details, and signature.
- Personal details of staff at Cardiff Council included in Document 1 and Documents 2a, b and c. Including name, contact details, and signature. Except for name of the Chief Executive, which is already in the public domain.

This Annex sets out the reasons for the engagement of section(s) 40 (2) of the Freedom of Information Act.

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:

*"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). 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:-

- **The Legitimate interest test:** Whether a legitimate interest is being pursued in the request for information;

- **The Necessity test:** Whether disclosure of the information/confirmation or denial that it is held is necessary to meet the legitimate interest in question;
- **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 interests**

There appears to be a legitimate interest including broad general principles of accountability and transparency, as well as a case specific interest in knowing how we worked with Cardiff Council to address street homelessness and how Cardiff Council addressed street homelessness in response to the 28 April 2020 guidance note referred to in the request.

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

No. The inclusion of names, signature and contact details of Welsh Government and Cardiff Council junior staff members responsible for day-to-day operations of the funding streams, and senior staff at Cardiff Council where the documents being disclosed containing their details do not demonstrate the decisions made by Cardiff Council to address street homelessness (e.g. signing of grant award letters and audit certificates), is not deemed necessary. This information is not directly related to the specific nature of the request and, as such, is not considered relevant. The request can be adequately addressed without disclosing this specific personal data.

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

As noted above, we do not consider disclosure of the personal data of Welsh Government officials and Cardiff Council staff members is necessary. The disclosure would involve the release of personal data into the public domain, where there would be no control over its further use and could cause unwarranted intrusion and potential distress. The information in scope also contains third-party personal data and the individuals concerned would have a reasonable expectation that their personal data would not be disclosed into the public domain. We therefore consider that the interests and rights of the data subject outweigh any legitimate interest in disclosure, and that releasing the information is not justified.

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