

28 August 2026

Dear

ATISN 27293 – Essential Support Grants (Books Council of Wales)

Information requested

Thank you for your request which I received on 3 August. You asked for:

Information relating to the grant funding of £349,990 awarded by the Welsh Government through Creative Wales to the Books Council of Wales for the Essential Support Grants announced in December 2025:

1. A copy of the grant award letter and any accompanying terms and conditions, including any annexes or schedules setting out the approved funding lines or allocations.
2. Any grant variation letter, revised grant schedule, amended award notification, or written approval recording or authorising any variation, reallocation, transfer or redistribution between the funding lines identified in the grant award letter, together with any document explaining the basis for it.
3. Any correspondence or recorded decision confirming how the separate £15,000 BookTok allocation was administered, including whether it was paid to the Books Council of Wales or retained and administered by the Welsh Government or Creative Wales.
4. Any grant monitoring report, financial reconciliation schedule, end-of-year return, or grant acquittal submitted by the Books Council of Wales in respect of this funding, together with any internal Welsh Government correspondence recording acceptance or sign-off of final expenditure against each funding line. If no such information is yet held because the grant has not reached closure, please confirm this and state when the relevant return is due.

Our response

A copy of the information I have decided to release is enclosed.

1. A copy of the grant award letter and any accompanying terms and conditions, including any annexes or schedules setting out the approved funding lines or allocations.

Answer: Please see Doc 1.

2. Any grant variation letter, revised grant schedule, amended award notification, or written approval recording or authorising any variation, reallocation, transfer or redistribution between the funding lines identified in the grant award letter, together with any document explaining the basis for it.

Answer: Please see the response to Question 1 and information contained in Doc 1. No further information held.

3. Any correspondence or recorded decision confirming how the separate £15,000 BookTok allocation was administered, including whether it was paid to the Books Council of Wales or retained and administered by the Welsh Government or Creative Wales.

Answer: The BookTok allocation was administered to the Books Council of Wales as a grant increase within the 2025-26 financial year. Please see Doc 1.

The £15,000 BookTok allocation was not retained by Creative Wales nor the Welsh Government as it was paid to the Books Council of Wales. Correspondence relating to this is included at Doc 2.

Please also see Doc 3, Doc 4 and Doc 5.

4. Any grant monitoring report, financial reconciliation schedule, end-of-year return, or grant acquittal submitted by the Books Council of Wales in respect of this funding, together with any internal Welsh Government correspondence recording acceptance or sign-off of final expenditure against each funding line. If no such information is yet held because the grant has not reached closure, please confirm this and state when the relevant return is due.

Answer: The Books Council of Wales' claims are verified through the annual audited accounts process; those accounts have not yet been finalised but will be made available online once published at [Corporate Documents & Policies | Books Council of Wales](#).

Please also Doc 3, Doc 4 and Doc 5.

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 A

This Annex sets out the reasons for the engagement of section 40(2) of the Freedom of Information Act and our subsequent consideration of the Public Interest Test.

Engagement of Section 40(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.

We have concluded that, in this instance, some of the information contained within documents caught by your request contain third party personal data. Specifically, this relates to Doc 1 - *Grant offer Letter inc Conditions for 2025 26 - Dec-2025* and Doc 2 - *Confirmation of Spend/Allocation from BCW*, containing a signature and names of Welsh Government officials and officers within the Books Council of Wales.

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:

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 Interest Test

The Welsh Government recognises there is a legitimate interest in being able to identify the officials involved in any communication in order to follow the flow of that communication and to understand the views and positions expressed by each person. 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 emails are those of the Welsh Government and of external organisations. 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 emails and to identify the views expressed by each individual. 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.