

14 September 2026

Dear

Request for information - ATISN 27359

Thank you for your request for information, which I received on 17 August 2026.

Your Request

You asked for the following information regarding a transaction published in the Welsh Government's expenditure over £25,000 data:

[Welsh Government expenditure over £25,000: 2026 | GOV.WALES](#)

Dataset March 2026, Row 84:

- Profit Centre: XH21
- Department: F2EET
- Division: Business Wales
- Expense Type: Current Grants to private sector
- Vendor name: BUSINESS IN FOCUS LTD BREXIT GRANT
- Payment date: 16/03/2026
- Document number: 2003233437
- Amount paid: -100000

1. The name and purpose of the grant, fund or funding arrangement under which this £100,000 payment was made.
2. The date the funding was originally awarded, the total value of the relevant grant or award, and the period to which it relates.
3. A copy of the grant award letter, funding agreement, claim, payment authorisation or equivalent record showing what the £100,000 payment was for.
4. Any recorded information explaining why the payment was made on 16 March 2026, particularly if it relates to a Brexit-related scheme or funding arrangement established in an earlier financial year.
5. Please also confirm what the description "BUSINESS IN FOCUS LTD BREXIT GRANT" represents in the Welsh Government's financial records, including whether this is the name of a particular grant or a legacy vendor/account description.

Our response

The information you requested is enclosed. Please note that personal data has been redacted. Personal information has been withheld under section 40 of the Freedom of Information Act 2000. The full reasoning for applying this exemption is set out in Annex A at the end of this letter.

1. The name and purpose of the grant, fund or funding arrangement under which this £100,000 payment was made:

The Young Person's Start-up Grant is a revenue grant that supports young people under 25 years of age to start a business. The grant supports young people who are not in education, employment or training to start their own business, create a social enterprise, become self-employed, or work as a freelancer or social entrepreneur in Wales. A grant of up to £2,000 is available to help individuals with the essential costs of starting a business. The grant is available alongside a package of support, including one-to-one advice, webinars to build confidence in business practices, and help to develop business start-up plans.

2. The date the funding was originally awarded, the total value of the relevant grant or award, and the period to which it relates:

An award offer of up to £500,000 was made on 16 May 2025 for the period 1 June 2025 to 31 March 2026. The grant is paid in £100,000 instalments when 50% of the previous instalment has been paid to beneficiaries, in accordance with Schedule 4 of the grant award letter.

3. A copy of the grant award letter, funding agreement, claim, payment authorisation or equivalent record showing what the £100,000 payment was for:

Attached are the signed award letter, claim and payment authorisation.

4. Any recorded information explaining why the payment was made on 16 March 2026, particularly if it relates to a Brexit-related scheme or funding arrangement established in an earlier financial year:

This payment does not relate to a Brexit scheme. "BUSINESS IN FOCUS LTD BREXIT GRANT" is the name of the Business in Focus vendor account.

5. Please also confirm what the description "BUSINESS IN FOCUS LTD BREXIT GRANT" represents in the Welsh Government's financial records, including whether this is the name of a particular grant or a legacy vendor/account description:

"BUSINESS IN FOCUS LTD BREXIT GRANT" is the name of the Business in Focus vendor account and does not represent the name of the Young Person's Start-up Grant.

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
CF10 3NQ

or Email: Freedomofinformation@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.

Personal Information

The request you sent contains personal information about you - for example, your name and email address. The Welsh Government will be the data processor for this information and, in accordance with the General Data Protection Regulation, it will be processed in order to fulfil our public task and meet our legal obligations under the Act to provide you with a response. We will only use this personal information to deal with your request and any matters which arise as a result of it. We will keep your personal information and all other information relating to your request for three years from the date on which your request is finally closed. Your personal information will then be disposed of securely.

Under data protection legislation, you have the right:

- to be informed of the personal data we hold about you and to access it
- to require us to rectify inaccuracies in that data
- to (in certain circumstances) object to or restrict processing
- for (in certain circumstances) your data to be 'erased'
- to (in certain circumstances) data portability
- to lodge a complaint with the Information Commissioner's Office (ICO) who is our independent regulator for data protection

For further information about the information which the Welsh Government holds and its use, or if you wish to exercise your rights under the GDPR, please see contact details below:

Data Protection Officer
Welsh Government

Cathays Park
CARDIFF
CF10 3NQ

Email: DataProtectionOfficer@gov.wales

Any information released under the Freedom of Information Act 2000 or Environmental Information Regulations 2004 will be listed in the Welsh Government's Disclosure Log (at <https://gov.wales/about/open-government/freedom-of-information/responses/?lang=en>).

Yours sincerely

Annex A

ATISN 27359 - 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 to the requester, public authorities need to consider the effects of making the information freely available to everyone. Any personal interest the requester has in 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 response 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 the information caught by your request contains third party personal data. Specifically, this relates to names of Welsh Government officials, their e-mail addresses and direct telephone numbers, and also the names and personal data of third parties.

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 most relevant principle in this instance to be 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 that 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 understand the views and positions expressed by each party. We do not believe, however, that 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 not relevant 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 straightforward, even when withholding the personal data, to follow the discussions and 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. Welsh Government officials are not Senior Civil Servants and do not have public-facing roles; therefore, they would not expect their names to be released into the public domain. The Welsh Government officials are not Senior Civil Servants and do not have public facing roles, therefore they would not expect their names to be released into the public domain.

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.