Dear

06 November 2026

ATISN 26-0003 – Student Finance Wales IT support services

Information requested

Thank you for your request which I received on 12 October. You asked for:

Information relating to the arrangements between the Welsh Government and Student Loans Company Limited (SLC) for IT support services at the Student Finance Wales office in Llandudno Junction, making five specific requests:

1. Original agreements and IT support requirements (2006–2014)
2. Current contractual and service requirements
3. Accommodation arrangements following June 2023
4. Proposed outsourcing to Capgemini (2025–2026)
5. Building security and third-party contractor access

Our response

Following searches of the information held by the Welsh Government, we have concluded that we do not hold the information requested at points 1, 2 and 4 of your request.

The Welsh Government sponsors the Student Finance Wales (SFW) service delivery through its relationship with the Student Loans Company (SLC). Under the governance arrangements set out in the SLC Framework Document and associated accountability arrangements, SLC is responsible for the operational management of its business and has autonomy to organise its services, staffing structures, technology arrangements and internal support functions in a manner that enables it to meet its obligations.

The Welsh Government specifies the outcomes and services to be delivered to Welsh students but does not prescribe how SLC structures its operations to achieve those outcomes. This includes decisions relating to IT support models, staffing arrangements, resource deployment, the location of support staff, and whether services are delivered through directly employed staff, remote support arrangements, travelling engineers or third-party contractors.

Accordingly:

Part 1: Original agreements and IT support requirements (2006-2014)

The Welsh Government does not hold the information requested and has not imposed staffing requirements on SLC.

Part 2: Current contractual and service requirements

The Welsh Government does not hold the information requested and does not specify how SLC should organise its IT support arrangements.

Part 4: Proposed outsourcing to Capgemini (2025-2026)

Decisions concerning the organisation and delivery of SLC's internal IT and operational support functions, including the use of outsourcing, are matters for SLC.

The Enable Business Case contains limited references to the Infrastructure & Operations programme. The relevant information captured by your request is shown below; the actual document contains 8,982 words hence a summary has been provided and not a redacted document.

Delivery timelines (Management): • High level delivery timeline • Key milestones	• Transition Technology I&O services to a managed service. • I&O Managed Service is launched in early FY 2026/27;

I&O Managed Service	Managed Service delivery of I&O	Contract Variation with Existing Supplier

The Enable Business Case was produced and approved by DfE and SLC and accepted by shareholders.

If you require further information regarding the context, purpose or meaning of those references, including additional information about the proposed structure and delivery of the I & O programme, you may wish to contact the Department for Education as the originating authority for the document or the Student Loans Company who will be delivering the programme.

You can find more information about Enable in the SLC's Annual Business Plan for 2026-27.

Parts 3 and 5: Accommodation arrangements and building security

The Welsh Government has reviewed the information held that falls within the scope of parts 3 and 5 of your request.

The information identified consists of arrangements relating to the occupation of the building at Llandudno Junction, the provision of building services, and general requirements for individuals requiring access to the Welsh Government estate to undergo appropriate vetting and security checks in accordance with applicable access control procedures.

No information has been identified that specifically addresses:

- ICT support contractors or ICT engineers working within the building;
- the provision of ICT services within the building, including which organisation is responsible for providing those services;
- any requirement for a permanently based ICT engineer;
- vetting, sponsorship or approval processes that apply specifically to ICT contractors engaged by building occupiers; or
- arrangements relating to an individual transferring from employment with the Student Loans Company to employment with an external ICT contractor.

The information reviewed do not distinguish between categories of contractor or service provider and instead set out general requirements for access to Welsh Government premises. Contractors attending a Welsh Government site must firstly adhere to any conditions imposed on them by the contracting tenant, and then subsequently the more general conditions for access to Welsh Government buildings.

I have included a copy of the Welsh Government policy; however, I have concluded that some of the information from the Welsh Government Vetting Policy is exempt from disclosure under Section 31(1)(a) of the Freedom of Information Act 2000. Further details on this exemption are provided at Annex 1.

I would encourage you to reach out to the SLC for further information about any conditions they may impose.

Accordingly, the Welsh Government does not hold recorded information that would answer the specific questions raised regarding ICT contractors, ICT service provision, or contractor vetting arrangements for tenants occupying the building.

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 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.

I note you have also written to the Deputy Minister for Skills and Tertiary Education, a separate reply will be issued.

I appreciate you may have been expecting a lot more information to be provided through this request; you may wish to seek more specific information direct from the SLC.

Yours sincerely

Annex 1:
Section 31(1)(a) – prevention or detection of crime

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 withheld the number of clauses from the Welsh Government Vetting Policy under section 31(1)(a) of the Freedom of Information Act 2000 (FOIA). Section 31(1)(a) provides an exemption where disclosure would, or would be likely to, prejudice the prevention or detection of crime.

The withheld information relates to the operational application of the Welsh Government's personnel security and vetting arrangements. It provides detail about the circumstances in which particular checks and levels of security clearance are required, how those requirements are applied, exceptions to standard procedures, and the security controls applied in particular circumstances.

Disclosure of the withheld information could enable individuals to circumvent vetting requirements, thereby increasing the risk of insider activity.

I consider that disclosure of this information would be likely to prejudice the prevention of crime. In reaching this conclusion, I have considered the prejudice test as follows:

The interest which could be harmed
The interest requiring protection is the effectiveness and integrity of the Welsh Government's personnel security and vetting arrangements. These arrangements are intended to ensure that appropriate checks and security controls are applied to individuals who may have access to Welsh Government buildings, IT systems, sensitive information and other government assets. Disclosure of the withheld information could undermine those arrangements by providing operational detail about how vetting requirements and associated security controls are applied.

The nature of the prejudice
The withheld information provides details about the operation and application of the Welsh Government's vetting arrangements, including the circumstances in which particular checks and levels of clearance are required, exceptions to standard procedures, when previous checks may be relied upon, transfer arrangements and the controls applied where normal vetting requirements have not yet been completed.

While individual pieces of information may appear innocuous in isolation, when considered collectively they could provide a detailed picture of how the Welsh Government's personnel security controls operate.

Disclosure could therefore assist an individual seeking to circumvent or exploit those controls by providing information about their operation and boundaries. This could enable an individual to tailor their actions or circumstances in an attempt to avoid or reduce scrutiny and potentially obtain access to Welsh Government buildings, IT systems, information or assets.

There is consequently a direct link between disclosure of the withheld information and the potential prejudice to the prevention of crime. The Information Commissioner's Office recognises that section 31(1)(a) can apply to information about an organisation's own security procedures where disclosure would make it more vulnerable to crime.

Likelihood of the prejudice occurring
The Welsh Government considers that disclosure would be likely to prejudice the prevention of crime. The risk is not considered remote or purely hypothetical. The information concerns the practical operation of personnel security controls which are designed, among other things, to mitigate the risk of inappropriate or unauthorised access. Someone wishing to circumvent those controls could use the information to develop a greater understanding of how the vetting process operates, including where different requirements apply and the circumstances in which exceptions or alternative arrangements may be permitted. There is also a potential mosaic effect. Information which appears relatively harmless in isolation could become more significant when combined with other information already available in the public domain. The cumulative information could enable an individual to build a more comprehensive understanding of Welsh Government's personnel security arrangements and identify potential opportunities to circumvent them.

Public interest test
Section 31 is a qualified exemption. It is therefore necessary to consider whether, in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosure. There is a clear public interest in openness and transparency concerning the Welsh Government's personnel security arrangements. This must, however, be balanced against the public interest in ensuring that security controls remain effective and that information which could assist individuals in circumventing those controls is not placed into the public domain.

Factors favouring disclosure
There is a public interest in:

- promoting openness and transparency about the Welsh Government's policies and procedures;
- enabling the public to understand how the Welsh Government manages personnel security risks;
- providing assurance that appropriate checks are undertaken before individuals are given access to Welsh Government buildings, IT systems and information;
- demonstrating that vetting requirements are applied consistently and proportionately;
- enabling scrutiny of the Welsh Government's approach to security vetting; and

- increasing public confidence that appropriate safeguards are in place to protect government information and assets.

There is therefore a legitimate public interest in making information about the overall framework and principles of the vetting policy available.

Factors favouring maintaining the exemption
There is a strong public interest in:

- protecting the effectiveness and integrity of Welsh Government's personnel security arrangements;
- preventing disclosure of operational information that could assist individuals in understanding how to circumvent or exploit vetting controls;
- avoiding the identification of circumstances in which standard vetting requirements may be varied, delayed, transferred or otherwise dealt with differently;
- preventing individuals from using detailed knowledge of vetting requirements to tailor their behaviour or circumstances to avoid additional scrutiny;
- reducing the risk of unauthorised or malicious access to Welsh Government buildings, systems, information and assets;
- protecting the Welsh Government and its staff from insider threats and other criminal activity;
- avoiding the cumulative or mosaic effect created by combining the withheld information with information already publicly available; and
- maintaining public confidence in the Welsh Government's ability to protect its people, information, systems and assets.

There is a particularly strong public interest in ensuring that measures designed to prevent inappropriate or malicious access remain effective, rather than disclosing operational detail that could reduce their effectiveness.

Conclusion
The Welsh Government recognises the public interest in transparency regarding its approach to personnel security and vetting. This interest can be met, to a significant extent, through the disclosure of information explaining the purpose, principles and general framework of the vetting policy. However, this must be balanced against the significantly stronger public interest in protecting information that provides operational detail about how vetting controls are applied in practice.

Disclosure of the withheld information could assist an individual to understand the boundaries of those controls, identify circumstances in which different requirements or exceptions apply and potentially tailor their actions in an attempt to circumvent or exploit the vetting process. When combined with other publicly available information, disclosure could provide an increasingly detailed picture of the Welsh Government's personnel security arrangements.

The Welsh Government therefore considers that disclosure would be likely to prejudice the prevention of crime and that, in the circumstances of this case, the public interest in maintaining the exemption under section 31(1)(a) of the Freedom of Information Act 2000 outweighs the public interest in disclosure. Freedom of Information Act 2000, section 31(1)(a).