

Reference FOI 25-041

01 October 2025

Steel City House
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Sheffield S1 2GQ

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british-business-bank.co.uk
@britishbbank

Dear

Thank you for the freedom of information request received by the British Business Bank (the Bank) on **04 September 2025**.

1. Your request

“Dear British Business Bank,

I would like to request the following information under the Freedom of Information Act related to start-up loans applied for and which sector they are in.

For each of the past five full financial years (2020/21 to 2024/25), please tell me per local authority:

- 1) The total number of applications received for a start-up loan, per local authority
- 2) The total number of applications by sector for a start-up loan (not broken down by local authority)

If this information is not retrievable within the allocated time period you are obliged to respond, please make the following amendment:

For Question 2) please tell me the 10 most common sectors of applications for start-up loans in the past five full financial years combined. If this is still not retrievable, then please ignore Question 2.

Preferred format: machine readable (Excel/ CSV/ Word).”

2. Response

- 2.1. Under the Freedom of Information Act 2000 (‘FOIA’ or the Act), you have the right to know whether we hold the information you require and be provided with that information (subject to any exemptions under the Act which may apply).
- 2.2. We can confirm the Bank does hold the requested information, however, after careful consideration, we have decided that some information be exempt under FOIA section 40(2) (personal information).
- 2.3. When we apply an exemption, we are required to explain what the exemption is and why it applies.

3. Section 40 exemption (Personal Information)

- 3.1. Section 40(2) provides that information is exempt from disclosure if it constitutes personal data of an individual, other than the requester, and that the disclosure to any member of the public would contravene one of the data protection principles in Article 5 of the UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA).
- 3.2. Section 3(2) of the Data Protection Act 2018 defines personal data as: “any information relating to an identified or identifiable living individual”; an identifiable living individual is someone who can be identified, directly or indirectly, by reference to an identifier.
- 3.3. Statistical data attracts the risk of re-identifying individuals when a category or section of a dataset contains small numbers. In relation to your request, the Bank has decided to redact data from both tabs. If the number of loans issued to individuals is less than ten in any of the entries, then the data has been redacted. Although the data does not include direct personal identifiers such as names, etc, the disclosure of very small numbers could allow individuals to be indirectly identified, particularly when combined with other publicly available information.
- 3.4. Therefore, we have concluded that disclosing this data would contravene the first data protection principle under Article 5(1)(a) of the UK GDPR, which requires personal data to be processed lawfully, fairly and transparently. There is no strong legitimate interest that would override the prejudice that disclosure would cause to the rights and freedoms of those applicants.
- 3.5. In deciding whether it would be unfair to release this information we have considered;
 - a) the possibility of re-identification: and
 - b) the reasonable expectations of the applicants in applying for a Start-up Loan.
- 3.6. While members of the public are unlikely to be able to make inferences about applicants if we disclosed the information requested, we must consider whether other people may have specific knowledge which would allow inferences about the applicants.
- 3.7. The applicants’ family or friends, or anyone else who might engage with those applicants may have information which, in conjunction with the information requested, could be used to identify an applicant and/or make inferences about that applicant. This is also known as the mosaic or jigsaw effect. [Information in the public domain | ICO](#)
- 3.8. The privacy policy on the Start-up Loans website makes applicants aware that British Business Bank is subject to the FOIA and that the Section 40 exemption, although not absolute, is applicable where a disclosure would contravene data protection. <https://www.startuploans.co.uk/privacy-policy>
- 3.9. Section 40(2) is an absolute exemption, so there is no need to apply the public interest test

4. Please find attached the request data, in an MS Excel workbook.

- 4.1. The Bank has identified applications received as applications submitted to us from the Start Up Loan web portal and a credit check is performed on the applicant (regardless of outcome).
- 4.2. The workbook has two tabs:
 - **Local Authority.** A breakdown of Start Up Loan applications over the previous five financial years, by local authority and financial year.
 - **Sector.** The total applications received, by sector, over the previous five years
- 4.3. Data has been redacted from the Local Authority tab. The data is low in number (less than ten each year). The redaction is to prevent the identification of individuals, should the data be combined with data from other sources.
- 4.4. Start Up Loans are personal loans for business use. The sector data is completed by the loan applicants. As the data is for applications received many of the applications do not progress to payment. For these applications the sector data may not have been completed by the loan applicants.

If you have any queries about the handling of your request, please let us know.

If you are dissatisfied with the handling of your request, you have the right to ask for an internal review. Internal review requests should be submitted within 40 working days of the date of receipt of the response to your original letter and should be addressed to:

FOI Officer,
British Business Bank,
Steel City House,
West Street,
Sheffield,
S1 2GQ or
foirequests@british-business-bank.co.uk.

Please remember to quote the reference number above in any future communications.

If you are not content with the outcome of the internal review you may apply directly to the Information Commissioner's Office (ICO) for a decision. In most cases the Information Commissioner's Office cannot make a decision unless you have already exhausted the Bank's internal review procedure.

The ICO can be contacted at:

The Information Commissioner's Office,
Wycliffe House,

Water Lane,
Wilmslow,
Cheshire
SK9 5AF or
see their website for alternative contact details: www.ico.org.uk.

Yours sincerely,

FOI Officer
British Business Bank