

<b>Reference:</b>	FOI.19634.26
<b>Subject:</b>	Salary sacrifice schemes
<b>Date of Request:</b>	17 February 2026

**Requested:**

1. For the last completed financial year, please provide:

The number of employees excluded from salary sacrifice schemes due to national minimum wage compliance, broken down by Agenda for Change band.

**Response:**

1. Hywel Dda University Health Board (UHB) offers four (4) salary sacrifice schemes:

- Home Technology
- Cycle to Work
- Car lease
- Annual leave purchase

The UHB does not hold all the information requested as the Home Technology and Cycle to Work salary sacrifice schemes are managed by NHS Wales Shared Services Partnership (NWSSP). We therefore recommend that you contact the Freedom of Information team in NWSSP who may be able to assist you further with this part of your request. Contact details are as follows:

Email: [shared.services@wales.nhs.uk](mailto:shared.services@wales.nhs.uk) or alternatively in writing to: NWSSP, Information Governance Manager, 4-5 Charnwood Court, Heol Billingsley, Parc Nantgarw, Cardiff, CF15 7QZ.

The salary sacrifice car scheme is managed by an external provider, Knowles, who do not retain information relating to failed applications.

To explain, the process of applying for salary sacrifice cars is completed by the employee via an automated online form directly to the external provider. During the process the employee will enter their pay details and those of any other salary sacrifice schemes they may be a part of. The system will then undertake an automatic national minimum wage (NMW) checks, calculating whether or not the employee meets the NMW criteria.

If the employee fails the NMW check, they will not be able to proceed with the application process. Only the employee applying for the salary sacrifice car will know if they have not been approved.

If the employee's application is not approved, the system removes the failed application, enabling the employee to submit further applications, for a 'cheaper' vehicle which would meet the NMW threshold.

However, the UHB provides within the table below, the information it holds for the number of employees excluded from the annual leave purchase salary sacrifice scheme, due to NMW compliance, by A4C pay band, during the 2025/26 financial year.

<b>A4C pay band</b>	<b>Number</b>
Band 2	22
Band 3	*

Where the figure in the table has been replaced with an asterisk (\*), the UHB is unable to provide you with the exact number of employees due to the low number of cases (less than 5), as there is a potential risk of identifying individuals if this was disclosed. The UHB is therefore withholding this detail under Section 40(2) of the Freedom of Information Act 2000 (FoIA). This information is protected by the Data Protection Act 2018 (DPA)/UK General Data Protection Regulations (UK GDPR), as its disclosure would constitute unfair and unlawful processing and would be contrary to the principles and articles of the UK GDPR. This exemption is absolute and therefore, there is no requirement to apply the public interest test.

In reaching this decision, the DPA and UK GDPR define personal data as data that relates to a living individual who can be identified solely from that data or from that data and other information, which is in the possession of the data controller.