SECTION 1. WHAT ACTION IS THE WELSH GOVERNMENT CONSIDERING AND WHY?

1.1 INTRODUCTION

Everyone has the right to be safe, to be themselves and to lead lives free from discrimination. Equality and inclusion are core values of the Welsh Government and our commitment to social justice means that we must do all that we can to protect human rights and value diversity in Wales. As we emerge from the COVID-19 crisis, these values are needed more so than ever to create a fairer, more prosperous and a more equal Wales.

The past 30 years have seen a significant strengthening of equality for lesbian, gay, bisexual, transgender and queer/questioning (LGBTQ+) people in Wales and across the UK.

Changes to legislation have meant that schools, organisations and public services are now doing much more to tackle LGBTQ+ bullying and discrimination. Equal marriage and adoption rights are now a reality for many, and Section 28 (a law passed in 1988 that stopped councils and schools "promoting the teaching of the acceptability of homosexuality as a pretended family relationship) has been consigned to history.

However, discrimination remains a reality in the lives of many LGBTQ+ people. More work is needed to address the structural inequalities that blight their life-chances, prospects, and outcomes.

The Welsh Government wants every LGBTQ+ person to live as full lives as possible – to be healthy, to be happy and to be safe. We have worked with a wide range of partners to create *an LGBTQ+ Action Plan*. This ambitious, cross-government plan sets out the concrete steps we propose to take to improve the life conditions of LGBTQ+ people, to challenge discrimination and to create a society where LGBTQ+ people are safe to live and to love authentically, openly, and freely as themselves.

1.2 DEMOGRAPHIC BASELINE

We have seen a huge shift in positive attitudes towards LGBTQ+ communities and for LGBTQ+ inclusion. This may be reflected by the proportion of the Welsh population identifying as lesbian, gay or bisexual (LGB), which has steadily increased from 1.3% in 2012 to 2.0% in 2017¹. While these successes are to be celebrated, there is still more work to be done.

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¹ ONS (2017) Sexual orientation, UK: 2017. https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/sexuality/bulletins/sexualidentityuk/2017

In 2019 the Annual Population Survey (APS) reported that amongst the Welsh population over the age of 16, 94.4% identified as heterosexual, 1.9% gay/lesbian, 1.0% bisexual, 1.0% 'other' and 1.7% did not provide an answer (StatsWales, 2021²). This is a 1.3% increase in LGB identification since 2014 (from 1.6% in 2014 to 2.9% in 2019). However, it is important to note that large-scale population surveys like the APS are likely to underreport how many people identify as LGBTQ+, for example participants may not want to disclose their gender and sexual identity on official statistics, along with other methodological challenges (See Jans, Wilson and Herman, 2018³).

The National LGBT survey provided participants the option to define themselves which allows the tracking some of the identities not accounted for in the APS (Government Equalities Office, 2018⁴). Of their Welsh LGBTQ+ sample, 61.3% identified as gay or lesbian, 26.1% as bisexual, 1.8% as asexual, 4.3% as pansexual, 1.1% as queer and 2% as other.

Until the release of the 2021 Census, there are no official statistics which record the number of trans people in England and Wales. It has been cautiously estimated there are around 200,000-500,000 people who identify as trans in the UK (Government Equalities Office, 2018⁵).

The ONS does not publish data on how many intersex babies are born due to the small number who are registered as intersex on their birth certificates (ONS, 2017⁶). Therefore, estimates for intersex populations vary. For example, a heavily cited estimate suggested the worldwide prevalence of intersex people was up to 1.7% (OHCHR, 2019⁷).

² Sexual identity by year (gov.wales)

³ Full article: Measuring Aspects of Sexuality and Gender: A Sexual Human Rights Challenge for Science and Official Statistics (bath.ac.uk)

⁴ National LGBT Survey: Summary report (publishing.service.gov.uk) -> National LGBT Survey Data Viewer - GOV.UK (www.gov.uk)

⁵ Trans people in the UK (publishing.service.gov.uk)

⁶ Number of babies with intersex traits - Office for National Statistics (ons.gov.uk)

⁷ BackgroundNoteHumanRightsViolationsagainstIntersexPeople.pdf (ohchr.org)

1.3 SUSTAINABLE DEVELOPMENT PRINCIPLES

LONG-TERM

The Action Plan pays particular attention to the diversity of LGBTQ+ people's specific needs and vulnerabilities, including those experiencing intersectional discrimination. It takes specific account of trans and non-binary people, who are among the least accepted groups in society and generally experience more discrimination and violence than others in the LGBTQ+ communities. Discrimination is often multidimensional, and the plan takes an intersectional approach to pave the way to sustainable and respectful changes in society.

In considering the recommendations issued by the UN High Commissioner for Human Rights⁸ and the UN Independent Expert on Sexual Orientation and Gender Identity (IESOGI)⁹, the LGBTQ+ Action Plan proposes an overarching set of aims to improve the recognition of LGBTQ+ people.

It includes a wide range of policy-specific actions relating to education, improving safety, housing, health and social care, and promoting community cohesion. This impact assessment will provide high-level considerations of the Action Plan as a whole and relevant departments may need to carry out further impact assessments to progress individual actions during the life of the plan. The impacts of the plan will be kept under review and further assessment may be carried out as needed.

While this is the first policy framework to focus on the specific needs and vulnerabilities of LGBTQ+ people, it sits inside a wider approach to mainstream equality and strengthen human rights protections for everyone. As such, it should be read alongside our Strategic Equality Plan, , Anti-racist Wales Action Plan, Framework for Action on Disability, and Gender Equality Plan (Welsh Government 2020a).

PREVENTION

In line with our commitment to create a more equal Wales, the plan will draw attention to strengthening human rights, mainstreaming equality and prioritising preventative, cross-government actions that help to

⁸ UN OHCHR (2015) Discrimination and violence against individuals based on their sexual orientation and gender identity: Report of the Office of the United Nations High Commissioner for Human Rights http://daccess-ods.un.org/access.nsf/Get?Open&DS=A/HRC/29/23&Lang=E
⁹ UN OHCHR (2021) Independent Expert on sexual orientation and gender identity.

https://www.ohchr.org/en/issues/sexualorientationgender/pages/index.aspx

create positive culture change and address LGBTQ+ inequalities for the longer-term. These inequalities are examined in detail in Section 2.

INTEGRATION

This proposal connects and contributes to different previous public policy agendas and generates multiple benefits, in particular:

- The Strategic Equality Plan¹⁰
- Strengthening Equality and Human Rights Review
- Advancing Gender Equality in Wales Plan¹¹
- Prosperity for All: economic action plan¹²
- Anti-racist Action Plan Wales¹³
- Diversity in Democracy Action Plan¹⁴
- Education in Wales: Our National Mission¹⁵
- Nation of Sanctuary Refugee and Asylum Seeker Plan¹⁶
- Action for Independent Living Plan¹⁷
- Diversity in Public Appointments Strategy¹⁸
- A Healthier Wales¹⁹
- Strategy for Preventing and Ending Homelessness²⁰

¹⁰Welsh Government (2020) *Strategic Equality Plan 2020-2024* https://gov.wales/sites/default/files/publications/2020-04/strategic-equality-plan-equality-aims-objectives-actions-2020-

^{2024.}pdf#:~:text=The%20Welsh%20Government%20Strategic%20Equality%20Plan%20aims%20to,Equality%20Act%202010%20%28 Statutory%20Duties%29%20%28Wales%29%20Regulations%202011.

¹¹ Welsh Government (2020) Advancing Gender Equality in Wales Plan https://gov.wales/sites/default/files/publications/2020-03/advancing-gender-equality-

plan.pdf#:~:text=The%20aim%20of%20the%20Advancing%20Gender%20Equality%20in,Wales%20when%20developing%20and%20i mplementing%20policy%20and%20practice.

12 Welsh Government (2019) *Prosperity for All: Economic Action Plan* https://gov.wales/sites/default/files/publications/2019-

Welsh Government (2019) Prosperity for All: Economic Action Plan https://gov.wales/sites/default/files/publications/2019-02/prosperity-for-all-economic-action-plan.pdf

¹³ Welsh Government (2021) An Anti-Racist Wales: The Race Equality Plan for Wales [draft status]

https://gov.wales/sites/default/files/consultations/2021-03/race-equality-action-plan-an-anti-racist-wales_2.pdf

¹⁴ Welsh Government (2020) Written Statement: Phase Two - Diversity in Democracy Programme Action Plan https://gov.wales/written-statement-phase-two-diversity-democracy-programme-action-plan

¹⁵ Welsh Government (2020) *Education in Wales: Our National Mission* https://gov.wales/sites/default/files/publications/2020-10/education-in-Wales-our-national-mission-update-october-2020.pdf

¹⁶Welsh Government (2019) Nation of Sanctuary Refugee and Asylum Seeker Plan

https://gov.wales/sites/default/files/publications/2019-03/nation-of-sanctuary-refugee-and-asylum-seeker-

plan_0.pdf#:~:text=The%20%E2%80%98Nation%20of%20Sanctuary%E2%80%99plan%20outlines%20the%20breadth%20of,relations %20between%20these%20communities%20and%20wider%20society%20improved

¹⁷ Welsh Government (2019) Action on Disability: The Right to Independent Living Framework and Action Plan

https://gov.wales/sites/default/files/publications/2019-09/action-on-disability-the-right-to-independent-living-framework-and-action-plan.pdf#:~:text=The%20Welsh%20Government%E2%80%99s%20Framework%20for%20Action%20on%20Independent,access%20to %20the%20same%20opportunities%20as%20everyone%20else.

¹⁸ Welsh Government (2020) Diversity and inclusion strategy for public appointments

https://gov.wales/sites/default/files/publications/2020-02/diversity-and-inclusion-strategy-for-public-appointments-

summary.pdf#:~:text=This%20paper%20is%20a%20summary%20of%20the%20Diversity,disabled%20people.%20This%20Strategy%2 0was%20based%20on%20engagement

¹⁹ Welsh Government (2019) A Healthier Wales https://gov.wales/sites/default/files/publications/2019-10/a-healthier-wales-action-plan.pdf

²⁰ Welsh Government (2019) *Strategy for Preventing and Ending Homelessness* https://gov.wales/sites/default/files/publications/2019-10/homelessness-strategy.pdf

• Youth Work Strategy for Wales²¹.

It is important that policy leads are aware of *the LGBTQ+ Action Plan* and how it connects to existing and future strategies and policies intending to improve social well-being. Other policies and strategies should also consider the specific needs and vulnerabilities of LGBTQ+ people and refer to the plan as part of their commitments to mainstream equality.

COLLABORATION AND INVOLVEMENT

The Welsh Government commissioned Stonewall Cymru in summer 2020 to carry out initial engagement with stakeholders to explore what important themes could be included in any new LGBTQ+ Action Plan for Wales. Stonewall Cymru captured over 600 LGBTQ+ people's lived experiences via a survey and a series of virtual focus groups. Some of the key messages from this engagement focused on tackling LGBTQ+ discrimination, improving safety and addressing health inequalities, particularly trans health.

In November 2020, the Welsh Government established an LGBTQ+ External Reference Group to provide advice and guidance to the Welsh Government supporting the work of the LGBTQ+ policy team. Membership of this group included individuals and representatives from:

- Aberystwyth University
- Bi Cymru
- End Youth Homelessness
- Gisda
- Glitter Cymru
- Hidayah
- LGBT Sport Cymru
- Pride Cymru
- Rainbow Newport
- Romani and Cultural Arts Company
- South Wales Trans and Non-binary Mutual Aid
- Stonewall Cymru
- Swansea Pride
- The Gathering
- Transgender Support Wrexham
- Umbrella Cymru
- Unique Trans Gender Network
- University of South Wales

²¹ Welsh Government (2019) *Youth Work Strategy for Wales* https://gov.wales/sites/default/files/publications/2019-06/youth-work-strategy-for-wales.pdf

- Viva
- Wales Equality Alliance
- Welsh Gender Service
- Welsh Trans Alliance
- WEN Wales
- West Wales Domestic Abuse Service.

In January 2021, a smaller Independent LGBTQ+ Expert Panel was established to build on Stonewall Cymru's initial stakeholder engagement and provide strategic advice on advancing LGBTQ+ equality in Wales. The Panel consisted of individuals and representatives from:

- Cardiff Race Equality First
- Cardiff University
- Glitter Cymru
- NHS Wales
- PRIDE Cymru
- Stonewall Cymru
- Swansea University
- Welsh Gender Service.

The Welsh Government also commissioned Stonewall Cymru to carry out further stakeholder engagement sessions to support the Independent Expert Panel's consideration of the intersectional experiences of LGBTQ+ people. The arrangements included virtual roundtable focus groups (representing LGBTQ+ young people, older people, disabled people and people from Black, Asian and Minority Ethnic communities) and some additional discussions with organisations including the Wales TUC, WEN Wales and LGBT Helpline Cymru.

The Panel issued 61 recommendations and presented their report to the then Deputy Minister and Chief Whip at the end of March 2021. The report included a set of overarching recommendations focusing on the incorporation of human rights into domestic law, strategic coordination and integration of plans, and training, awareness-raising and capacity building. The report also issued thematic recommendations for a broad range of policy areas, including recognition of trans and non-binary people, safety, home and communities, health and social care, education and lifelong learning, workplace and supporting the COVID-19 response. These recommendations have formed the basis of the draft Action Plan.

A full public consultation on the draft Action Plan was carried out in 2021. The consultation was promoted through all equality's stakeholders and via the Welsh Government website and social media platforms.

Accessible versions of the Action Plan and Consultation document were available as follows:

• Easy Read Version

- Children and Young People's Version
- British Sign Language (BSL) video with bilingual subtitles

Feedback from any organisations and individuals with an interest in the LGBTQ+ Action Plan was considered carefully to ensure that it is not only an ambitious plan but that it takes into consideration the advancement of equality for all in Wales and does not erode the rights of any group. This Integrated Impact Assessment has been reviewed and updated considering the results of the consultation.

1.4 IMPACT

The Welsh Government's position is clear: LGBTQ+ rights are human rights. Our LGBTQ+ Action Plan signals our commitment to respecting, protecting and fulfilling the rights of LGBTQ+ people in Wales. It is underpinned by the rights-based approach set out by the UN High Commissioner for Human Rights²² and the UN Independent Expert on Sexual Orientation and Gender Identity (IESOGI)²³. It supports the progressive realisation of rights guaranteed to LGBTQ+ people by the:

- European Convention on Human Rights and the Human Rights Act 1998
- Universal Declaration of Human Rights (UDHR)
- International Covenant of Economic, Social and Cultural Rights (ICESCR)
- International Covenant on Civil and Political Rights (ICCPR)
- United Nations Convention on the Elimination of All Forms of Discrimination against Women (CEDAW)
- United Nations Convention on the Rights of the Child (UNCRC)
- United Nations Principles for Older Persons (UNPOP).

In doing so, the Action Plan will have a significant positive impact on the lived experiences of LGBTQ+ people and will improve outcomes across a wide range of policy areas including education, health and justice. It will be a major contributor to how the Welsh Government exercises its Public Sector Equality Duty function under section 149 of the Equality Act 2010. While this is the first policy framework to focus on the specific needs and vulnerabilities of LGBTQ+ people, it forms part of a wider approach to mainstream equality and strengthen human rights protections for everyone. As such, it should be read alongside our Strategic Equality Plan, Anti-

²² UN OHCHR (2015) Discrimination and violence against individuals based on their sexual orientation and gender identity Report of the Office of the United Nations High Commissioner for Human Rights https://www.un.org/en/ga/search/view_doc.asp?symbol=A/HRC/29/23&referer=/english/&Lang=E

²³ UN OHCHR (2021) *Independent Expert on sexual orientation and gender identity* https://www.ohchr.org/en/issues/sexualorientationgender/pages/index.aspx

racist Wales Action Plan, Framework for Action on Disability, and Gender Equality Plan (Welsh Government 2020a).

Despite public attitudes to transgender people being broadly positive²⁴, it is recognised it may be perceived that the draft LGBTQ+ Action Plan (particularly trans recognition and trans-inclusive policies) has potential to negatively impact some rights of those with other protected characteristics.

The main thrust of concerns expressed by some people, centres on the perceived conflation of 'sex' and 'gender' in government policy and how the perceived misinterpretation of these characteristics (protected by the Equality Act 2010) could roll back protections for women and girls. Some examples of concerns already expressed and considered include fears there would be limits on access to women's safe spaces resulting in increased risk of abuse to women, limits on freedom of expression and an erosion on the rights of women and girls.

The Welsh Government has considered these concerns and is of the view that support for trans people and publishing an LGBTQ+ Action Plan will not result in the erosion of the rights of women and girls, rather it forms part of our approach to strengthen equality and human rights protections for everyone. Extending non-binary and trans-inclusive protections through the LGBTQ+ Action Plan will sit in line with the obligations laid down by the United Nations Convention on the Elimination of Discrimination against Women (CEDAW)²⁵ ²⁶. The UN IESOGI supports this position, in their thematic report on Gender Identity they conclude and recommend:

[para.84]: "The work to address and ultimately eradicate violence and discrimination based on sexual orientation and gender identity is not in opposition to the human rights of women; on the contrary, these areas of concern are largely overlapping and conceptually, socioeconomically, politically and legally reinforce each other.

[para.91]: ... States [should] provide access to legal recognition of gender identity in a manner consistent with the rights to freedom from discrimination, equal protection of the law, privacy, identity and freedom of expression, and adopt all necessary measures so that such recognition:

- a) Is based on self-determination by the applicant;
- b) Is a simple administrative process;

 $https://www.equalityhuman rights.com/sites/default/files/attitudes_to_transgender_people.pdf$

²⁴ EHRC (2020) Attitudes to transgender people

²⁵ UN OHCHR (1979) Articles 1 and 2 of UN CEDAW https://www.ohchr.org/EN/ProfessionalInterest/Pages/CEDAW.aspx

²⁶ UN Committee on the Elimination of Discrimination against Women (2010) General Recommendation No. 28 on the core obligations of State parties under article 2 of the Convention on the Elimination of All Forms of Discrimination against Women https://documents-dds-ny.un.org/doc/UNDOC/GEN/G10/472/60/PDF/G1047260.pdf?OpenElement

- c) Is not connected with abusive requirements, such as medical certification, surgery, treatment, sterilization or divorce;
- d) Includes the acknowledgement and recognition of non-binary identities in their full diversity and specificity;
- e) Ensures that minors have access to recognition of their gender identity." ²⁷

In respect of trans-inclusion limiting access to women's safe spaces, there is a lack of any evidence around the actual experienced impacts of trans-inclusion in services²⁸. The Welsh Government has identified no evidence to justify a blanket exclusion of trans women from services or spaces and a legal challenge brought in AEA v EHRC was refused permission to judicially review the guidance relating to single sex services. Evidence instead highlights the need for individual assessments and tailoring services for each individual's needs²⁹. The Equality Act already allows trans people to be excluded from single-sex services under certain circumstances³⁰. However, such exclusion should be considered on a case-by-case basis and should only be exercised as a proportionate of way achieving a legitimate aim. This is supported by the view of the UN IESOGI:

[para. 40]: "the evidence does not support the contention that legal recognition of gender identity can be seen as contrary to the struggle for equality, to the rights of women or to the rights of cis women. The Independent Expert is not persuaded by the allegation that these arguments are grounded in human rights-based approaches. They overwhelmingly appear to rely on anecdotal evidence, some of which would relate to some allegations of abuse, but most of which build on deeply discriminatory stereotypes of trans and gender-diverse persons, and overwhelmingly of trans women. This is the case, for example, of the claim that legal recognition of trans women per se threatens safe spaces, which appears to draw on stigma about predatory determinism.

Statistical evidence or analysis does not support the contention that legal recognition of trans girls represents a blanket threat to development through sports, a notion that circularly seeks to rely upon but also to justify the harmful and offensive contention that trans girls are not girls. The idea that legal recognition of the existence of trans women creates a threat of erasure of the concerns of cis women disregards the duty of the State to consider all relevant angles of intersectional analysis, including gender identity, in the formulation of policy." 31

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²⁷ UN IESOGI (2021) *The law of inclusion*. https://undocs.org/A/HRC/47/27

²⁸ Gottschalk, L. (2009) 'Transgendering women's space: A feminist analysis of perspectives from Australian women's services'. *Women's Studies International Forum*, 32(3): 167-178

²⁹ Dunne, P. (2017) '(Trans)forming single gender services and communal accommodations'. *Social and Legal Studies*, 26(5).

³⁰ Para. 28, Schedule 3 of Equality Act 2010 - https://www.legislation.gov.uk/ukpga/2010/15/schedule/3

³¹ UN IESOGI (2021) The law of inclusion. https://undocs.org/A/HRC/47/27

In considering potential concerns that trans-inclusion will result in the increased risks of abuse to women, the Welsh Government has not identified any evidence supporting the claim that trans women are more likely than non-trans women to sexually assault other women in women-only spaces. There is a lack of evidence (legal, medical or otherwise) to support this 'deviant' or predatory characterisation of trans women³². There may be additional concerns that predatory men posing as trans women may seek to gain access to women only spaces and services for malicious reasons. The Welsh Government has not identified any evidence supporting a link between women-only spaces being inclusive of transgender women, and cismen falsely claiming a trans identity to access these spaces and commit sexual violence.

Additionally, we have assessed that the LGBTQ+ Action Plan may impact matters concerning freedoms of expression on the grounds of belief and faith. However, while the right to hold a belief is absolute, the right to manifest a religious or philosophical belief is a qualified one. The plan's interference with the latter may be necessary in a democratic society in the interest of public safety, health or morals, or protecting the rights and freedoms of others. For example:

Freedom of Expression and 'Gender Critical' beliefs

A 2021 tribunal in London ruled that the claimant's gender critical beliefs amount to a philosophical belief within the meaning of the Equality Act 2010 (Forstater v CDG Europe UKEAT/0105/20/JOJ). There is concern that the judgement will leave marginalised groups (particularly trans people) more vulnerable to discrimination and harassment. The appeal tribunal was very clear in stating that whilst the claimant was afforded protection from discrimination in respect of her protected characteristic related to her belief, she will nonetheless remain subject to the prohibitions on discrimination and harassment that apply to everyone else. The ruling makes clear:

- o that the decision does not mean that trans people are subject to lesser rights
- does not mean that people with gender critical views are free to misgender or discriminate against trans people.

The Welsh Government's position is clear – support for trans people and publishing an LGBTQ+ Action Plan will not result in the erosion of the rights of any particular group, rather it forms part of our approach to strengthen equality and human rights protections for everyone.

 Freedom of Religious practices in light of a ban on conversion therapy and mandatory Relationships and Sexuality Education in schools

³² Eckes, S. (2017) 'The restroom and locker room wars: Where to pee or not to pee'. *Journal of LGBT Youth*, 14(3): 247-265.

A proposal within the plan to ban conversion therapy practices may impact on religious freedoms and place faith leaders at risk of prosecution. However, the Welsh Government's position is clear - any attempts to try to change or alter a person's sexual orientation or gender identity through conversion practices are wrong and wholly unacceptable. These practices can inflict severe pain and suffering on LGBTQ+ people, often resulting in long-lasting physical and psychological trauma. We want every LGBTQ+ person in Wales to feel able and safe to authentically and openly as themselves. Therefore, the action plan seeks to use all available powers to ban conversion therapy (taking account of and working with similar policy measures across the devolved nations) to protect LGBTQ+ people and preventing future harm, abuse and trauma being inflicted upon them.

The LGBTQ+ Action Plan may also face challenges in respect of including our continuing commitment to establish LGBTQ+ inclusive Relationships and Sexuality Education in the new curriculum. The Welsh Government remains committed to ensuring every learner has the right to enjoy full access to the new curriculum. The Welsh Government has already carried out significant consultation and impact assessment on this policy proposal in the context of religious freedoms and faith. We continue to work with a range of LGBTQ+ and faith community stakeholders to coproduce new Codes of Practice for 'Relationships and Sexuality Education' and 'Religion, Values and Ethics'.

1.5 COSTS AND SAVINGS

The actions within the plan have been costed by the relevant Welsh Government department responsible for each action and will be funded through the usual course of business. The focus of the plan is about addressing inequalities, allowing people being able to live as full lives as possible – to be healthy, to be happy and to be safe.

1.6 MECHANISMS

No legislation is currently proposed to implement the Action Plan.

SECTION 8. CONCLUSION

HOW HAVE PEOPLE MOST LIKELY TO BE AFFECTED BY THE PROPOSAL BEEN INVOLVED IN DEVELOPING IT?

The LGBTQ+ Action Plan is our first plan to focus on responding to the specific needs, diversity and vulnerabilities of our LGBTQ+ communities. For the first time, we will bring together our existing commitments to our LGBTQ+ people and will focus on achieving our ambition to creating the most LGBTQ+ inclusive country in Europe, tackling existing inequalities and challenging LGBTQ+ discrimination in the future.

The Welsh Government commissioned Stonewall Cymru in summer 2020 to carry out initial engagement with stakeholders to explore what important themes could be included in any new LGBTQ+ Action Plan for Wales. Stonewall Cymru captured LGBTQ+ people's lived experiences via a survey (over 600 respondents) and a series of virtual focus groups. Some of the key messages from this engagement focused on tackling LGBTQ+ discrimination, improving safety and addressing health inequalities, particularly the health of trans people.

In November 2020, the Welsh Government established an LGBTQ+ External Reference Group to provide advice and guidance to the Welsh Government supporting the work of the LGBTQ+ policy team. In January 2021, a smaller Independent LGBTQ+ Expert Panel was also established to build on Stonewall Cymru's initial stakeholder engagement and provide strategic advice on advancing LGBTQ+ equality in Wales.

The Welsh Government also commissioned Stonewall Cymru to carry out further stakeholder engagement sessions to support the Independent Expert Panel's consider the intersectional experiences of LGBTQ+ people. The arrangements included virtual roundtable focus groups (representing LGBTQ+ young people, older people, disabled people and people from Black, Asian and minority ethnic communities) and some additional discussions with other organisations including the Wales TUC, WEN Wales and LGBT Helpline Cymru.

The Panel issued 61 recommendations and presented their report to the then Deputy Minister and Chief Whip at the end of March 2021. The report included a set of overarching recommendations focusing on the incorporation of human rights into domestic law, strategic coordination and integration of plans, and training, awareness-raising and capacity building. The report also issued thematic recommendations for a broad range of policy areas, including recognition of trans and non-binary people, safety, home and communities, health and social care, education and lifelong learning, workplace and supporting the COVID-19 response. These recommendations formed the basis of the draft Action Plan.

The consultation on the draft Action Plan from July to October 2021 has further informed development and has assisted towards fulfilment of our Public Sector Equality Duty³³ (section 149 of the Equality Act 2010). This work will maximise the contribution to our well-being objectives and seven well-being goals through trying to tackle discrimination, advancing equality of opportunity and fostering good relations.

WHAT ARE THE MOST SIGNIFICANT IMPACTS, POSITIVE AND NEGATIVE?

Many people with protected characteristics under the Equality Act 2010 will be positively impacted by this Action Plan, especially those with the protected characteristics of sexual orientation and gender reassignment. A full equality Impact Assessment has been carried out as part of this Integrated Impact Assessment and has not found any evidence for negative impacts on those with other protected characteristics

CHILDREN AND THEIR REPRESENTATIVES

The LGBTQ+ Action Plan sets out a series of proposals intended to support the well-being of LGBTQ+ children and young people and the rights guaranteed to them by the UNCRC. For example:

- Developing guidance to support trans learners (Articles 2, 8 and 29)
- Improving access to safe spaces and inclusive youth support services (Articles 13 and 15)
- Improving children and young people's access to gender identity support (Articles 8 and 24);
 and,
- LGBTQ+ inclusive Relationships and Sexuality Education in the new curriculum (Article 29).

The initial development and drafting of the plan has also taken account of Article 12 of the UNCRC and has supported children and young people's involvement in decision-making through virtual roundtable discussion groups. A number of LGBTQ+ youth organisations were also represented in our stakeholder engagement arrangements. There were further opportunities for children and young people to have their voices heard during the formal consultation stage of the plan. Feedback from the consultation phase has been used in the development of a Children's Rights Impact Assessment.

WELSH SPEAKERS AND WELSH LANGUAGE SPECIALIST GROUPS

The consultation was available in a number of languages, including Welsh, English, BSL and other community languages. The consultation aimed to specifically seek the views of Welsh speakers

³³ EHRC (2015) *Public Sector Equality Duty in Wales* https://www.equalityhumanrights.com/en/advice-and-guidance/public-sector-equality-duty-wales

and Welsh language specialist groups, and we worked with partner organisations to invite them to consult with us. Their input fed into specific actions and goals around Welsh Language in the Plan, though goals and actions across the many different policy areas, will impact Welsh speakers.

IN LIGHT OF THE IMPACTS IDENTIFIED, HOW WILL THE PROPOSAL:

MAXIMISE CONTRIBUTION TO OUR WELL-BEING OBJECTIVES AND THE SEVEN WELL-BEING GOALS

Creating a more equal Wales, where everyone has the opportunity to participate, reach their full potential and is able to contribute fully to the economy, will enable Wales to be more prosperous and innovative. The development of the LGBTQ+ Action Plan has obvious links to this goal. The plan has been developed in line with the sustainable development principle and the 'five ways of working' in section 5 of the Well-being of Future Generations Act 2015. Most importantly through involvement and collaboration; lived experience of LGBTQ+ people is central to the plan's content.

AVOID, REDUCE OR MITIGATE ANY NEGATIVE IMPACTS?

No direct negative impacts have been anticipated as a result of publishing an LGBTQ+ Action Plan. The Plan is designed to respect, protect and fulfil LGBTQ+ rights guaranteed to them by a range of international human rights treaties. However, it is likely the LGBTQ+ Action Plan may be subject to a number of misconceptions and challenges relating to:

- o a perceived roll-back or trade-off of protections for women and girls,
- o a potential interference of religious freedoms and the right to manifest a belief.

While the plan focuses on the specific needs and vulnerabilities of LGBTQ+ people, it forms part of wider approach to advance equality and strengthen human rights protections for everyone. As such, it should be read alongside our Strategic Equality Plan, Anti-racist Wales Action Plan, Framework for Action on Disability, and Gender Equality Plan.

HOW WILL THE IMPACT OF THE PROPOSAL BE MONITORED AND EVALUATED AS IT PROGRESSES AND WHEN IT CONCLUDES

The LGBTQ+ Action Plan is in intended to be a 'living' document. This will feed into the policy decisions and the implementation of its actions will be owned by different policy departments across Welsh Government. Officials working in those policy areas will provide regular updates to a centralised Equalities Team and an annual progress update will be provided to Senedd. There will also be a role for the proposed Equalities Data Unit which is expected to improve the collection and use of data and evidence. Many of the actions in the Plan also seek to improve data and

evidence to determine whether policies are achieving the desired outcomes. Co-construction has been an important principle for the development of the Plan and including the lived experiences of people will be equally as important during its implementation.

A. CHILDREN'S RIGHTS IMPACT ASSESSMENT

<u>All</u> completed Children's Rights Impact Assessments must be sent to the CRIA@gov.wales mailbox

POLICY OBJECTIVES

Publication of an LGBTQ+ Action Plan for Wales

GATHERING EVIDENCE AND ENGAGING WITH CHILDREN AND YOUNG PEOPLE

The draft LGBTQ+ Action Plan sets out a series of proposals intended to support the well-being of LGBTQ+ children and young people and the rights guaranteed to them by the UNCRC. For example:

UNCRC Articles or Optional Protocol	Enhances (X)	Challenges (X)	Explanation
Improving access to safe spaces and inclusive youth support services (Articles 13 and 15)	X		In relation to workplace and Actions in the Plan refer directly to LGBTQ+ young people being able to access youth work services that are relevant to them, and they have safe spaces to go to. This aims to improve the LGBTQ+ youth work sector. More specifically, the Plan suggests engaging with the youth work sector to improve access to Youth Work provision and safe spaces for young people with differing backgrounds and needs, including LGBTQ+ young people, and increased diversity within the youth work workforce.

Developing guidance to support trans learners (Articles 2, 8 and 29)	Х	schools wi	for local authorities and Il enable them to meet the needs of trans children and ple.
Improving children and young people's access to gender identity support (Articles 8 and 24)	X	services the gender dy services the recommen	the provision of support for lat support children with sphoria and delivering lat such a review lads will help trans and verse children.
LGBTQ+ inclusive Relationships and Sexuality Education in the new curriculum (Article 29)	х	children ar LGBTQ+ po reduce pre	clusive RSE ensures that all re able to understand eople and relationships and ejudice and discrimination BTQ+ children.

The initial development and drafting of the plan has also taken account of Article 12 of the UNCRC and has supported children and young people's involvement in decision-making through virtual roundtable discussion groups. Several LGBTQ+ youth organisations were also represented in our stakeholder engagement arrangements. There were further opportunities for children and young people to have their voices heard during the formal consultation stage of the plan and a children and young people's version of the Action Plan was produced to aid understanding and improve accessibility to the consultation.

ANALYSING THE EVIDENCE AND ASSESSING THE IMPACT

The LGBTQ+ Action Plan sets out a series of proposals intended to support the well-being of LGBTQ+ children and young people and the rights guaranteed to them by the UNCRC. For example:

- Developing guidance to support trans learners (Articles 2, 8 and 29)
- Improving access to safe spaces and inclusive youth support services (Articles 13 and 15)
- Improving children and young people's access to gender identity support (Articles 8 and 24);
 and,
- LGBTQ+ inclusive Relationships and Sexuality Education in the new curriculum (Article 29).

The initial development and drafting of the plan have also taken account of Article 12 of the UNCRC and has supported children and young people's involvement in decision-making through virtual roundtable discussion groups. Several LGBTQ+ youth organisations were also represented in our stakeholder engagement arrangements.

Self-harm

Stonewall Cymru's School report suggests that 61% of those Welsh LGB students who did not identify as trans have self-harmed, this figure rises to 77% for trans students (2017³⁴). Moreover, 25% of Welsh LGB students report attempting to take their own life. For trans students this number increases to 41%.

Data from the Millennium Cohort Study demonstrates large inequalities in mental health between heterosexual and LGBTQ+ 17-year-olds (Patalay and Fitzsimmons, 2021³⁵). For example, there was a 55.8% prevalence of self-harm over the course of year for sexual minorities compared to 20.5% of heterosexual young people. Moreover, there was a 21.7% lifetime prevalence of suicide attempts amongst sexual minorities, compared to 5.8% of those who identify as heterosexuals.

Longitudinal research using data from the Avon Longitudinal Study of Parents and Children (ALSPAC) (Oginni et al., 2018³⁶), found that young people who identified with a sexual minority group were three times more likely to self-harm or report suicidal ideation in the last year compared to their heterosexual counterparts. Data was collected at age 16, where 17.7% of heterosexual young people reported self-harm or suicidal ideation, compared to 38.9% of sexual minorities. Similar findings were reported for data collected at age 20, with 16.3% of heterosexual reporting self-harm and suicidal ideation, compared to 36.7% of sexual minorities. The authors note additionally that factors such as low self-esteem and depressive symptomology have mediating effects on this increased risk.

Using data from the Adult Psychiatric morbidity survey (McManus et al., 2014³⁷) for comparison amongst the general young people population, 25.7% of women and 9.7% of men aged 16-24

³⁴ School Report Cymru - proof 5.cdr (stonewallcymru.org.uk)

³⁵ Psychological distress, self-harm and attempted suicide in UK 17-year olds: prevalence and sociodemographic inequalities | The British Journal of Psychiatry | Cambridge Core

³⁶ Mediators of increased self-harm and suicidal ideation in sexual minority youth: a longitudinal study | Psychological Medicine | Cambridge Core

³⁷ mental_health_and_wellbeing_in_england_full_report.pdf (digital.nhs.uk)

years reported having ever self-harmed. Amongst this age group, around 19% of men and 34% if women reporting having ever had suicidal thoughts.

Feeling safe

A British survey by Just Like Us indicated that 10% of young people (aged 11-18) who identified as bisexual experienced unwanted sexual touching in the 12 months prior to the survey (12% for bisexual girls and 5% for both pansexual people and lesbians) (Milsom, 2021). At 5%, gay boys were the least likely to have experienced unwanted sexual touching. Data from the Millennium Cohort Study LGBTQ+ 14-year-olds report higher likelihood of experiencing verbal, physical and sexual assault compared to their heterosexual counterparts (Amos et al., 2020³⁸). Moreover, they are more likely to be bullied by siblings, peers and online.

Research on a British sample by Ipsos MORI (2020³⁹) indicated that when asked how much if any discrimination LGBTQ+ experienced today, 26% responded 'not very much/none at all' and 60% responded 'a great deal/fair amount'.

Findings from a British survey by Just Like Us (Milsom, 2021) report that in the year prior to the survey being undertaken, only 58% of LGBT+ students described feeling safe daily at school – comparatively the figure is higher at 73% for non-LGBT+ students. 43% of LGBT+ students report being bullied in the year prior to responding to the survey, compared to 21% of non-LGBT students.

Stonewall's University report (2018⁴⁰) highlights unique issues for trans and non-binary students. For example, 24% of non-binary and 16% of trans students felt unable to wear clothes which expressed their gender at university. Furthermore, 17% of trans university students were not able to use the toilet they would prefer. 14% of British LGBT university students reported negative experiences with university staff because of their gender or sexual identity. This figure is higher for trans students with 36% reporting these negative experiences. Additionally, 24% of ethnic minority LGBT students, and 22% of disabled LGBT students report these negative experiences with university staff.

³⁸ CLS | LGB teens at greater risk of poor mental health, new study finds (ucl.ac.uk)

³⁹ Sexual orientation and attitudes to LGBTQ+ in Britain (ipsos.com)

⁴⁰ lgbt_in_britain_universities_report.pdf (stonewall.org.uk)

Stonewall Cymru's School report (2017) also stated that 62% of Welsh LGBT students did not have a teacher at school they felt comfortable discussing their LGBT identity with. For trans students, Stonewall Cymru stated that 53% were not able to use their preferred toilet, and 42% were 'not able to be known by their preferred name at school' (p. 19).

The Stonewall Cymru School report (2017) stated that of Welsh students aged 11-19 years, 54% of LGBT students and 73% trans students experienced bulling at school about their sexual identity or gender. Moreover, the report indicated that 60% of respondents 'frequently' or 'often' heard homophobic language, 49% reported having heard biphobic language and 51% reported transphobic language. Additionally, of the LGBT pupils who report having been bullied,

47% say they have never told anyone about it and only 25% say that teachers intervened when the bulling was occurring in their presence

Online abuse

Stonewall Cymru Hate and Discrimination report (2017) finds that 11% of their Welsh sample reported experiencing online abuse within the month prior to the survey been undertaken. This figure rises to 24% for trans people who experienced transphobic abuse.

The Stonewall Cymru School (2017) report finds that 46% of Welsh LGBT adolescents (aged 11-19) have experienced abuse related to their LGBT identity online, with 97% reporting seeing homophobic, biphobic and transphobic abuse on the internet. The report also finds that 60% of adolescents did not believe that online platforms would act on homophobia, biphobia and transphobia when reported to them.

A British survey by Just Like Us noted differences between sexual identities and experiences of online abuse (Milsom, 2021). The survey found that in the year prior to the survey, 26% of bisexual and 31% of pansexual young people experienced 'cyber bullying'. For young lesbians this percentage was lower at 21% and lower again for gay boys at 14%.

Mental health

Research indicates that LGBTQ+ youth are at an acute risk of experiencing poor mental health. For example, the Mental Health of Children and Young People in England survey highlights the

association between LGB young people and mental health (NHS Digital, 2017⁴¹). The survey finds that 34.9% of LGBQ+ young people had a mental disorder, compared to 13.2% of heterosexual young people. See also Jadva et al. (2021⁴²).

Data from the Millennium Cohort Study revealed that age 14 years, poor mental health including depressive symptoms and self-harm were all more prominent amongst LGB people than their non-LGB counterparts (Amos et al., 2020⁴³). Moreover, LGB 14-year-olds appear to have lower self-esteem as well as being three times as likely to report being unsatisfied with life.

Similar findings are reflected in the Stonewall's Trans report (2018⁴⁴) on a British sample which found that when visiting general healthcare services in the year prior to completing the survey, 41% of trans people thought healthcare staff failed to have adequate knowledge of trans-specific health needs. 11% of trans people report sourcing medical treatments for their transition abroad or online from other countries. Receiving gender-confirming medical treatment has been shown to improve the mental health of trans people and therefore is a crucial healthcare service for this population. Dhejne et al. (2016⁴⁵) find that whilst trans populations attending health care services did present with higher levels of mental illness (comparatively to the general population), these levels improved following the receipt of gender-confirmation medical intervention. Often measures of mental illness would return to normative values after receipt of gender-confirming medical intervention.

The Student Health Research Network (SHRN) asked Welsh students in years 7-11 whether they identified as a 'male', 'female' or whether 'neither word describes me' (Page et al., 2021⁴⁶). 1% of their sample (1,191 people) indicated that they did not identify with either a male or female. Of this group, 54% presented mental health symptoms within a 'very high' range. This is compared to 21% of females and 15% of males. It is also important to note that research has suggested that

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⁴¹ Mental Health of Children and Young People in England 2017 [PAS] - GOV.UK (www.gov.uk)

⁴² Predictors of self-harm and suicide in LGBT youth: The role of gender, socio-economic status, bullying and school experience - PubMed (nih.gov)

⁴³ CLS | LGB teens at greater risk of poor mental health, new study finds (ucl.ac.uk)

⁴⁴ lgbt_in_britain_-_trans_report_final.pdf (stonewall.org.uk).

⁴⁵ Mental health and gender dysphoria: A review of the literature - PubMed (nih.gov)

⁴⁶ SHRN-NR-FINAL-23_03_21-en-AMENDED06.08.21.pdf

non-binary transgender youth experience an increased risk of anxiety, depression and other mental health concerns compared to binary transgender youth (Thorne et al., 2018⁴⁷). Such research highlights the diverse experience of LGBTQ+ identities, and the importance of distinguishing these unique experiences.

Education

Research undertaken in Stonewalls Cymru school report (2017) states that 58% of Welsh LGBT students were never educated on LGBT matters, 84% had never been educated on bisexuality and 87% had never been educated on transgender and other genders. There has, however, been recent changes to the relationships and sexuality education curriculum for Wales emphasises the importance of including LGBTQ+ related topics (Welsh Government, 2022⁴⁸).

LGBTQ+ students have unique needs and require specialist health and sex education. The SHRN (2021) demonstrated that students in Wales in years 7-11 who did not identify as either male or female were more likely to report partaking in sexual activities than those who identified as male or female. For example, 31% reported sending a sexually explicit photo of themselves compared only 9% of males and 10% of females. Moreover, of those in year 11, 53% of students who did not identify as either male or female reported having had sexual intercourse, compared to only 25% of both male and females. 62% of students who did not identify as either male or female reported having had sexual intercourse for the first time aged 13 years or younger, compared to 24% of males and 15% of females.

Similarly, Stonewall's University report (2018⁴⁹) also reveals that 60% of trans university students report negative experiences with peers at their university because of their LGBT identity compared to 22% of LGB students who are not trans. Additionally, the report highlights that LGBT ethnic minority and LGBT religious students are at an increased likelihood of feeling excluded by other students because of their gender or sexual identity with 37% of both groups reporting this.

⁴⁷ A comparison of mental health symptomatology and levels of social support in young treatment seeking transgender individuals who identify as binary and non-binary - PubMed (nih.gov)

⁴⁸ curriculum-for-wales-relationships-sexuality-education-code.pdf (gov.wales)

⁴⁹ lgbt_in_britain_universities_report.pdf (stonewall.org.uk)

Similarly, 36% of disabled LGBT students. This can be compared to 28% of overall LGBT students reporting feeling excluded by other students. See also SHRN (2021)⁵⁰.

Whilst there is limited research on intersex children's experience of education, research from Australia indicates that intersex children report negative experiences related to their identity at school. Jones (2016) reports that when their sample (aged 18 – 87 years) was asked to reflect on their overall experience of school and education, 34% of respondents reported their experience as negative. Moreover, 18% of intersex students did not attend secondary school, compared to 2% of the general Australian population.

Health / Education

With regards to other health education areas, those who did not identify as male, or female were disproportionately more likely to take up other risky health behaviours than males or females. The SHRN identified that 27% of those who did not identify as male or female reported currently smoking tobacco at least weekly, compared to 4% of males and 3% of females. Similar patterns were revealed with students who drank alcohol at least weekly (34% of those who did not identify as male or female, 9% of males and 6% of females) and for students who admitted to using drugs (37% of those who did not identify as male or female, 16% of males and 13% of females).

Research using data from the Millennium Cohort study on 14-year-olds indicated that LGB people were no more likely to engage in some risky behaviours compared to heterosexual students. For example, LGB 14-year-olds were more likely to report having drunk alcohol, smoked and used cannabis, however, they were no more likely to report drinking alcohol and using cannabis regularly compared to heterosexual students. Unlike SHRN research looking at gender, when looking at sexual identity, Amos et al. report indicated that LGB 14-year-olds were no more likely to have had sex, or engaged in risky sexual behaviours compared to heterosexual counterparts.

The above evidence both highlights the need for an LGBTQ+ Action Plan and shows the ways in which the Action Plan is intended to positively impact on the lives of LGBTQ+ children and young people.

MINISTERIAL ADVICE AND DECISION

 $^{^{50}}$ The SHRN report (2021) also highlighted that those in year 7 – 11 who did not identify as male or female were more likely to have experienced bullying (61%) than male (30%) and female (35%) students. Similarly, those who did not identify as male or female were more likely to report bullying (33%) compared to male (18%) and female (11%).

Ministerial advice will include the impacts on Children's Rights, around the enhancements to the rights of LGBTQ+ children not only in actions that benefit LGBTQ+ people of all ages, but also in specific actions aimed at the rights of children such as

- Review the Gender Identity Development pathway for young people in Wales
- Provide national trans guidance for schools and local authorities
- Design and implement a whole school approach that is fully LGBTQ+ inclusive+
- Support LGBTQ+ young people and tackle homophobic, biphobic and transphobic bullying
- Support the LGBTQ+ youth work sector

COMMUNICATING WITH CHILDREN AND YOUNG PEOPLE

An easy-read version as well as a children's version of the plan was provided for the consultation.

Similar versions of the final plan will be commissioned and published following the publication of the main Action Plan

MONITORING AND REVIEW

Progress of the LGBTQ+ Action Plan will be reported annually, and this report will include updates on those actions that directly affect children and young people.

WELSH LANGUAGE IMPACT ASSESSMENT

Cymraeg 2050 is our national strategy for increasing the number of Welsh speakers to a million by 2050.

The Welsh Government is fully committed to the new strategy, with the target of a million speakers included in its Programme for Government. A thriving Welsh language is also included in one of the 7 well-being goals in the Well-being of Future Generations (Wales) Act 2015.

We also have a statutory obligation to fully consider the effects of our work on the Welsh Language. This means that any Welsh Government policy should consider how our policies affect the language and those who speak it.

The Welsh language is one of the treasures of Wales. It is part of what defines us as people and as a nation. Our ambition as Welsh Government is to see the number of people able to enjoy speaking and using Welsh reach a million by 2050. At the beginning of the sixth Senedd, the Welsh Government published a five-year work programme for delivering "Cymraeg 2050: A million Welsh speakers" during 2021-26 (Welsh Government 2022a). Therefore, we suggest reading this LGBTQ+ Action Plan in combination with the Welsh Language strategy and plans, considering the role of Welsh language across the activities outlined below. The Welsh language, and the responsibility for acting to protect it, belongs to us all. Everyone has their role, regardless of where they live or how much Welsh language they can speak. We hope to see more organisations and public leaders taking responsibility for the language.

Example of actions:

Design and implement a whole	Support schools with mandatory	Schools and educational settings
school approach that	requirements of the	have the tools that
is fully LGBTQ+	statutory RSE Code	they need to
inclusive	and guidance which is	successfully
	LGBTQ+ inclusive.	implement the RSE
		Code and Guidance
	Ensure education	in all educational
	supporting resources	settings, in both
	contain materials	Welsh and English.
	that are LGBTQ+	
	inclusive, including in	Schools and
	Welsh Language.	educational settings
		have access to a
	Provide professional	range of LGBTQ+
	learning	inclusive literature
	opportunities for all	and resources in all
	staff in schools and	educational settings,

educational settings to understand the core elements of providing LGBTQ+ inclusive education. in both Welsh and English.

Support schools in Wales, along with Local Authorities, to comply with their Public Sector Equality Duty obligations, in particular the requirement to publish Strategic Equality Plans (SEP) and equality objectives.

LGBTQ+ Welsh speaking young people see themselves reflected in their school environment, education, and Welsh literature.

Ensure that LGBTQ+ Welsh speakers have access to Welsh medium support services. Services provided by public services and funded partners are available in both Welsh and English, in line with the Welsh Language Standards and Welsh Government policy for grant recipients and funded services.

LGBTQ+ Welsh speakers will be able to access services in the language of their choice.

Celebrate and improve the representation of LGBTQ+ communities in the heritage and culture of Wales.

Work with partner organisations to support LGBTQ+ communities to collate and donate collections to local archives and museums.

LGBTQ+ culture and history are better represented in the cultural sector.

Establish collaborations with national and local collections to support Pride activity across Wales, including during Pride month.

The needs of Welsh language speakers are met in the representation of LGBTQ+ culture.

Use national and local collections in Wales to celebrate and share LGBTQ+ stories and histories, providing funding where appropriate.

Improve LGBTQ+
representation in the
Culture sector in Wales at
all levels, including at
Board, workforce, and
volunteers' levels.
Work in collaboration with
LGBTQ+ organisations and
key partners to ensure
the needs of Welsh
language speakers
are met in the
representation of
LGBTQ+ culture.