



Llywodraeth Cymru
Welsh Government

Our ref: ATISN 17262

Date: 11 April 2023

Dear _____,

FOI Request – ATISN 17262 – RB – LGBTQ+ action plan – 10-03-2023

Thank you for your request which I received on 10 March 2023. You asked for:

1. Please provide all minutes from all meetings relating to the LGBTQ+ Action Plan.
2. How much did it cost to produce the LGBTQ+ Action Plan? Please provide cost as a breakdown.
3. How much will it cost to implement the LGBTQ+ Action Plan?
4. Please provide all drafts of the LGBTQ+ Action Plan.
5. Please provide documentation on how the Welsh Government will evaluate and monitor the success of the LGBTQ+ Action Plan.

Our response

From our preliminary assessment we estimate that it will cost more than the appropriate limit set out in the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004 to comply with your requests for

- (1) copies of minutes for all meetings related to the LGBTQ+ Action Plan and for
- (4) copies of all draft versions of the LGBTQ+ Action Plan.

The appropriate limit specified for central government is £600. This represents the estimated cost of it taking over 24 hours of time to determine whether we hold the information and to thereafter locate, retrieve and extract it.

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

- a. In order to provide the information that you have requested, it would require several weeks of work to gather all the correspondence concerning meetings, internal and external, with stakeholders, officials and ministers.
- b. This is due to the fact that the draft LGBTQ+ Action Plan gathered over 50 actions across several departments and policy areas of Welsh Government. Within the LGBTQ+ policy area, most daily and weekly meetings, internal or external ones, concern actions described in the Plan, since 2021. With an average of 15 to 20 meetings per week and dozens of emails to arrange them, multiplied for each official working in the LGBTQ+ Policy Area and/or leading on each action, over c.2 years, it would make this request excessively laborious and costly, and effectively more than the limit specified for central government.
- c. An initial search had found 1,575 items were found in one of the official's email folders since March 2022. At least 3 officials have been working on this since then, so we can reasonably estimate at least double those figures over the past five months. This calculation would have to be extended to the whole time period cover by LGBTQ+ Action Plan-related activities since the start of the process.
- d. A second review found that the search within Outlook would likely reach an estimated figure of 3,000 outlook items to search.
- e. An initial search was also conducted within our electronic filing system of the exact phrase 'LGBTQ+ Action Plan' which uncovered 3,000+ documents to be reviewed to check for relevance to the request.
- f. An enhanced search function was utilised within our electronic filing system which uncovered 899 documents to be reviewed and checked for relevance to the request.
- g. This brings the estimated total time to undertake the work for this first part of the FOI to over **194 hours** (3,899 documents x 3 minutes). Consequently, I have decided not to comply with this part of your have request.

You may wish to refine your request by narrowing its scope by being more specific about what information you particularly wish to obtain, including any dates or period of time relevant to the information required. If you do refine your request in this way, this will be treated as a new request.

Thus, our responses to your requests are as follows.

- 1) As set out above, we believe complying with this request would exceed the appropriate limit and consequentially we are not taking this request forward.
- 2) As far as work on the LGBTQ+ Action Plan can be separated out from other work, we have been able to determine the following costs:
 - a. The Independent LGBTQ+ Expert Panel was convened in January 2021 to develop recommendations for a draft Welsh Government LGBTQ+ Action Plan.

- b. A report was submitted to Welsh Government in March 2021; worked formally commenced on the LGBTQ+ Action Plan draft afterwards (financial year 2021/22).
 - c. Therefore, we have provided costs broken down into staff costs and capital expenditure for the past two financial years. However, please **note** that the resources and costs for staff covered the whole LGBTQ+ Policy Area, of which the LGBTQ+ Action Plan is just a portion.
 - i. 2021-22 Staff Costs £101,199; Capital expenditure £185,000
 - ii. 2022-23 Staff Costs £156,936; Capital expenditure £26,105
 - d. In total, we estimate that the costs for the overall LGBTQ+ Policy Area, and therefore the maximum costs for producing the final version of the LGBTQ+ Action Plan, would be around £652,281.
- 3) While you will understand that it is only possible to provide an estimate of costs for the implementation of the Plan, the forecasted budget for the overall LGBTQ+ Policy area for 2023-24 is up to c.£656,000; the total amount for staffing costs is £229,844. We predict similar sums for 2024-25 and 2025-26. It should be noted that these figures are for the entirety of the work of the LGBTQ+ Policy area, of which the LGBTQ+ Action Plan is just a portion and a framework. The actual spends on the LGBTQ+ Action Plan as a proportion of this total will be assessable at the end of each financial year.
- 4) As set out above, we believe complying with this request would exceed the appropriate limit and consequentially we are not taking this request forward. Having said that there were two substantive drafts of the LGBTQ+ Plan. The Draft Plan for consultation was published for consultation at [LGBTQ+ Action Plan | GOV.WALES](#) and the Published Plan at [LGBTQ+ Action Plan for Wales | GOV.WALES](#).
- 5) Please find attached at Annex A the paper on “*Evaluability Assessment*” of the LGBTQ+ Action Plan for Wales.

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: 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.

Yours sincerely

Annex A - Evaluability Assessment

From **CAB-Paper CAB(22-23)41** – Publication of the LGBTQ+ Action Plan for Wales.

The LGBTQ+ Policy team has been working closely with the Equality, Race and Disability Evidence Units to discuss the future evaluability of the LGBTQ+ Action. Together they have decided to joint-commission initial work to outline how the LGBTQ+ Action Plan can best be evaluated in the future. Measuring the Action Plan's impact on LGBTQ+ communities in Wales will be crucial in evaluating its success and efficacy.

The work needed to assess the future evaluability of the Action Plan will be split into two parts, but to be completed under one contract due to commence in April 2023.

The first part is the development of theories of change. A theory of change articulates, usually diagrammatically, how an initial activity is intended to lead to outputs, outcomes, and eventually impact for the intended beneficiary, and upon which assumptions this causal chain lies. The work of the supplier will be to develop the table of Actions in the Action Plan into more detailed theories of change (e.g., for each of the policy areas covered by the Action Plan). Accompanying these it is intended that there will be an overarching theory of change for the whole Action Plan to articulate the theory of the whole Plan. These theories of change will be created through consultation with Welsh Government officials, relevant stakeholder organisations, and importantly with LGBTQ+ people ('experts through experience') who will help us understand what 'success' means in the context of the Action Plan, which will in turn inform the overall evaluation of the Action Plan.

The second part of the work will be to undertake an evaluability assessment. An important part of this will be to identify which data will be needed to assess whether the Action Plan is achieving its desired effects – the desired effects themselves being informed through the development of the theories of change. A data mapping exercise will take place to identify whether the necessary data is currently available through existing sources or whether new sources of data will need to be created to evaluate the impact of the Action Plan. The evaluability assessment will also outline the different options for evaluation of the Action Plan (e.g., methodology and baseline data) along with an appraisal of how effectively each option will answer the identified objectives for evaluation, how feasible each option is, as well as its cost-effectiveness.

The above activities will culminate in a Government Social Research report to be produced by the Welsh Government and will allow officials to understand how the Action Plan can be effectively evaluated, providing a blueprint for final evaluations.