



Llywodraeth Cymru
Welsh Government

Our ref: ATISN 25141 & 25131

Date: 14 October 2025

Dear ,

ATISN - 25141 & 25131- Information requested

Thank you for your request which I received on 08/09/2025. You asked for:

(ATISN 25141):

Final versions only (no drafts) from 16 April 2025 to present of:

1. Ministerial submissions, DG/Director sign-off notes, and staff guidance that define “sex” for Equality Act purposes or instruct inspection/HR/safeguarding practice (HIW, CIW, Education).
2. Any checklists/inspection criteria issued to HIW/CIW/Estyn that touch single-sex services/facilities, data accuracy for “sex”, or compelled-belief risks.
3. Change logs or “what changed/why” memos for the Strategic Equality & Human Rights Plan 2025–2029 and any interim instructions issued pending the EQIA.
4. Current EDI training packs or mandatory modules used by Welsh Government/HIW/CIW that reference “sex”, “gender reassignment”, “gender identity”, pronouns, or compelled belief.
5. Current third-party arrangements (contracts/MoUs) since 1 Jan 2024 with Stonewall/Stonewall Cymru or other EDI advocacy providers, including deliverables (final reports/tools only).

(ATISN 25131):

Safeguarding

- The current measures (interim guidance, triage criteria, escalation routes) that ensure lawful single-sex services and protection against compelled belief in NHS Wales settings, care homes/regulated services, and schools.
- Any incident/lessons-learned summaries (anonymised) where sex misclassification or compelled-belief pressures affected patients, pupils, residents, or staff since 16 April 2025.

Immigration Eligibility and Resource Allocation Compliance

- The internal legal analysis defining the boundary between reserved immigration control and devolved eligibility decision-making (health/social care/housing interfaces).

- Any audits, spot checks, or risk assessments (16 April 2025–present) on eligibility verification and NRPF safeguarding in devolved services (including correspondence with WLGA, NHS Wales Shared Services, local authorities).
- Any identified risks or misuse (aggregated) and remedial actions taken or ordered.
- Whether the Equality Plan/EQIA explicitly integrates NRPF/eligibility as a legal risk area and, if not, the rationale.

Third-party influence

- The current list of active arrangements since 1 Jan 2024 and corresponding deliverables (final outputs only).
- Any conflict-of-interest or impartiality assessments weighing third-party advocacy influence against the Nolan Principles and legal neutrality.
- Names/titles of officials who approved ongoing reliance post-UKSC.

From a 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 answer your request. 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.

In order to provide you with the information that you have requested would require a search across a large number of Welsh Government departments including (but not limited to) HIW, CIW, Education, Health, Equality & Diversity, Human Resources & Immigration.

As an example, addressing the query with regards to point 1 on ATISN 25141 - Ministerial submissions, DG/Director sign-off notes, and staff guidance that define “sex” for Equality Act purposes or instruct inspection/HR/safeguarding practice has been calculated as taking 6 hours in relation to HIW alone. Extrapolated across the 3 areas this would be a total of 18 hours.

Individual teams have identified that in order to address each of the additional queries raised in relation to ATISN 25131 & 25141 (of which there are 13 in total) would take between 2-3 hours. This extrapolated across all queries provides an estimate of an additional 26 to 39 hours.

Consequently, we have decided not to provide the information you have requested.

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, or a specific area of Welsh Government.

If you do refine your request in this way, this will be treated as a new request. 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 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