

29 September 2026

Dear

ATISN 27444 – Reflect Cymru

Thank you for your request to Welsh Government for information under the Freedom of Information Act (2000) received on 1st September 2026, relating to Reflect Cymru.

You requested the following information:

- 1. For each financial year from 2017/18 to 2025/26, please provide the total amount of Welsh Government funding specifically allocated or notionally attributed to Reflect Cymru across Wales, where such a figure exists.*
 - 2. Please provide the recorded date/financial year in which dedicated or ring-fenced Reflect funding was incorporated into the Revenue Support Grant or another general local-government funding mechanism.*
 - 3. Please provide any guidance, correspondence or funding documentation issued to local authorities at the time of that change which explained:*
 - a. whether Reflect services were expected to continue;*
 - b. whether the transferred funding was ring-fenced;*
 - c. whether a notional Reflect allocation remained identifiable; and*
 - d. what discretion local authorities had to cease funding Reflect.*
 - 4. If a notional amount corresponding to the former Reflect funding remains identifiable within the local-government settlement, please provide the amount attributable to:*
 - a. Cardiff Council; and*
 - b. Vale of Glamorgan Council**for each financial year for which such information is held.*
- If no such notional allocation is identifiable, please confirm that this is the case.*
- 5. Please provide any information held showing which Welsh local-authority or regional areas had an operational Reflect service in each of the financial years:*
2022/23,
2023/24,
2024/25,
2025/26, and
2026/27.
 - 6. Please provide the date on which Welsh Government first became aware that Reflect Cymru Cardiff and Vale of Glamorgan had ceased, or would cease, operating.*
 - 7. Please provide copies of substantive correspondence between Welsh Government and:*
 - a. Cardiff Council;*
 - b. Vale of Glamorgan Council; and*
 - c. Barnardo's*

from 1 January 2023 onwards which directly concerns funding, continuation, recommissioning, non-renewal or cessation of Reflect Cymru Cardiff and Vale of Glamorgan.

I am not seeking routine operational correspondence or information concerning individual service users.

8. Please provide copies of any briefing, submission, ministerial advice, policy paper or assessment produced from 1 January 2023 onwards which discusses:

- a. the cessation of Reflect in Cardiff and/or the Vale of Glamorgan;*
- b. gaps in geographical availability of Reflect across Wales;*
- c. variation or inequality in access to Reflect according to local-authority area; or*
- d. the future funding or commissioning of Reflect Cymru nationally.*

9. Current Welsh Government/Social Care Wales public information has described Welsh Government as having "rolled out the Reflect project across Wales".

Please provide any recorded information from 1 January 2024 onwards which defines what Welsh Government currently means by Reflect being available or "rolled out" across Wales, particularly where one or more local-authority areas do not have an operational Reflect service.

10. Please provide any recorded assessment undertaken since 1 January 2023 of whether residents throughout all 22 Welsh local-authority areas currently have access to Reflect or an equivalent specialist service for parents following permanent removal of a child.

11. Please provide any recorded information concerning whether Welsh Government has considered:

- a. restoring ring-fenced funding for Reflect;*
- b. establishing a national commissioning arrangement;*
- c. requiring or encouraging regional commissioning of Reflect;*
- d. funding replacement provision in areas where Reflect has ceased; or*
- e. otherwise ensuring consistent geographical access across Wales.*

12. Please provide any recorded evaluation or monitoring data held centrally by Welsh Government from 2021/22 onwards concerning the outcomes or cost effectiveness of Reflect, including any data concerning recurrent care proceedings, subsequent pregnancies or children entering care.

Our Response

Welsh Government holds some of the information requested and this has been set out below.

We have concluded that some of the information requested is exempt from disclosure under the following section of the Freedom of Information Act:

- Section 40(2) – Personal Information of the Freedom of Information Act.

An explanation of our application of this exemption is set out at Annex 1 of this letter.

1. For each financial year from 2017/18 to 2025/26, please provide the total amount of Welsh Government funding specifically allocated or notionally attributed to Reflect Cymru across Wales, where such a figure exists.

2017/18 - £824,069 – allocated
 2018/19 – £790,000 – notional
 2019/20 - £790,000 – notional
 2020/21 - £790,000 – unidentifiable as with overall settlement calculation
 2021/22 - £790,000 – unidentifiable as with overall settlement calculation
 2022/23 - £790,000 – unidentifiable as with overall settlement calculation
 2023/24 - £790,000 – unidentifiable with overall settlement calculation
 2024/25 - £790,000 – unidentifiable as with overall settlement calculation
 2025/26 - £790,000 – unidentifiable as with overall settlement calculation

The 2017/18 figure is higher because in November 2017 Welsh Government agreed to increase the funding awarded to Rhondda Cynon Taf County Borough Council in delivering Reflect Project across Cwm Taf & Bridgend Region by a further £34,069 for that financial year.

In 2017/19 Newport City Council were also allocated £60,000 Welsh Government funding for national support for the establishment of Reflect projects across Wales. From 2018/19 onwards this was transferred to the Welsh Local Government Association as part of their overall topslice, Welsh Government do not hold information on the detailed breakdown of use of the topslice.

2. Please provide the recorded date/financial year in which dedicated or ring-fenced Reflect funding was incorporated into the Revenue Support Grant or another general local-government funding mechanism.

From the 2018/19 financial year and successive financial years the £790,000 Welsh Government Reflect delivery funding moved into the Revenue Support Grant. For 2018/19 and 2019/20 only this is separately identifiable as part of the transfer mechanism.

3. Please provide any guidance, correspondence or funding documentation issued to local authorities at the time of that change which explained:

- a. whether Reflect services were expected to continue;***
- b. whether the transferred funding was ring-fenced;***
- c. whether a notional Reflect allocation remained identifiable; and***
- d. what discretion local authorities had to cease funding Reflect.***

No formal guidance was provided at the time of the change given, when Welsh Government initially provided funding to support Reflect every local authority was informed that the

Reflect allocation provided had only been agreed for the 2017-18 financial year and that this funding would then be added to the Revenue Support Grant from April 2018.

The attached at **Doc 1** to Cardiff Council and **Doc 2** Vale of Glamorgan Council dated 29 June 2017 show this, stating that the Reflect funding would be added to the Revenue Support Grant from April 2018. Also attached for your information at **Doc 3** is the Award of Funding letter to Cardiff Council dated 20 July 2017 regarding the funding to establish a Reflect Project across the Cardiff & Vale region.

4. If a notional amount corresponding to the former Reflect funding remains identifiable within the local-government settlement, please provide the amount attributable to:

a. Cardiff Council; and

b. Vale of Glamorgan Council

for each financial year for which such information is held.

If no such notional allocation is identifiable, please confirm that this is the case.

Below is the notional Reflect funding provided by Welsh Government for Cardiff Council and Vale of Glamorgan Council for the 2018-19 financial year and the 2019-20 financial year.

Local authority	2018-19	2019-20
Cardiff Council	£105,185.00	£105,331.00
Vale of Glamorgan Council	£27,589.00	£27,525.00

(Important to note however that the Settlement is un-hypothecated and the formula used is simply a means of distributing the available funding.)

For 2020-21 onwards, the funding was no longer specifically earmarked in the overall Settlement formula. The funding remained in the baseline but was distributed via the routine Settlement formula calculation. This was because the relevant Local authority expenditure in this area would, by that time, have been recorded in the Revenue Outturn data (which is used to determine the Indicator Based Assessment totals). So, from 2020-21 onwards it would be impossible to determine how much of the original funding was allocated to each Local Authority.

5. Please provide any information held showing which Welsh local-authority or regional areas had an operational Reflect service in each of the financial years:

2022/23,

2023/24,

2024/25,

2025/26, and

2026/27.

The Welsh Government does not hold complete annual information on Reflect or equivalent provision for each of the financial years requested.

In the 2022/23 financial year the Welsh Government was informed that Barnados was no longer providing the Bridgend County Borough Council, Merthyr Tydfil County Borough Council and Rhondda, Cynon Taf County Borough Council Reflect service.

During 2024/25, Welsh Government sought information from local authorities about how the funding originally provided for Reflect was being used.

The table below provides a basic summary of the responses received, together with other information identified about provision. It reflects the geographical basis on which the information was provided. Some information was provided for individual local authority areas and some on a regional basis. As not all local authorities responded, the table represents a partial snapshot of the information available about provision during 2024/25.

Summary of information about Reflect or equivalent provision identified in 2024/25

Local authority or region	Reflect or equivalent provision reported in 2024/25
Bridgend County Borough Council	Equivalent provision reported (Baby in Mind).
Cardiff Council and Vale of Glamorgan Council	The Barnardo's regional Reflect contract expired; alternative local provision was being developed in Cardiff and the Vale of Glamorgan.
Carmarthenshire County Council, Powys County Council, Pembrokeshire County Council and Ceredigion County Council	Reflect provision delivered by Action for Children was identified. No direct local authority responses were received through the 2024/25 exercise.
Conwy County Borough Council	No response received.
Denbighshire County Council	No response received.
Flintshire County Council	Reflect provision reported.
Gwent region (Blaenau Gwent County Borough Council, Caerphilly County Borough Council, Monmouthshire County Council, Newport City Council	Reflect provision reported.

and Torfaen County Borough Council)	
Gwynedd Council	Reflect provision reported.
Isle of Anglesey County Council	Reflect provision reported.
Merthyr Tydfil County Borough Council	Equivalent provision reported (Camau Nesaf).
Neath Port Talbot County Borough Council	Reflect provision reported.
Rhondda Cynon Taf County Borough Council	Equivalent provision reported (Magu and Cefnogi Rhieni).
City and County of Swansea Council	Reflect provision reported.
Wrexham County Borough Council	No Reflect provision reported.

“No response received” means that Welsh Government did not receive information from the relevant local authority through the 2024/25 exercise. It should not be interpreted as confirmation that no Reflect or equivalent provision was available in that area.

The table reflects the information held by Welsh Government and does not provide a complete annual record of provision for each of the financial years requested.

6. Please provide the date on which Welsh Government first became aware that Reflect Cymru Cardiff and Vale of Glamorgan had ceased, or would cease, operating.

The Welsh Government was first notified through a joint letter from Cardiff Council and the Vale of Glamorgan Council, dated 19 December 2024, that the Reflect service delivered by Barnardo’s in those local authority areas had ended.

7. Please provide copies of substantive correspondence between Welsh Government and:

- a. Cardiff Council;***
- b. Vale of Glamorgan Council; and***
- c. Barnardo's***

from 1 January 2023 onwards which directly concerns funding, continuation, recommissioning, non-renewal or cessation of Reflect Cymru Cardiff and Vale of Glamorgan.

At **Doc 4** we have provided a joint letter dated 19 December 2024 from the Director of Children’s Services Cardiff and the Head of Children and Young People’s Services.

8. Please provide copies of any briefing, submission, ministerial advice, policy paper or assessment produced from 1 January 2023 onwards which discusses:

- a. the cessation of Reflect in Cardiff and/or the Vale of Glamorgan;***

- b. gaps in geographical availability of Reflect across Wales;***
- c. variation or inequality in access to Reflect according to local-authority area; or***
- d. the future funding or commissioning of Reflect Cymru nationally.***

At **Doc 5** we have provided Welsh Government official advice and a ministerial reply concerning the matters raised in a letter dated 18 February 2025 from Jane Hutt MS.

9. Current Welsh Government/Social Care Wales public information has described Welsh Government as having "rolled out the Reflect project across Wales". Please provide any recorded information from 1 January 2024 onwards which defines what Welsh Government currently means by Reflect being available or "rolled out" across Wales, particularly where one or more local-authority areas do not have an operational Reflect service.

The Welsh Government does not hold any recorded information produced from 1 January 2024 onwards that provides a further definition of what was meant by Reflect being available or "rolled out" across Wales.

10. Please provide any recorded assessment undertaken since 1 January 2023 of whether residents throughout all 22 Welsh local-authority areas currently have access to Reflect or an equivalent specialist service for parents following permanent removal of a child.

The Welsh Government has not undertaken a separate assessment of whether residents in all 22 local authority areas currently have access to Reflect or an equivalent specialist service. Please see the response to question 5 for the information gathered from local authorities during 2024/25. As not all local authorities responded, this does not provide a complete assessment of access across Wales.

11. Please provide any recorded information concerning whether Welsh Government has considered:

- a. restoring ring-fenced funding for Reflect;***
- b. establishing a national commissioning arrangement;***
- c. requiring or encouraging regional commissioning of Reflect;***
- d. funding replacement provision in areas where Reflect has ceased; or***
- e. otherwise ensuring consistent geographical access across Wales.***

The Welsh Government does not hold this information.

12. Please provide any recorded evaluation or monitoring data held centrally by Welsh Government from 2021/22 onwards concerning the outcomes or cost effectiveness of Reflect, including any data concerning recurrent care proceedings, subsequent pregnancies or children entering care.

The Welsh Government does not routinely collect monitoring or evaluation data covering the outcomes and cost-effectiveness of Reflect services, including the measures specified in

your request. The information identified as relevant to your request accompanies this response.

Doc 06 and 06a includes information provided to us by Barnardo's Cymru and **Doc 07 and 07a** by Swansea Council relating to covering the outcomes and cost-effectiveness of Reflect services.

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: 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,

Annex 1

Section 40(2) – Personal Information of the Freedom of Information Act

Section 40(2) together with the conditions in section 40(3)(a)(i) or 40(3)(b) provides an absolute exemption if disclosure of the personal data would breach any of the data protection principles.

‘Personal data’ is defined in sections 3(2) and (3) of the Data Protection Act 1998 (‘the DPA 2018’) and means any information relating to an identified or identifiable living individual. An identifiable living individual is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the individual.

We have concluded that, in this instance, the information requested contains third party personal data.

Under Section 40(2) of the FOIA, personal data is exempt from release if disclosure would breach one of the data protection principles set out in Article 5 of the GDPR. We consider the principle being most relevant in this instance as being the first. This states that personal data must be:

“Processed lawfully, fairly and in a transparent manner in relation to the data subject”

The lawful basis that is most relevant in relation to a request for information under the FOIA is Article 6(1)(f). This states:

“Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child”.

In considering the application of Article 6(1)(f) in the context of a request for information under FOIA it is necessary to consider the following three-part test: -

- **The Legitimate interest test:** Whether a legitimate interest is being pursued in the request for information.
- **The Necessity test:** Whether disclosure of the information/confirmation or denial that it is held is necessary to meet the legitimate interest in question.
- **The Balancing test:** Whether the above interests override the interests, fundamental rights and freedoms of the data subject.

Our consideration of these tests is set out below:

1. Legitimate interests

Your request relates to information about Reflect Cymru, which includes copies of emails, correspondence, briefings and advice.

We have concluded that, in this instance, there is little to be gained from releasing the names of individuals and other personal data which are included within the attached documentation. We believe we have provided sufficient information to satisfy the legitimate

interest, and we do not believe disclosure of the identities of those consultants would allow any greater understanding

2. Is disclosure necessary?

Following the above analysis, we do not believe that disclosure of the personal data is necessary.

3. The balance between legitimate interests and the data subject's interests or fundamental rights and freedoms

As we do not believe disclosure of this personal data is necessary, there is no requirement on us to undertake a test to balance the legitimate interests against the right of individuals, as the fundamental rights and freedoms provided by the DPA are not being challenged.