

Dear

## **ATISN 26216 – ADHD Medication**

Thank you for your request to the Welsh Government for information under the Freedom of Information Act (2000) received on 6 October 2025 regarding medication for Attention Deficit Hyperactivity Disorder (ADHD).

You requested the following:

1. Provide copies of any guidance, correspondence, meeting minutes, or advice issued by the All-Wales Medicines Strategy Group (AWMSG) or Welsh Government between 01 January 2022 and today which:
  - a. Refer to GP Shared Care prescribing of ADHD medication in Wales.
  - b. Discuss or advise against Shared Care arrangements where ADHD treatment was initiated in the private sector.
  - c. Were circulated to Health Boards, Medicines Management teams, or Local Medical Committees regarding Shared Care responsibilities for ADHD.
2. Provide any All Wales Shared Care Protocols currently approved for ADHD medications.

## **Our Response**

1a-c the information you requested is attached. Please note that some information that is personal and that may not already be in the public domain has been redacted under Section 40(2)– Personal Information of the Freedom of Information Act. An explanation of the use of these exemptions is provided at **Annex 1**.

AMWSG has relevant guidance on shared care available at:

[All Wales Shared Care Framework - All Wales Therapeutics and Toxicology Centre](#)

There is a section on private shared care arrangements (not specific to ADHD) in section 4.1.1 of [Prescribing Dilemmas: A Guide for Prescribers](#) from All Wales Medicines Strategy Group

The topic of shared care arrangements would have been discussed at AWMSG steering committee and the All Wales Prescribing Advisory Group (AWPAG). However, the minutes or papers of such meetings would be held by the All-Wales Therapeutics and Toxicology Centre (AWTTC) therefore we suggest that you contact them [here](#)

Shared care arrangements have been discussed in Senedd- These are available to search at [Search - Welsh Parliament](#)

Any specific shared care protocols would be held by health boards. Please see contact details here [NHS Wales health boards and trusts](#) | [GOV.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: [Freedom.ofinformation@gov.wales](mailto: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) 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 indicates you are interested in copies of any guidance, correspondence, meeting minutes, or advice issued by the All-Wales Medicines Strategy Group (AWMSG) or Welsh Government between 01 January 2022 and today which refer to GP Shared Care prescribing of ADHD medication in Wales and discuss or advise against Shared Care arrangements where ADHD treatment was initiated in the private sector and were circulated to Health Boards, Medicines Management teams, or Local Medical Committees regarding Shared Care responsibilities for ADHD.

We have concluded that, in this instance, there is little to be gained from releasing the names of individuals 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.