

23 October 2026

Dear

**ATISN 27577 – Adult ADHD Services**

Thank you for your request to Welsh Government for information under the Freedom of Information Act (2000) which was received on 26 September 2026, relating to adult ADHD services, Shared Care Agreements (SCAs), and the standardisation of ADHD pathways across Wales.

You have requested the following:

1. *Has the Welsh Government identified, assessed, reviewed, or discussed variation between Welsh Health Boards in relation to:*
  - a. *Adult ADHD pathways;*
  - b. *SCAs;*
  - c. *The acceptance of private ADHD diagnoses; or*
  - d. *Access to NHS prescribing following private assessment?*
2. *If so, please provide any recorded information held by the Welsh Government summarising:*
  - a. *The nature of those variations;*
  - b. *Any concerns raised regarding equitable access to ADHD assessment, treatment and prescribing across Wales; and*
  - c. *Any recommendations or proposed actions intended to address such variation.*
3. *Please provide details of any action taken, work undertaken, or initiatives implemented since 1 January 2023 by the Welsh Government to address such variation or to improve consistency and standardisation of adult ADHD pathways across Welsh Health Boards. Please also provide details of any current or planned work in this area.*
4. *Please provide copies of, or links to, any policy documents, guidance, frameworks, strategies, reports, briefing papers, presentations, business cases, consultation documents, or position statements held by the Welsh Government relating to the matters outlined in Questions 1–3.*

**Our Response**

**Question 1**

We can confirm that Welsh Government has discussed that there is a variation in adult ADHD services.

Welsh Government has also considered issues relating to shared care arrangements, prescribing responsibilities and the interface between NHS and privately obtained ADHD assessments.

**Question 2**

Information held by Welsh Government identifies the following themes:

### Concerns regarding equitable access

Issues raised through Welsh Government's engagement work include:

- Significant variation in access to adult ADHD assessment and support.
- Rising demand and pressure on service capacity.
- Concerns regarding long waiting times.
- Variability in prescribing arrangements and access to medication management.
- Challenges associated with private assessments and differing interpretations of requirements relating to specialist assessment and prescribing.

### Recommendations and proposed actions

Recommendations and actions identified through Welsh Government-supported work include:

- Adult ADHD roundtable report
- Draft ADHD Plan from NHS Wales Performance and Improvement Team
- Redesign of diagnostic pathways through a QB pilot test.
- Workforce development and training through the National Neurodivergence Team website.
- Digital innovation, including exploration of tools to support assessment processes.

### Question 3

Since 1 January 2023, Welsh Government has undertaken a range of activities intended to improve adult ADHD services and reduce variation.

These include:

- Development of a new all-age Neurodivergence Code of Practice intended to provide clearer expectations, improve accountability and promote more consistent approaches across Wales.
- The development of an Integrated Quality Statement, which will form part of the wider programme of work aimed at reducing variation and improving outcomes for neurodivergent people, including those with ADHD.

We can confirm that Welsh Government holds information relating to the above. however, we have concluded that this information is exempt from disclosure under Section 22 of the Freedom of Information Act 2000 - information intended for future publication. An explanation of our application of this exemption and the public interest tests is set out at **Annex A** of this letter.

- Convening an Adult ADHD Roundtable bringing together stakeholders to identify challenges and priorities for improvement.
- Establishment of an Adult ADHD Task and Finish Group to drive service improvement and develop a more consistent approach across Wales. The group's remit includes developing a national best-practice model, creating streamlined pathways and promoting consistency and equity.
- A draft ADHD Plan from NHS Wales Performance and Improvement Team, setting out actions for both WG and NHS P&I

- Consideration of digital solutions, including ADHD-specific assessment support tools and AI-enabled clinical documentation approaches. (QB test pilot)

#### **Question 4**

Welsh Government has identified a range of documents relevant to your request, including:

Neurodivergence Improvement Programme – Written Statements:

- [Written Statement: Neurodivergence Improvement Programme Priorities 2026-27 \(27 March 2026\) | GOV.WALES](#)
- [Written Statement: Transforming Neurodivergence Services \(27 June 2025\) | GOV.WALES](#)
- [Written Statement: Improving Neurodivergence Services \(3 February 2025\) | GOV.WALES](#)
- [Written Statement: Reducing Long Waiting Times \(17 November 2024\) | GOV.WALES](#)
- [Oral Statement: Evaluation of the Autism Code of Practice and Neurodivergence Update \(14 November 2023\) | GOV.WALES](#)
- [Oral Statement: Neurodivergence Improvement Programme \(2 May 2023\) | GOV.WALES](#)
- [Written Statement: Improvements in Neurodevelopmental Conditions Services \(6 July 2022\) | GOV.WALES](#)
- [Written Statement: Improvements in autism services \(23 September 2019\) | GOV.WALES](#)

Autism and Neurodivergence Policy and Background Resources:

- [GOV.WALES: Autism and Neurodivergence](#)

National Neurodivergence Team Resources:

- [Home - Niwrowahaniaeth Cymru | Neurodivergence Wales | National Neurodivergence Team](#)

Additional documents have also been provided as requested and attached separately. We have concluded that some of the information requested is exempt from disclosure under Section 40(2) – Personal Information of the Freedom of Information Act. An explanation of our application of this exemption is set out at **Annex B** of this letter.

#### **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 A

### Section 22 – Information Intended for Future Publication

Section 22 states that *Information is exempt information if –*

- a) The information is held by the public authority with a view to its publication, by the authority or any other person, at some future date (whether determined or not)*
- b) The information was already held with a view to such publication at the time the request for information was made, and*
- c) It is reasonable in all the circumstances that the information should be withheld from disclosure until the date referred to in paragraph a).*

I am of the opinion that subsections (a) and (b) above are met because the draft information is held with a view to its publication once finalised. The date for publication of this information has not yet been determined. The ND Code of Practice will be subject to a 12-week consultation period and will be published on the Welsh Government website in 2027. The Integrated Quality Statement, when completed, will also be published on the Welsh Government website.

With regards to part (c), I have given consideration as to whether it would be ‘reasonable in all the circumstances’ that the information should be withheld from disclosure until the proposed publication date. I am of the opinion that releasing the information at this time in its draft status, ahead of consultation would cause disruption to the Welsh Government’s intentions in relation to its publication arrangements. Thus I am content that the exemption is engaged.

Section 22 is a public interest exemption. This means that, in order to withhold information, I must show that the public interest in withholding is greater than the public interest in releasing it. In terms of the public interest, it is recognised that there is public interest in there being openness and transparency within Government.

The Welsh Government has committed to consulting on and publishing the All-Age Neurodivergence Code of Practice and Integrated Quality Statement. These documents will establish a coherent national framework for neurodivergence in Wales. The Code will clarify responsibilities, requirements and accountability across the system, while the Integrated Quality Statement will define the quality of support and outcomes that neurodivergent people should expect. Together, they will support greater consistency and equity, a whole-system and needs-led approach, and a shift towards earlier support that does not rely on diagnosis as the gateway to help.

To that end, I do not think it is reasonable in all the circumstances or in the public interest to release this information prematurely. Rather, I believe the public interest would be best served if the information were released as scheduled on the Welsh Government website. I am satisfied therefore that the balance of the public interest falls in favour of withholding the information.

## Annex B

### 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 adult ADHD Services across Wales, and a number of emails and documents have been caught by your request.

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.